

# Green Templeton College

## Financial Regulations

### Index

1. Status and scope of the financial regulations
2. Amendment of the financial regulations
3. Regulatory framework of the College for financial matters
4. Audit
5. Fraud
6. Whistle blowing
7. Ethical policy
8. Disclosure of interests
9. Risk management
10. Dissemination of information regarding the College to external organizations
11. Financial development plan, budget and budgetary control
12. Accounting records
13. Retention of financial documents
14. Accounting systems
15. Annual financial statements
16. Banking arrangements
17. Receipts
18. Student fees
19. Acceptance of gifts to the College
20. Borrowing
21. Investment
22. Petty cash
23. Authority to enter into contracts
24. Authority on staff matters
25. Sales
26. Purchases
27. Stocks
28. Equipment and furniture
29. Buildings
30. College vehicles
31. Insurance
32. Legal advice
33. VAT
34. Staff
35. Travel and subsistence
  - 35.1 Employees and officers: claims for reimbursement
  - 35.2 Employees and officers: Travel advances
  - 35.3 Students: Travel awards

36. Payments for entertaining
37. Commercial activities
38. Gifts and hospitality

Appendices :

- A Retention of financial documents

## **1. Status and scope of the financial regulations**

The financial regulations apply to all funds, irrespective of their source, passing through the College's accounts and the conduct of all the financial affairs of the College.

The financial regulations are in addition to the Statutes of the College which set out how the business of the Governing Body and sub-committees is to be conducted.

The primary objective of the financial regulations is to ensure the proper use of finances and resources in a manner which satisfies the College's requirements for accountability, internal control, and the management of financial risk. The regulations translate into practical guidance the College's broad policies relating to financial control.

Compliance with these regulations is mandatory for all members of the College which includes staff, students, fellows and other associated individuals. Members of the College who fail to comply with the financial regulations may be subject to appropriate action under the College's disciplinary procedures. Breaches of the financial regulations will be notified to the Principal.

It is the responsibility of the Principal and Treasurer to ensure that all fellows, officers, employees and student office holders are alerted to the existence and content of the College's financial regulations. Copies are available from the Treasurer or on the college web site.

Any queries regarding the interpretation of the financial regulations shall be referred to the Treasurer.

## **2. Amendment of the financial regulations**

The College financial regulations are subject to an annual review by the Treasurer but may only be amended following approval by the Governing Body upon the recommendation of Finance & GP Committee.

In the case of urgent need, the Principal may agree to the amendment of financial regulations for a particular case. Such amendment shall relate only to the case in respect of which it is made and shall lapse if not confirmed by the next meeting of the Governing Body.

## **3. Regulatory framework of the College for financial matters**

The Governing Body is responsible for the management and administration of the College and for ensuring the proper use of all funds received by the College but for all every day operations of the College and for all actions within the annual budget, as approved by the Governing body, this authority is delegated to the Principal.

The Principal is responsible to the Governing Body for ensuring that sound systems of internal control are in place to enable the proper processing of the College's transactions and to ensure that records are maintained in as complete and accurate a form as possible.

The Vice Principal will assume the responsibilities assigned to the Principal in the case of the sustained absence of the Principal e.g. through end of term of office or incapacity.

Access to accounting systems should be restricted to that appropriate to each user's role and responsibilities.

#### **4. Audit**

The external auditors of the College and any other authorized auditors (eg, HMRC), have the right to unrestricted access to all vouchers, documents, books of account, and computer data and to any other information which they consider relevant to their enquiries and which is necessary to fulfil their responsibilities. External auditors also have the right to verify assets and the right of direct access to any employee or person responsible for the administration or management of College funds with whom it is felt necessary to raise and discuss such matters.

#### **5. Fraud**

The College is responsible for ensuring the establishment and maintenance of adequate systems of internal control for the prevention and detection of fraud and irregularities.

The Principal or person(s) nominated by the Principal are responsible for investigating any matters involving irregularities or suspected irregularities in the exercise of activities of the College including financial matters such as fraud concerning cash, stores or other property.

The Principal shall be immediately informed by any fellow of the College or by any member of staff of any matter arising which involves or is thought to involve financial or accounting irregularities concerning the assets of the College.

The Principal shall take such steps as considered necessary to investigate and report on any such matter.

Where any investigations produce prima facie evidence that a criminal offence has taken place then the Principal shall have discretion, taking into account the circumstances and seriousness of the case, to determine whether the Police shall be informed.

## **6. Whistle blowing**

The Public Interest Disclosure Act provides employees with legal protection against being dismissed or penalized by their employers as a result of disclosing certain serious concerns.

## **7. Ethical policy**

Employees and others with responsibility for the administration or management of College funds should not use their authority or office for personal gain and should always seek to uphold and enhance the standing of the College.

## **8. Disclosure of Interests**

A member or employee of College having a personal, financial, or other beneficial interest in any transaction between the College and third parties shall disclose that interest to the Principal.

Where the matter in which the individual has a personal interest is to be discussed at a committee meeting the individual must :

- Declare an interest before the meeting or at the meeting before discussions begin on the matter.
- Be absent from the meeting for that item unless expressly invited to remain in order to provide information.
- Not be counted in the quorum for that part of the meeting.
- Be absent during the vote and have no vote on the matter.

## **9. Risk management**

The College acknowledges the risks inherent in its activities and is committed to managing those risks, through its Risk and Audit Committee, which pose a significant threat to the achievement of its business objectives and stability.

## **10. Dissemination of information regarding the college to external organizations**

No information regarding the future development or strategy of the College shall be issued formally to external organizations without the knowledge and approval of the Principal. No financial data shall be submitted formally to external organizations without first being reviewed and approved by the Treasurer.

## **11. Financial development plan, budgets and budgetary control**

The Treasurer will prepare annually a medium term finance development plan in line with the strategic direction of the College and present it to the Principal for review. The budget for the following year will form the first year of the plan. The plan will then be presented to the Finance & General Purposes Committee and following its approval to the next meeting of the Governing Body.

Control of spend against the agreed budget is a continuous process throughout the year and a quarterly review of the College's performance against budget is to be submitted each term to the Finance & General Purposes committee.

Individuals are not authorised to commit the College to expenditure without first ensuring that there are sufficient funds to meet the purchase cost within budget. If any departure from budget is foreseen it must be reported immediately to the Treasurer and before any further commitment of funds is undertaken.

Only authorised staff have access to the financial records.

## **12. Accounting records**

The Principal shall ensure that all monies under the College's control are kept safely, and are used only for the purposes for which they are approved; and that all transactions are properly recorded in the accounting system.

## **13. Retention of financial documents**

Guidelines for the retention of documents are in Appendix A.

## **14. Accounting systems**

All employees with access to any of the College's accounting systems must comply with the relevant password and security controls. Further information is available on the College web site regarding password security and regulations relating to the use of Information Technology facilities.

The College will operate such accounting systems as are appropriate to the financial activities of the College.

## **15. Annual financial statements**

The Governing Body will approve the annual financial statements of the College for each year to 31 July following recommendation from the Risk and Audit Committee.

## **16. Banking arrangements**

All monies receivable by the College are to be regarded as income of the College. College income includes all monies made available to individuals on the basis of their association with the College.

No private bank accounts may be used to divert any moneys receivable by the College.

Transactions through the College bank account will be promptly and properly accounted for. Bank statements are to be reconciled monthly and reviewed by the Treasurer. Any discrepancies must be investigated immediately and rectified as appropriate. Payments may only be made from the account under exceptional circumstances.

Any proposed changes to the mandate for the College bank mandate must be approved by the Principal.

All cheques drawn on the College bank account require two signatories. When not in use the cheque book for the College bank account must be kept in a locked cabinet.

## **17. Receipts**

All income received by the College should be identified, receipted and recorded on the day of receipt and banked in the next collection.

Staff responsible for the handling and custody of cash must adhere to the following:

- all monies and any other valuable items must be held in cash drawers, where available, and shall be locked, when not in use, in a fire proof safe
- cash income must not be counted in public view or left unattended, even temporarily
- monies received should, wherever possible, be balanced daily and paid over to the Finance Officer on the day of receipt
- safes must be kept locked at all times except when in use to deposit or receive monies or other items
- post dated cheques must not be accepted for payment except by prior arrangement with the Finance Officer and Financial Co-ordinator
- an official College receipt must be given for all cash received
- all receipt books when not in use must be kept in a locked cash drawer or safe.
- no deductions may be made from any cash collected on behalf of the College prior to paying the funds over to the Finance Officer.

Those making payment to the College should be advised that cheques are to be made payable to 'Green Templeton College' and send payment to Green Templeton College, Woodstock Road, Oxford OX2 6HG.

The postal service and University Messenger Service must not be used to send cash.

## **18. Student fees**

In accordance with the regulations of the University no person shall be presented for a degree unless he or she has paid all the sums due from him or her to the University.

Furthermore no student shall be presented for a degree unless he or she has paid all sums due from him or her to the College. Variation in the College fee and fee waiver may only be granted by the Principal.

## **19. Acceptance of gifts to the College**

The following persons are authorised to give a valid receipt on behalf of the College :

- (a) the Principal
- (b) the Development Director for amounts up to £10,000

Any gifts which bear restrictive conditions should be notified to the Principal. The Development Director will maintain a record of gifts received and initiate claims for the recovery of tax where appropriate.

All members or employees of the College who are offered donations or endowments for the College must have regard to the possibility that the funds may emanate from illegal sources. They should exercise particular caution:-

- (1) where, having been offered large donations from persons whose identity is not known to the College, they do not receive satisfactory replies to the further enquiries they make;
- (2) where donations are conditional on particular individuals or organisations being used to do work for the College;
- (3) where offers of donations in cash or foreign currencies are made for a certain period of time, during which the College is to receive the interest, before the capital sum is returned to the donor at the end of the specified period in sterling.

Any such cases must be referred promptly to the Principal.

## **20. Borrowing**

No borrowing may take place and College assets may not be offered as security for any borrowing, without the approval of the Governing Body.



## **21. Investment**

The Investment Committee is responsible for the investment of funds and endowments of the College.

In the exercise of its responsibilities, the Investment Committee shall have regard at all times to :-

- the suitability (both generically and specifically) of particular investments to the College
- the need for diversification of investments ; and
- the need to obtain and consider proper advice

All investments shall be made in the name of Green Templeton College.

## **22. Petty cash**

Where a petty cash float is provided to pay minor expenses, it may not be used for ;

- cashing of personal cheques
- payment to regular suppliers
- gifts to members or former members of staff
- payment for non-business use of goods or services
- personal expenditure
- loans or advances to employees or students
- wages or salaries
- payments for items in excess of £50
- payment for staff parties/entertainment

No payment is to be made from petty cash unless supported by invoices/vouchers authorized by the appropriate budget holder. Cash receipts should not be added to petty cash balances but must be banked.

Regular claims for reimbursement of the float, supported by the receipts or vouchers, should be submitted on the standard form.

Only staff authorized to operate a petty cash float are permitted access to the float. The holder of the float is responsible for its security and must inform the Finance Officer as soon as practical of any loss.

Float holders must regularly reconcile their float by ensuring that the total of cash in hand and vouchers/invoices for amounts paid out equals the value of the float.

Periodically, with a minimum of once a year, the Finance Officer will confirm all petty cash balances except the College petty cash float which will be checked by the Treasurer. Requests for any new floats or changes in the float must be approved by the Treasurer and / or the appropriate college committee.

### **23. Authority to enter into contracts**

The Principal has the authority to enter into contracts and to provide all necessary authorisations for all operations concerning the every day operation of the college.

The Principal may delegate this authority to budget holders and those given delegated authority may delegate further on an ad hoc basis.

No discussions with third parties which might lead to a contractual situation where the amount exceeds an individual's authority level can be conducted without the knowledge and agreement of the Principal. This applies equally to the receipt and expenditure of funds.

Any activity outside the daily operation of the College requires authorisation by the Governing Body. The Principal will act on behalf of the Governing Body in effecting the transaction. This would include the purchase, sale, leasing and charging of real property.

No contract may be entered into which is illegal and / or does not comply with the obligations laid down by HEFCE, HM Revenue & Customs or other government authorities.

Authority from the Finance and General Purposes Committee is required for the set up or removal of any subsidiary or associated company.

### **24. Authority on staff matters**

Regulations and policies regarding personnel appropriate to the situation of the College will be authorised by the Governing Body after review by the HR Committee.

### **25. Sales**

The Principal is responsible for establishing procedures to ensure that all sales are authorised and are subject only to acceptable risks.

The liability to VAT of all goods and services supplied must be established, and VAT charged and accounted for as appropriate. The College's internal authority on VAT questions is the Treasurer.

When determining the prices to be charged for research contracts, residences, conferences, catering and services to external customers the College the full cost to the College should be assessed. Sales invoices are to be raised promptly.

The full cost should be recovered unless it is appropriate to do otherwise having regard to the particular circumstances.

The Principal must approve sales to employees, members of the College, and other customers which are made without charge, or at a charge below that normally made to external customers.

The Treasurer and Bursar must ensure that appropriate charges are made for the use of College premises and facilities for non-College purposes.

The Treasurer will ensure that arrangements are in place for credit control, proper monitoring of all debts, and the follow up on overdue accounts. Payment arrangements in respect of any amounts overdue can only be made with the agreement of the Treasurer, Financial Co-ordinator or Finance Officer.

All members of College have a duty to inform the Treasurer of any potential new sources of income which may arise as a result of College activities.

Requests to write-off any other category of debt must be referred in the first instance to the Treasurer.

## **26. Purchases**

The Principal is responsible for establishing procedures to ensure that goods and services are ordered in required quantities of suitable quality at the best terms available, after appropriate requisition and approval.

The person placing the order must ensure that the expenditure is a valid charge to the College and that adequate budgetary provision is available to meet the expenditure.

To ensure invoices are paid when due invoices must be passed to the College Office as soon as they have been certified for payment by the person who placed the order. In carrying out this check it must be ensured that:

- the invoice agrees to the order
- the prices, calculations, trade discounts, credits and the VAT amount are correct
- the goods have been received or services rendered are satisfactory
- the expenditure is a proper liability of the College
- the invoice has not been previously passed for payment

Suppliers should be instructed that all invoices must be addressed to Green Templeton College Woodstock Road Oxford OX2 6HG.

Use of copy invoices for payment should be avoided wherever possible. Where this is not possible copy invoices should be boldly marked 'COPY'.

Duties of staff should be segregated wherever possible, so that more than one person records and processes each transaction.

Payments to suppliers will normally be by way of BACs transfer or computer generated cheque.

Payments under employment contracts must be made through the payroll and not by any other means.

## **27. Stocks**

The Treasurer is responsible for ensuring that stocks are adequately protected against loss or misuse.

Stocks should be maintained at the minimum level required to support operations.

A physical stock count must be conducted at least once a year, preferably 31 July and any significant discrepancies investigated.

## **28. Equipment and furniture**

The Principal is responsible for establishing procedures to ensure that all items of equipment and furniture are adequately protected against loss, damage and misuse, and that all purchases and disposals of equipment are properly authorized, accounted for and recorded.

Any proceeds from the sale of equipment will normally be credited to the account of the College.

Inventories must be maintained and updated at least once a year for each of:

- Furniture and equipment in rented accommodation, and
- Computer equipment.

Insurance will be arranged through appropriate insurers and the Treasurer will provide annually a list of all College property, equipment and items on loan for which all-risks insurance is required.

Items purchased or borrowed will also be notified at the time of acquisition where the individual value exceeds £50,000.

No asset belonging to the College may be removed for personal use without approval in writing from the Bursar.

## **29. Buildings**

The Principal is responsible to the Governing Body establishing procedures for the management and maintenance of the College's property.

The Principal can authorize any building works on College properties associated with the ongoing operation of the college for example repairs and maintenance and minor works. Any other building works, however funded, would require the prior permission of the Governing Body.

The authority of the Governing Body is required for the purchase, lease or sale of property. In urgent cases that authority may be exercised by the Principal on the Governing Body's behalf and reported subsequently to the Governing Body.

### **30. College vehicles**

No College owned vehicle may be used unless it is insured for the purpose for which it is being used, carries a valid vehicle excise disc, and has a valid MOT test Certificate where required; and unless the driver is qualified to drive the vehicle.

College vehicles may be used only by persons and for purposes authorized in writing by the Principal and a record of authorized drivers should be maintained.

Where the use of College vehicles is authorized for travel to and from work and they are not left on College premises at night, any employee of the College is likely to be taxed on the benefit enjoyed.

Where private use is allowed, the terms and conditions of use and reimbursement of costs must be authorized in writing by the Domestic Bursar; the motor insurance cover provided through the University will operate in respect of private use of vehicles where this authorization has been obtained: it is possible that the cover will not operate in the event of an incident arising during a period of private use where the appropriate permission has not been sought and obtained.

The College vehicles must be included in the College's asset register: any acquisition must be notified immediately to the College insurers.

### **31. Insurance**

Sporting activities undertaken by the students through Osler House Club will be insured in accordance with the regulations and procedures of the Osler House Club.

### **32. Legal Advice**

Legal advice on staff matters will be obtained as part of the College's agreement with its retained consultant on employment matters. All other legal advice will be obtained as directed by the Principal.

The taking or defending of any court, tribunal, arbitration, adjudication or (formal) mediation proceedings will be initiated and managed :

- in the case of staff matters by the College's retained consultant as part of the College's agreement with them, and
- in all other cases as directed by the Principal.

### **33. VAT**

The College is a partially exempt, registered, taxable body, and has a legal obligation to account properly for VAT.

The College is responsible for its own VAT affairs, including ensuring that it is adequately informed about the VAT and related aspects of matters in which it deals. The Treasurer is the College's internal authority on VAT questions.

The Treasurer must submit correct and timely returns of VAT.

### **34. Staff**

All College employees shall be paid through the payroll.

All documents sent to the Payroll Office authorizing the payment of new employees or subsequent changes to their salary or other details must be authorized in accordance with the relevant register of authorized signatures.

It is the responsibility of the Principal or HR Manager:

- To ensure, by inspection of documentation specified by the Immigration and Nationality Directorate for this purpose, that every prospective employee has the right to work in the UK; or
- If the person does not have this right, to obtain a work permit from the Home Office for the specific employment proposed.

### **35. Travel and subsistence**

#### *35.1 Employees and officers: Claims for reimbursement*

The claims must be for the reimbursement of actual expenditure incurred wholly and necessarily on the business of the College.

Supporting vouchers must be provided for the cost of accommodation, fares, and other items of expenditure.

No round sum allowances may be paid.

An owner whose vehicle is being used for travel on College business must ensure that it is adequately insured for that purpose.

Employees cannot be reimbursed for the cost of travel to and from their normal place of work otherwise than in exceptional circumstances, when the permission of the Principal must be sought.

No one may authorize reimbursement of his or her own expenses.

Claims should be approved by an employee senior to the claimant: except for any claim by the Principal whose claims shall be authorized by the Treasurer.

Those traveling abroad on College business should take out appropriate insurance cover.

### *35.2 Employees and officers: Travel advances*

Advances will normally be made only to employees and officers of the College for up to two weeks costs.

Advances will be limited to:

- 75% of the estimated cost of up to two weeks subsistence; and
- the full cost of fares (unless the fare is paid direct by the College)

Requests for advances should be made on the College expense claim forms giving details of dates and countries to be visited, and a breakdown of the advance required.

Claimants must submit full documentation within seven days of return, and the process of accounting for the claims against advances must be completed within one month of the return date.

Advances should not be outstanding for more than two months.

### *35.3 Students: Travel awards*

Payments will be made to the student following the receipt of invoices / vouchers to the value of the grant awarded as notified to the student in a letter from the Senior Tutor.

## **36. Payments for entertaining**

Entertaining in the form of meals and hospitality should, wherever possible and appropriate, be carried out in College.

Expenditure on entertainment or courtesy gifts may be an appropriate use of College funds: it will avoid tax liability only if it is incurred wholly, necessarily and exclusively for College purposes.

Details must be included with the claim which specify those entertained or honoured, their companies or institutions, and the purpose of the entertainment or gift.

Prior authorisation must be obtained from the Principal for any expenditure to be incurred on entertaining and gifts. The subsequent expense claim, which must be supported by vouchers, must be submitted to the Treasurer for authorisation.

### **37. Commercial activities**

No non-College commercial activities may be carried out on College premises, and no College facilities may be used for such activities, unless approved by the Principal.

In no circumstances may the College address (whether postal or email) be used for non-College commercial activities.

### **38. Gifts and hospitality**

No employee may accept corruptly any gift or consideration as an inducement or reward for doing, or refraining from doing, anything in an official capacity or showing favour or disfavour to any person in an official capacity. The guiding principles to be followed by all members of staff must be:

- The conduct of individuals should not create suspicion of any conflict between their official duty and their private interest;
- The action of individuals acting in an official capacity should not give the impression (to any member of the public, to any organization with whom they deal or their colleagues) that they have been (or may have been) influenced by a benefit to show favour or disfavour to any person or organization.

Thus members of staff should not accept any gifts, rewards or hospitality (or have them given to members of their families) from any organization or individual with whom they have contact in the course of their work which would cause them to reach a position whereby they might be, or might be deemed by others to have been, influenced in making a business decision as a consequence of accepting such hospitality. The frequency and scale of hospitality accepted should not be significantly greater than the College would be likely to provide in return. In case of doubt members of staff must consult their line managers.



## **Retention of financial documents**

The period for the retaining documents is a complex issue and the most favourable retention period will allow for records to be kept as long as they are really needed for legal and commercial purposes.

A programme should be drawn up to select records that are to be retained or destroyed in order to keep the volume of records under control. The retention policy should be just one of the elements comprised in a much broader programme covering records management.

In determining appropriate retention periods the following aspects need to be considered:

- economy;
- legal and related requirements;
- potential demand within the college; and
- historical value.

There are few firmly established regulations to follow in deciding how long to keep documents. However, this guideline covers recommended minimum retention periods for accounting records to discharge the College's legal and statutory obligations in respect of the various taxing authorities and audit requirements.

### *Accounting Documents*

#### 1. Purchase invoices

All paid invoices are to be retained for 7 years. Once the invoices are one year old then they may be microfiched. Supporting requisitions, purchase orders and goods received notes should be kept for three years.

#### 2. Sales

Copies of all sales VAT documents including sales invoices must be held for seven years, i.e. six years plus the current year.

#### 3. VAT returns

All supporting documentation used to compile the return should be retained for a period of seven years, i.e. six years plus the current year.

#### 4. Banking

For monies paid into the College's bank account copies of all receipt records and banking sheets should be kept for three years. All bank statements for the College bank account should be kept for six years.

#### 6. Payments to Personnel

All documents in support of payments to personnel should be kept for at least seven years, i.e. six years plus the current year.

#### 7. Equipment Registers

Equipment registers (i.e. Fixed Asset registers) should be kept for indefinitely. Copies of asset disposal notes should be kept for three years.

8. Payroll Printouts

The College should keep monthly printouts for one year plus the current year; these should be evidenced as having been checked by the Treasurer.

The above is not meant to be a comprehensive list of all the financial documents held in the College and does not imply that all other documentation can be destroyed.