



Finance Policy

This Policy should be read in conjunction with the Xavier Catholic Education Trust Finance Supplemental policies.

Policy 1	Reserves policy
Policy 2	Charging & Remissions policy
Policy 3	Lettings policy
Policy 4	Procurement & Tendering policy
Policy 5	Business Charge Card policy
Policy 6	Capitalisation & Depreciation of Assets policy
Policy 7	Acquisition and Disposal of Assets policy

This Finance Policy has been approved and adopted by the Xavier Catholic Education Trust in January 2026 and will be reviewed in January 2028

Committee Responsible: Finance Committee

Xavier Catholic Education Trust Mission Statement

Our mission is to provide an outstanding Catholic education for all the children in our schools. We will follow the example and teachings of Christ and everything we do will be inspired by gospel values. We will strive for excellence in all areas of our work and cherish every child in our care.

Glossary of Academy Terms

AAR	Academy Accounts Return - a financial return submitted to the DfE reflecting the Annual Financial Statements in a format appropriate for inclusion in the Whole Government Accounts
AO	Accounting Officer - the AO is responsible for compliance with the Academies Financial Handbook and Academies Accounts Direction. The individual must be a fit and suitable person for the role. In Trusts comprising a single academy this should be the principal. In multi-academy trusts it should be the chief executive or executive principal
AoA	Articles of Association – the AoA set out the internal management, decision making and running of the academy trust and its liability. It forms an annex to the FA for each academy
CFO	The Chief Financial Operating Officer – the CFOO is the person to whom the Trust’s detailed financial procedures are delegated
DfE	Department for Education - the DfE is the 'principal regulator' of academies. It is responsible for ensuring there is an adequate framework in place to provide assurance that all resources are managed in an effective and proper manner and that value for money is secured
FA	Funding Agreement - legally binding document between the Academy and the DfE
GAG	General Annual Grant - main funding grant received from the DfE
IS	Internal Scrutiny – this is a process for checking the Trust’s financial systems, controls, transactions and risks
MoA	Memorandum of Association - the MoA sets out the name of the academy trust. It provides details of the academy trust members under the Companies Act 2006. It forms an annex to the FA for each academy
RPT	Related Party Transactions - RPT are transactions related to the provision of goods or services by individuals or organisations connected to the academy trust
SORP	Statement of Recommended Practice - academies must comply with the Charity SORP
SoS	Secretary of State
DF	Delegated Funds – this is funding received from the DfE in accordance with the stated funding criteria (such as pupil numbers) for the core provision of education. It can take several forms, such as General Annual Grant (GAG), Universal Free School Meals, Pupil Premium, PE and Sports Premium etc. Delegated Funds are restricted for a specific purpose and can only be spent in accordance with those restrictions
SDF	School Development Fund (Governor’s Fund) – funds raised by Governors and parental donations direct to the school as opposed to PTA fundraising activity which is usually managed separately by the Parents Association in each school. The fund is independent of the main school budget

- SF School Fund – a vehicle for collecting monies passing through the school account for school trips, uniforms and school meals then disbursed to third party providers
- CF Capital Fund – Funding received from the Government and associated expenditure for assets and improvements from which a school can expect to benefit for more than one year e.g., land, buildings and vehicles. This can come directly to schools based on pupil population via Devolved Formula Capital (DFC) or at a Trust level via School Condition Allocation (SCA)

1. Introduction and statement of intent

The purpose of this finance policy is to support the Xavier Catholic Education Trust operating with accountability and transparency, meeting the requirements of the Funding Agreement, Academies Financial Handbook, Academies Accounts Direction, Companies Act 2006 and the appropriate Charities SORP.

2. Scope and applicability

- This policy applies to all members, Trustees, directors, governors and staff.
- Members of these groups involved with the financial management of the Xavier Catholic Education Trust should be familiar with the content of this policy, any related policies and procedures, The Academy Trust Handbook (Academies Financial Handbook) and The Academy Accounts Direction.
- The Xavier Catholic Education Trust accounting policies are fully aligned with The Academy Trust Handbook, Academies Accounts Direction, and the appropriate Charities SORP.
- All accounting transactions will be undertaken accordingly. Where there is scope/requirement for local decision making regarding any financial transactions this is indicated within the finance policy or associated policies and procedures.

3. Roles and responsibility

- All members, Trustees, directors, governors and staff must adhere to the 'seven principles of public life' (see Appendix A).
- The specific roles and responsibilities of all groups of people/ individuals who carry financial and assurance responsibilities within the Xavier Catholic Education Trust are set out below.
- The DfE will be notified of any alterations to governance via **Get information about schools** on the www.gov.uk website.

3.1 Members

The members of the Xavier Catholic Education Trust are the subscribers to our Memorandum of Association, and any other individuals permitted to become members under our Articles of Association. Their powers include the authority to appoint and remove Trustees. If the Trust ceases to exist, they have a limited financial liability defined in the Memorandum and Articles of Association.

There may be an overlap of people being both members and Trustees. This group will deal with both levels of responsibility, but a distinction between the two will be maintained to ensure that members provide oversight and challenge to the Trust.

3.2 Trustees/ Directors

For multi-academy trusts the terms Trustee and Director are interchangeable. For the purpose of this policy, the group is referred to as the *Trustees*.

3.2.1 Trustees – Multi Academy Trust

The Board of Trustees is responsible for the proper stewardship of funds received/donated, as compatible with the terms of the articles, funding agreement or the Academy Trust Handbook. This includes ensuring regularity, propriety, and economy, efficiency and effectiveness in their use: the three key elements of value for money.

Trustees must have the skills, knowledge and experience to run the academy trust. They are responsible for identifying and addressing any gaps in their skills through recruitment or training.

The Trustees are also responsible for the purchase of expertise where it is deemed necessary, and for the statutory appointment of an auditor to perform an External Audit in accordance with the Audit requirements detailed in the Academy Trust Handbook.

The Trustees evidence that their responsibilities are met through:

- Review of management accounts, in accordance with the Academies Financial Handbook, ensuring that variances between budget and actual income and expenditure are understood and addressed;
- Ensuring production of an Annual Report and Financial Statements in accordance with all finance policies, the Academies Financial Handbook, Academies Accounts Direction and the appropriate Charity SORP;
- Agreement of budget submission to DfE
- Benchmarking key performance indicators against similar schools;
- Governance Statement within the Annual Report and Financial Statements;
- Independent Reporting Accountant's Assurance Report on Regularity within the Annual Report and Financial Statements;
- Production and monitoring of a Risk Register;
- Internal Scrutiny reports and subsequent actions;
- Minutes of meetings; and
- Ensuring adequate insurance cover is in place and compliant with statutory obligations.

3.2.2 Governors – Multi Academy Trust

Each of the schools who are part of our Trust has a Local Governing Committee.

The Local Governing Committee is responsible for the local management of its school.

The Local Governing Committee evidence that its responsibilities are met through contribution to:

- Benchmarking key performance indicators against similar schools;
- Monitoring of a Risk Register; and
- Minutes of meetings.
- Ensure local decisions are supported by budget objectives

3.3 Risk & Audit Committee

The Xavier Catholic Education Trust Board of Trustees has appointed a dedicated Risk & Audit Committee to provide assurance over the suitability of, and compliance with, its financial systems and operational controls at all of its constituent academies. This will take into account the differing risks and complexity of its operations.

In accordance with the Academies Financial Handbook, The Audit & Risk Committee should meet at least three times a year and **must**:

- Direct the Trust's programme of internal scrutiny;
- Ensure that risks are being addressed appropriately through internal scrutiny;
- Report to the board on the adequacy of the Trust's internal control; and
- framework, including financial and non-financial controls and management of risks.

3.4 Accounting Officer

The AO of the Xavier Catholic Education Trust must have the skills, knowledge and experience to run the Trust. The AO serves as the Chief Executive Officer and is an ex-officio board member.

The AO has a personal responsibility to Parliament and to the Accounting Officer of the DfE for the resources under the Trust's control. The Accounting Officer is able to assure Parliament and the public of high standards of probity in the management of public funds, particularly:

- To ensure value for money to achieve the best possible educational outcomes through the economic, efficient and effective use of resources;
- To ensure regularity when dealing with all items of income and expenditure in accordance with legislation, the terms of the Trust's funding agreement and compliance with the Trust's internal procedures;
- To ensure propriety, the requirement that expenditure and receipts should be dealt with in accordance with Parliament's intentions and the principles of parliamentary control;
- To complete and sign a statement on regularity, propriety and compliance each year and submit this to DfE with the audited accounts;
- Demonstrating how the Trust has secured value for money via the governance statement in the audited accounts;
- To take personal responsibility for assuring the board that there is compliance with the Financial Academies Handbook and the funding agreement; and
- To advise the board in writing if the board appears to be failing to act where required to do so by the terms and conditions of the policy or funding agreement. If the accounting officer considers that the action proposed by the board is in breach of the articles, the funding agreement or this policy, the accounting officer will notify the DfE's accounting officer immediately, and in writing.

3.5 Chief Financial Operating Officer

The CFOO has both a technical and leadership role, including ensuring sound and appropriate financial governance and risk management arrangements are in place, preparing and monitoring of budgets, and ensuring the delivery of annual accounts. The CFOO must be appropriately qualified and/or experienced. Within the Xavier Catholic Education Trust, this role is fulfilled by the Finance Director.

3.6 Clerk to the board

The Trust must appoint a clerk to support the Board of Trustees who is someone other than a Trustee, principal or chief executive of the Trust.

3.7 All staff members

All staff members are:

3.7.1 appropriately qualified and/or experienced

3.7.2 responsible for:

- the security of academy property;
- avoiding loss or damage;
- ensuring economy and efficiency in the use of resources;
- conforming with the requirements of the academy's financial policies and procedures; and
- reporting any misuse of academy property or resources to their line manager.

4. Governance and financial oversight

The Board of Trustees has approved a written:

- scheme of delegation of financial powers that ensures appropriate separation of duties (see Appendices B, C); and
- internal control framework/financial procedures that support the maintenance of robust internal control arrangements and full and accurate accounting records.
- The Xavier Catholic Education Trust has appointed a Finance Committee to which the Board delegates financial scrutiny and oversight, and which can support the board in maintaining the Trust as a going concern.

4.1 Internal Control

The Xavier Catholic Education Trust has established a control framework that recognises public expectations about governance, standards and openness.

The internal control framework includes: (Annexes and associated policies indicated where they support the internal control framework/procedures):

- coordinating the planning and budgeting processes
- applying discipline in financial management, including managing banking, debt and cash flow, with appropriate segregation of duties - Appendices B, C
- preparation of monthly management accounts
- ensuring that delegated financial authorities are respected - Appendix C
- effective planning and oversight of any capital projects - Procurement and Tendering Policy/Internal Control Framework
- the management and oversight of assets – Acquisition and Disposal of Assets Policy
- the propriety and regularity of financial transactions
- compliance with Academies Handbook Managing Public Money principles / regularity requirements: Trust funds must be used appropriately and only for proper purposes, meaning expenditure such as alcohol is not permitted
- reducing the risk of fraud and theft – Whistleblowing Policy
- ensuring efficiency and value for money in the organisation's activities - Procurement and Tendering Policy

- a process for independent checking of financial controls, systems, transactions and risks - Programme of internal scrutiny works informed by the Risk Register

5. Financial Planning

The Xavier Catholic Education Trust has prepared financial plans to secure the short-term and long-term financial sustainability of the academy. A balanced budget for all funds, which can draw on unspent funds brought forward from previous years, will be submitted to the DfE annually in line with the DfE timeline and following their template.

The Board of Trustees will notify the DfE within 14 days if it is formally proposing to set a deficit revenue budget for the current financial year which it is unable to address, after unspent funds from previous years are taken into account.

Evidenced by:

- Minutes of meetings;
- The submission of the annual budget, informed by the School Development Plan and approved by the Board of Trustees to the DfE (Revenue & Capital);
- The submission of a three-year budget plan, informed by the School Development Plan, to the Board of Trustees (Revenue & Capital); and
- Cash flow and reserves review submitted to Trustees.

5.1 Managing Surplus General Annual Grant/Reserves

- The Xavier Catholic Education Trust funding is based on pupil census data.
- The Xavier Catholic Education Trust is committed to using its allocated GAG funding for the full benefit of current pupils.
- Any surplus balances, apart from any contingency of a maximum of 2% of GAG funding, will be supported by a clear plan for their use in the near future to the benefit of pupils.
- This plan is detailed in the Reserves Policy and is integrated with the budget plans to support the short-term and long-term financial sustainability of the academy.

5.2 Investments

- The Board of Trustees may invest funds to further the Trust's charitable aims and will do so in accordance with the powers set out in the Xavier Catholic Education Trust Articles of Association.
- Investment activity is managed centrally by the Trust on behalf of all schools to ensure a consistent, strategic, and well-governed approach to treasury management.
- The Trust will ensure that the security of funds and the accessibility (liquidity) of funds take precedence over the maximisation of returns.
- In line with the Academies Trust Handbook, the Trust adopts a prudent and proportionate approach to investment, ensuring public funds are safeguarded and risk is appropriately managed.
- The Trust maintains a balanced portfolio of short, medium, and long-term investments, selected to align with cash flow requirements while seeking to achieve appropriate returns without exposing funds to undue risk.
- All investments are subject to regular review to ensure they remain appropriate, compliant, and aligned to the Trust's financial strategy and risk appetite.
- The Trust will only place funds with reputable, regulated institutions and will ensure appropriate due diligence is undertaken before any investment decision is made.

6. Income Generation

- The Xavier Catholic Education Trust sets fees for its chargeable services at full cost and only applies an additional rate of return when in a commercial environment.
- Fees and charges for the cost of public services to other Government funded companies or bodies will be determined at full cost as per annex 6.1 of HM Treasury's Managing Public Money.
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6.1 Charging and Remissions

The Xavier Catholic Education Trust has a policy in place for Charging and Remissions to cover items such as classroom sales, trips and activities in line with the DfE guidance for maintained schools.

6.2 Lettings

The Xavier Catholic Education Trust has a policy in place to govern lettings. The policy is a statement of the aims, principles and strategy used for dealing with lettings at the Xavier Catholic Education Trust.

7. Procurement and Tendering

- The Xavier Catholic Education Trust has a policy in place for procurement and tendering that reflects the DfE, and EU Public Sector Procurement, low, medium and high level procurement procedures.
- The Procurement and Tendering policy include appropriate guidance and the details of any appropriate approvals required regarding any operating lease arrangements that may be considered during a procurement process.

7.1 Contract management

- All contracts are listed with the relevant expiry dates.
- The Xavier Catholic Education Trust review this annually when the budget is set to determine which contracts are due for renewal in the coming year.
- This supports a timely, appropriate procurement process that affirms the aims of economy, efficiency, and effectiveness.

7.2 Leases

- The Xavier Catholic Education Trust is aware that it may only enter into Operating Leases, e.g., rental agreements.
- The Xavier Catholic Education Trust will ask for the Secretary of State's consent if it wishes to:
 - take out a finance lease on any class of asset for any duration from another party, as this would represent borrowing;
 - take up a leasehold or tenancy agreement on land or buildings from another party for a lease term of more than seven years; or
 - grant a leasehold or tenancy agreement on land or buildings to another party for a lease term of any duration.

7.3 Borrowing

- The Xavier Catholic Education Trust is aware that it must seek the DfE's prior approval for borrowing (including finance leases and overdraft facilities) from any source where

such borrowing is to be repaid from grant monies or secured on assets funded by grant monies, and regardless of the interest rate chargeable.

- Corporate credit cards will only be used for business (not personal) expenditure, and balances cleared before interest accrues – Corporate Credit Card Policy.
- The Xavier Catholic Education Trust is aware that the Secretary of State’s general position is that academy trusts will only be granted permission for borrowing in exceptional circumstances. However, from time to time, the Secretary of State may introduce limited schemes in order to meet broader policy objectives, for example the Department’s Condition Improvement Fund for capital projects, and the Salix scheme designed to support energy saving which will be applied for as appropriate.

8. Related Party Transactions

Related Party Transactions are goods or services provided by individuals or organisations connected to the academy trust. In order to ensure that there can be no real or perceived conflicts of interest the Xavier Catholic Education Trust, in accordance with the Academy Trust Handbook, will pay no more than ‘cost’ for goods or services (‘services’ do not include services provided under a contract of employment) provided to it by a related party.

The DfE’s Academies Accounts Direction sets out that, for academy trusts, related parties include;

- Parties with control over, or controlled by, the entity (for example parent and subsidiary companies).
- Parties having significant influence over the entity.
- Key management personnel of the entity, including any director, whether executive or otherwise.
- Close family members (a definition of a close family member is included in the glossary FRS102).
- Others subject to control or significant influence by any individual referred to above.

Accounting standards require transactions between related parties to be disclosed in company financial statements as related party transactions. Such transactions are permitted under company law, charity law and under the Academy Trust Handbook provided that open and transparent procurement procedures have been followed and any potential conflicts of interest are adequately and appropriately managed.

The Trust will comply with the requirements of the Academy Trust Handbook which requires the reporting of contracts and agreements with related parties in advance of the contract or agreement taking place using the DfE’s online form for contracts and agreements made on or after 1 April 2023.

The Trust must obtain the DfE’s prior approval where an individual or cumulative contract or service exceeds £20,000. This does not include salaries and other payments made by the Trust to a person under a contract of employment through the Trusts’ payroll.

Whilst these provisions do not apply to contracts of employment, the same principles of securing value for money and using public money properly, including managing conflicts of interest, will still apply. Salaries paid should be appropriate to the individual’s skills and experience and the salary rates paid in the wider market.

Should any staff/personnel of an individual, or organisation connected to a member or

Trustee of the Trust be based in, or work from the premises of, the academy trust, that individual/ organisation and the Trust will agree an appropriate sum to be paid to the Trust for such use/occupation of the premises, save to the extent that they are carrying out work for the Xavier Catholic Education Trust. The Trust keeps a register of interest that captures relevant business and pecuniary interests of Members, Trustees, Local Governors of the schools within the Trust and senior employees. This will include the Accounting Officer if appropriate. This document is reviewed on a regular basis and published on the Trust's website. The Charity Commission's guidance *CC29 Conflicts of interest: a guide for charity Trustees* is utilised to ensure that this is completed appropriately.

8.1 At Cost/Full Cost – Definition for provision or receipt of goods and services

For these purposes, the cost will be the 'full cost' of all the resources used in supplying the goods or services. Full cost includes:

- all direct costs (the costs of any materials and labour used directly in producing the goods or services); and
- indirect costs (comprising a proportionate and reasonable share of fixed and variable overheads).

Full cost will not include an element of profit.

Full cost for the provision of public services to other Government funded institutions will be determined as per annex 6.1 of HM Treasury's Managing Public Money.

8.2 De Minimis for "At Cost/Full Cost" transactions

The 'at cost' requirement applies to contracts for goods and services from a connected party exceeding £2,500 cumulatively in any one financial year of the Trust. For these purposes, where a contract takes the Trust's cumulative annual total with the connected party beyond £2,500, the element above £2,500 must be at no more than cost.

8.3 Professional services

In relation to organisations supplying legal advice or audit services to the Xavier Catholic Education Trust, the 'at cost' requirement applies where the organisation's partner directly managing the service, is a member or Trustee of the Trust but not in other cases for those organisations. The published ethical standards for auditors also prevent partners or employees of the audit firm from acting as a Trustee of their client Trust, but not of other Trusts.

8.4 Documentation

The Xavier Catholic Education Trust will ensure that any agreement with an individual or organisation connected to a member or Trustee, as defined above, to supply goods or services to the Trust, is properly procured through an open and fair process and is:

- supported by a statement of assurance from that individual or organisation to the Trust confirming that their charges do not exceed the cost of the goods or services; and
- on the basis of an open book agreement including a requirement for the supplier to demonstrate clearly, if requested, that their charges do not exceed the cost of supply.

8.5 Governor Allowances

The Xavier Catholic Education Trust will reimburse Trustees/Governors for actual costs incurred in carrying out their duties.

9. Novel and/or contentious transactions

Novel payments or other transactions are those of which the Xavier Catholic Education Trust has no experience or are outside the range of normal business activity for the Trust. Contentious transactions are those that might give rise to criticism of the Trust by Parliament and/or the public and/or the media. The Board of Trustees for explicit prior authorisation will always refer to novel and/or contentious transactions to the DfE.

10. Delegated Authority – Special payments to staff

10.1 Staff severance payments

If the Xavier Catholic Education Trust is considering making a staff severance payment above the statutory or contractual entitlements, the Board of Trustees will consider the following issues:

- Whether the proposed payment is in the interests of the Trust.
- Whether the payment is justified, based on a legal assessment of the chances of the Xavier Catholic Education Trust successfully defending the case at employment tribunal. This is relevant because if there is a significant prospect of losing the case then a settlement may be justified, especially if the costs incurred in maintaining a defense are likely to be high. Where a legal assessment suggests that the Trust is likely to be successful, a settlement will not be offered.
- If the settlement were considered to be justified, then the Board of Trustees would need to consider the level of settlement. This must be less than the legal assessment of what the relevant body (e.g., an employment tribunal) is likely to award in the circumstances.

Staff severance payments will not be made where they could be seen as a reward for failure, such as gross misconduct or poor performance. The only acceptable rationale in the case of gross misconduct would be where legal advice is that the claimant is likely to be successful in an employment tribunal claim because of employment law procedural errors. In the case of poor performance, an acceptable comparison would be the time and cost of taking someone through performance management and capability procedures.

The academy trust has delegated authority to approve individual staff severance payments provided any non-statutory/non-contractual element is under £50,000 gross (i.e., before income tax or other deductions). Where the Trust is considering a non-statutory/non-contractual payment of £50,000 or more (gross, before deductions), DfE's prior approval **must** be obtained before making any binding offer to staff. DfE will refer such transactions to HM Treasury.

The Xavier Catholic Education Trust Trustees are aware that the following schedule of delegation applies to severance payments and will not operate outside this guidance:

Statutory/contractual payment	Non-statutory/non-contractual payment	DfE prior approval required.
£30,000 +	£30,000 +	No
£60,000 +	£30,000 +	No
£30,000 +	£50,000 +	Yes (for £50,000)

10.2 Compensation payments

The Xavier Catholic Education Trust will make appropriate compensation payments to provide redress for loss or injury, for example: personal injuries; traffic accidents; or damage to property. If the Board of Trustees is considering making a compensation payment, it will base its decision on a careful appraisal of the facts, including legal advice where relevant, and ensure that value for money will be achieved.

The Xavier Catholic Education Trust is aware that, as for severance payments, it has delegated authority to approve individual compensation payments provided any non-statutory/non-contractual element is under £50,000. Where the Trust is considering a non-statutory/non-contractual payment of £50,000 or more, DfE's prior approval **must** be obtained.

Where a compensation payment has been necessitated by an event that reveals concerns about the effectiveness of internal control systems, the Board of Trustees will take any necessary steps to put failings right.

10.3 Ex gratia payments

10.4

Ex gratia payments are a type of transaction that goes beyond statutory or contractual cover or administrative rules, e.g., payments to meet hardship caused by official failure or delay, and payments to avoid legal action on the grounds of official inadequacy.

Ex gratia transactions will always be referred to the DfE by the Board of Trustees for prior authorisation.

10.5 Gifts and Hospitality

The Xavier Catholic Education Trust has a policy in place for the acceptance of Gifts and Hospitality. This includes a register on the acceptance of gifts, hospitality, awards, prizes or any other benefit that might be seen to compromise the staff's personal judgement or integrity; and ensures that all members of staff are made aware of this.

When giving gifts, the Trust ensures that the value of the gift is reasonable, is within the limits stated in the Gifts and Hospitality policy, the decision is fully documented and has due regard to propriety and regularity in the use of public funds.

11. Fixed Assets Accounting

Further detail on asset classification, capitalisation thresholds and depreciation rates is set out in the supplementary Fixed Assets Policy.

Items of an attractive or portable nature with a value below the £5,000 capitalisation threshold are recorded in the Fixed Asset Inventory and are subject to the same control procedures as assets held on the Fixed Asset Register.

The disposal of assets is governed by the Acquisition and Disposals of Assets Policy.

12. Accounting Adjustments

The Xavier Catholic Education Trust prepares accruals accounts, giving a true and fair view of the Trust's use of resources, in accordance with existing accounting standards and the Charities SORP2015.

Prepayments and accruals are recorded where the effect of not doing so would distort the management accounts in a material manner. All other accounting adjustments are reflected at year end.

The Trust applies an internal guideline of £500 when considering accruals and prepayments that cross financial reporting periods. Any income or expenses below this amount are considered immaterial and are recognised in the month paid.

13. Retention of Finance and Payroll Records

All records relating to the Financial Management of the Xavier Catholic Education Trust are retained in line with the Information and Records Management Society "Records Management Toolkit for Schools" and the Records Management Policy contained within this.

14. Whistleblowing

The Xavier Catholic Education Trust has a policy in place for whistleblowing and ensures that all staff are aware to whom they can report their concerns, and the way in which such concerns will be managed.

15. Risk Management

The Xavier Catholic Education Trust has made a considered choice about its desired risk profile, taking account of its legal obligations, business objectives and public expectations. It has recognised and is managing present and future risks to ensure continued and effective operation. Where reasonable recommendations are made by risk auditors these will be addressed by the Trust.

Appendix A

Committee on Standards in Public Life

The 7 principles of public life

1. Selflessness

Holders of public office should act solely in terms of the public interest.

2. Integrity

Holders of public office must avoid placing themselves under any obligation to people or organizations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.

3. Objectivity

Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

4. Accountability

Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

5. Openness

Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

6. Honesty

Holders of public office should be truthful.

7. Leadership

Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

<https://www.gov.uk/government/publications/the-7-principles-of-public-life/the-7-principles-ofpublic-life--2>

Appendix B - Scheme of Delegation Payments

Xavier operates a system of financial controls designed to ensure that expenditure is properly authorized, represents value for money and is appropriately recorded and paid.

Pre-approval of expenditure

All expenditure must be pre-approved through the Trust's purchase order system, in line with delegated approval limits. Limited exceptions apply, such as emergency expenditure and routine contractual payments made by direct debit (e.g. rates, energy, utilities).

Purchase Orders are approved by the schools' Senior Leadership Team to confirm that the planned spend is necessary, appropriate and within budget.

Invoice approval and payment preparation

All supplier invoices must be reviewed and approved at school level prior to payment.

Invoices are matched to approved purchase orders.

The finance team prepare payments, checking supplier details and anti-fraud checks.

A pre-payment report is approved by a member of the Senior Leadership Team at the school, confirming that the expenditure is valid, budgeted, and properly incurred

Payment authorisation

Payments are made electronically via BACS or Faster Payments using the Trust's online banking platform.

Limited exceptions apply for expenditure settled via approved corporate cards or reimbursed through staff expense claims, which are subject to separate approval and review controls.

All electronic payments require dual authorisation by approved bank signatories within the banking platform.

Signatories authorising payments must not have been involved in the creation or approval of the payments.

All payment authorisations are completed electronically; no duplicate paper approval is required.

The use of cheques is limited and only permitted where electronic payment is not possible. Where cheques are used, the following authorisation requirements apply:

Primary Schools: Cheques up to £250 require one authorised signature, over £250 require two.

Secondary Schools: Cheques up to £500 require one authorised signature, over £500 require two.

Appendix C – Scheme of Delegation Procurement of resources

Secondary Schools	Approval Level 1	Approval Level 2	Approval Level 3
Supplies & services Educational	Head of Department £5,000	Business Manager £10,000	Finance Committee £100,000
Premises	Facilities Manager £5,000	Business Manager £10,000	Finance Committee £100,000
Supplies & Services non-Educational	Budget Holder £5,000	Business Manager £10,000	Finance Committee £100,000
IT	IT Manager £10,000	Business Manager £10,000	Finance Committee £100,000
Capital Items (Fixed Assets)	Business Manager £15,000	Head Teacher £25,000	Finance Committee £100,000
Primary Schools	Approval Level 1	Approval Level 2	Approval Level 3
Supplies & services Educational	Business Manager £5,000	Head Teacher £10,000	Finance Committee £100,000
Premises	Business Manager £5,000	Head Teacher £10,000	Finance Committee £100,000
Supplies & Services non-Educational	Business Manager £5,000	Head Teacher £10,000	Finance Committee £100,000
IT	Business Manager £5,000	Head Teacher £10,000	Finance Committee £100,000
Capital Items (Fixed Assets)	Business Manager £5,000	Head Teacher £10,000	Finance Committee £100,000

Note:

Individual Schools may have lower authorities, but these are the maximum.

The Local Governing Body must agree to any expenditure for which there is no approved budget.

Any purchases over £100,000, for which there is no approved budget, must be approved by the Trust Board Finance Committee refers to the Xavier CET Finance Committee.