SPIREVIEW
HOUSING ASSOCIATION

FINANCIAL REGULATIONS

Approval Date: **October 2026**

Review Date: **October 2029**

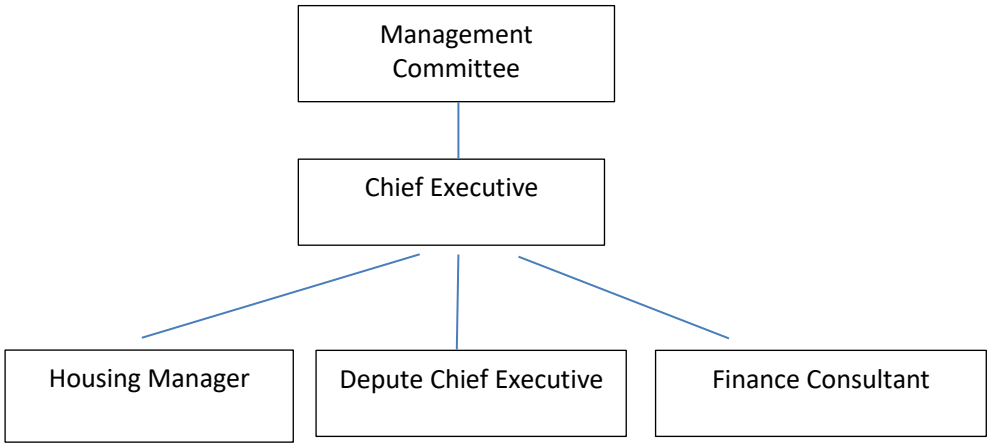
SPIRE VIEW HOUSING ASSOCIATION LTD
Financial Regulations

		PAGE
1.	Introduction	1
2.	Management Committee Responsibilities	2
3.	Staff Officer Responsibilities	2
4.	Accounting	2
5.	Audit Requirements	3
6.	Fraud and Other Financial Irregularities	4
7.	Business Planning	4
8.	Approach to Financial Forecasting	5
9.	Annual Budget	6
10.	Cash Controls	8
11.	Debtors Controls	8
12.	Asset Controls	9
13.	Procurement, Contracts and Tendering	9
14.	New Projects	10
15.	Books, Registers and Computer Data	10
16.	Security	11
17.	Insurances	12
18.	Risk Management	12
19.	Value for Money	13
20.	Treasury Management	13
21.	Travel, Subsistence & Other Allowances	13
22.	Gifts, Hospitality & Interests	13
23.	Donations	14
24.	Benchmarking/Performance Analysis	14
25.	Incurring and Authorising Expenditure	14
26	Write Offs: Delegate Authority	16
Appendix 1 – Authorised Signatories		17
Appendix 2 – Budget Holders		18

1. INTRODUCTION

1.1 The Association must demonstrate effective governance and sound financial management and must have a robust policy and procedural framework that complies with legislation, guidance and good practice.

1.2 Spire View Housing Association Limited's financial regulations are based on the following current management structure: -



1.3 The Association currently operates under the Charitable Model Rules (Scotland) 2020 which are the constitution of the organisation.

1.4 The standing orders of the Association detail how the business of the organisation shall be run and include delegated responsibilities, powers and remits of each committee or sub-committee.

1.5 The financial regulations detail committee and staff responsibilities together with details of generally accepted best practice. They form a part of the overall system of financial and management control and take account of the Scottish Housing Regulator's (SHR) Standards of Governance and Financial Management.

1.6 Compliance with the financial regulations is compulsory for all staff. It is the responsibility of section heads to ensure that all staff are aware of the existence and content of these regulations.

1.7 Training, periodic refreshers/updates for staff should be performed as and when required.

1.8 Nothing in these Financial Regulations shall override instructions from or conditions imposed by the Scottish Government, the Scottish Housing Regulator, the Financial Conduct Authority and the Financial Reporting Council Authority and any other appropriate statutory organisation or any current legislation. Nothing in the supporting financial procedures or policies will override the principles embodied in the regulations.

1.9 The financial procedures set out how these regulations shall be implemented.

1.10 A review of the regulations shall take place at least every 3 years, or earlier if deemed appropriate by the Chief Executive or the Management Committee.

2. MANAGEMENT COMMITTEE RESPONSIBILITIES

2.1 The Management Committee has ultimate responsibility for all aspects of the Association's affairs. It is responsible for the leadership, strategic direction and control of the Association and for ensuring it secures good outcomes for its tenants and service users.

2.2 Statute requires the Management Committee to prepare financial statements for each financial year and it is the Management Committee which is responsible for keeping proper accounting records which disclose with reasonable accuracy at any time the financial position of the Association.

2.3 The Management Committee is also responsible for safeguarding the assets of the organisation and for taking reasonable steps to prevent and detect fraud and other irregularities.

2.4 Committee members have a duty towards the Association, its staff, tenants, other service users and the community in which it operates. They must therefore seek good quality information and advice at all times and ensure their decisions are based on the same. This advice may need to be sought from external professional advisors where necessary. They must also ensure they have the skills and knowledge they need to be effective in their role. They must at all times seek to identify risks to the Association and mitigate the same.

3. STAFF RESPONSIBILITIES

3.1 The Chief Executive is responsible to the Management Committee for the implementation of strategic, policy and procedural decisions taken by the Management Committee and the day-to-day management of the Association. The Chief Executive is also responsible for the promotion of the Association and for co-ordinating the activities of other Senior Officers. The Chief Executive is responsible for ensuring the Management Committee receives all information and relevant guidance and training which it requires to meet its obligations.

3.2 All Senior Staff are responsible for ensuring staff members within their section understand their respective roles and responsibilities and for monitoring their performance against the same. They must ensure they and their staff are open about, and accountable for, all they do. They are responsible for the security and control of all assets, cash and materials relating to their section. They are also responsible for managing the financial budgets allocated to their area of responsibility.

3.3 The responsibilities and duties of all staff members shall be contained within a suitable job description. The responsibilities and duties of any manager are contained within the relevant Minute (s) of Agreement or Service Level Agreement.

4. ACCOUNTING

4.1 All accounting procedures of the Association shall be determined by the Association's Finance Consultant in consultation with the Chief Executive. These procedures must take account of statute, good practice and current guidance.

4.2 The format of the Association's financial records shall be determined by the Association's Finance Consultant in consultation with the Chief Executive and must take account of audit requirements, good practice and current guidance.

4.3 The allocation of accounting duties should where possible take account of segregation of duties and records should be regularly updated.

5. AUDIT REQUIREMENTS

External Audit

5.1 The external auditor will be appointed at each Annual General Meeting, following a recommendation by the Management Committee and in line with the Association's Rules and current statutory requirements.

5.2 The External Auditor will be appointed following a tendering process and in accordance with good practice the Association shall review its external auditors every 5 years unless the service level dictates otherwise.

5.3 The role of the external auditor must be clearly detailed in an Engagement Letter provided by the external auditor that shall be reviewed every three years in accordance with good practice.

5.4 Preparation of the financial statements shall be undertaken by the Association's Finance Consultant. A year end timetable should be completed by the Finance Consultant and be agreed with the external auditor prior to commencement of the year end statutory audit. The financial statements must be in the required format and contain the report of the external auditor. In addition, the financial statements must contain a report from the Management Committee, to include comment on past and future developments, together with a separate Management Committee report on the systems of internal financial control.

5.5 Draft audited financial statements will be presented to the Management Committee for approval at an appropriate meeting. Final audited accounts will be adopted at the Annual General Meeting normally held in September.

5.6 Final audited and signed accounts will be submitted to the Scottish Housing Regulator (SHR), lenders, OSCR and to the Financial Conduct Authority within the required timescales following the financial year end.

5.7 A copy of the auditor's Management Letter and the Management Committees' response to the Management Letter will also be submitted to the Scottish Housing Regulator within required timescales.

5.8 The external audit function shall be overseen by the Management Committee and in line with good practice the Management Committee shall, on request, have a closed-door session, with no staff present, with the external auditor.

Internal Audit

5.9 The internal auditor will be appointed to carry out a rolling programme of reviews of the effectiveness and application of internal controls and procedures, including a regular review of adherence to the Financial Regulations and Financial Procedures.

5.10 The internal auditor will be appointed following a tendering process and will be appointed for a maximum of three years (subject to an annual renewal of the appointment) by the Management Committee.

5.11 A rolling programme for internal audit shall be set out and agreed by the Management Committee based on current risk assessments. The setting of the internal audit programme shall take account of concerns or recommendations from the Management Team.

5.12 The Management Committee will review all internal audit reports and progress reports and will monitor the implementation of all agreed actions within set timescales.

5.13 The internal auditor will have access to all locations, staff, records and physical assets necessary for the performance of their role. Staff will provide the internal auditor with any explanations necessary as part of their review. No limitations will be placed on the scope of their review. Any such limitations will be reported to the Management Committee as soon as is practical.

5.14 The internal auditor may be asked to participate or advise in discussions relating to the formulation and installation of new systems, controls and procedures. Final responsibility for such matters lies with the Management Committee.

5.15 The internal auditor may assist in the protection of the assets of the Association by carrying out regular reviews of operations in order to detect system weaknesses, inefficiencies, fraud, misappropriation and losses due to waste or maladministration. Final responsibility for such matters lies with the Management Committee.

5.16 The internal auditor will also monitor compliance with the Association's Financial Regulations and Procedures as part of their internal audit reviews. Final responsibility for such matters lies with the Management Committee.

6. FRAUD AND OTHER FINANCIAL IRREGULARITIES

6.1 The primary responsibility for the prevention and detection of fraud and errors rest with the Management Committee. The external auditor may plan the external audit in order to have a reasonable expectation of detecting material misstatements in the financial statements, whether caused by fraud or errors.

6.2 To assist in discharging its responsibilities in this area the Management Committee should receive reports from the internal auditor on all cases of actual or attempted fraud or bribery and consider whether internal controls require to be reviewed.

6.3 All matters in relation to fraud prevention, reporting, recording and associated matters are outlined in the Association's fraud policy.

7. BUSINESS PLANNING

7.1 The Association shall have in place a three year business plan document which sets out the strategic direction of the Association. The Management Committee is ultimately responsible for the governance and direction of the Association and it is recognised that the business plan should represent a joint understanding by staff and Committee of what the Association wants to achieve, the choices available and the key risks faced by the Association. The business plan shall therefore be produced by the Management Committee and the Senior Management Team in consultation with staff, tenants and other stakeholders as necessary and in line with the Business Planning Protocol.

7.2 The content of the business plan should recognise and reflect the current SHR's Business Planning Recommended Practice for RSL's. It should include:

- Vision and Values
- Profile of Association and achievements (including analysis of our customer profile, stock, rents, performance and asset management)
- Analysis of the Operating Environment (using PEST, SWOT and Risk Analysis)
- Strategic Objectives
- Annual Delivery plan
- Financial analysis (including scenario planning and sensitivity testing)

7.3 On an annual basis, the Chief Executive has delegated authority for the preparation of a detailed operational plan for the Association on behalf of the Management Committee, within the framework of the business plan.

7.4 The Chief Executive shall produce an annual timetable to accompany the business planning process detailing the stages, processes and responsibilities in order to achieve the timetable.

7.5 The operational plan will set departmental performance targets and KPIs, and shall feed into the annual budget setting process and the Association's risk management procedures.

7.6 On at least a quarterly basis progress against operational targets shall be reported to the Management Committee. These reports shall be supported by the management accounts, other section reports and the risk register to ensure all aspects of the business plan are linked together and operating effectively.

7.7 On at least an annual basis the achievement of strategic objectives will be considered and reported to the Management Committee.

7.8 The Association shall take account of the SHR document on Recommended Practice-Business Planning produced in December 2015 in its business planning process.

8. APPROACH TO FINANCIAL FORECASTING

8.1 The Finance Consultant will assist with the preparation of long-term financial planning on behalf of the Association. The Senior Management Team and Management Committee will be involved in the process with the forecasts requiring approval by the Management Committee.

8.2 Long term financial forecasts shall be prepared in accordance with timescales noted at clause 8.4 and shall, on request, be forwarded to all lenders as well as external and internal auditors for information and consideration.

8.3 The Association prepares and submits 5 year financial projections to SHR in the prescribed format and within the relevant timescales, which have been presented to and approved by the Management Committee, all in accordance with existing guidance from the SHR. A copy of this information shall, on request, be submitted to lenders and the external auditor.

8.4 The Association shall undertake a review of its long-term projections on an annual basis in order to ensure that the projected annual position remains on target with the 30-year statement of comprehensive income, statement of financial position and cash-flow projections. A full and detailed business plan review shall be undertaken annually. Appropriate sensitivity analysis must be applied to the long-term projections with details being incorporated into the business plan document.

8.5 The content of the 30-year financial forecasts shall include the following information as a minimum:

- Details of main assumptions employed and source.
- Statement of Comprehensive Income for 30 years.
- Statement of Financial Position projections for 30 years.
- Cash flow projections for 30 years.
- Key performance indicators data and peer comparisons.
- Covenant compliance schedules.
- Appropriate sensitivity analysis.
- Schedules for all income and cost information and assumptions; and

- Supporting narrative to confirm an overview of the projected outturns, any areas for further consideration, any areas of concern and any actions required that flow from production of the final information.

8.6 While the overall responsibility for this information lies with the finance staff it is essential that an appropriate level of input from all senior staff is accounted for within the long-term financial plans. In particular, the areas of rent levels, rent increases, maintenance costs, staffing levels and costs and future development activity require agreed input.

8.7 Given the impact that inflation and interest rates may have on the expected financial position, the Finance Consultant shall seek information from lenders regarding future expected rates for these areas. In addition, any real cost increase assumptions should take account of lender and valuation advice. All assumptions made in the forecasts should be reviewed and agreed with the Management Committee.

8.8 The Finance Consultant shall produce an annual timetable to accompany the financial forecasting process and this shall take account of:

- Provision of, review and agreement on future maintenance plans.
- Provision of, review and agreement on rental, staffing and development assumptions.
- Production of draft projections.
- Executive team discussion, review and agreement of draft projections.
- Reporting to Management Committee.
- Provision of information to external parties; and
- Feedback to Management Committee from external parties.

8.9 The importance of financial forecasting in relation to the Association's overall business planning process is recognised and timetables applicable to both processes require to be carefully aligned.

9. ANNUAL BUDGET

Preparation, Review and Approval

9.1 An annual budget must be approved by the Management Committee of the Association prior to the start of the financial year to which it relates. The setting of the annual budget forms part of the annual business planning cycle and will reflect the Association's current business plan, operational plans and longer term financial forecasts.

9.2 This annual budget will comprise of:

- A clear statement of main assumptions and sources of information underlying the budget;
- Projected Statement of Comprehensive Income
- Projected Statement of Financial Position
- Projected Cash Flow Statement;
- Detailed capital budgets for all projects;
- Monthly cash flow projections;
- Monthly income and expenditure details;
- Cost allocation information;
- Appropriate ratio analysis;
- Loan covenant compliance performance; and
- Any summary narrative commentary necessary for a clear understanding of the budget

9.3 The budget will be prepared by the Association's Finance Consultant on a zero based basis each year, considering the prior year budget, year to date variances and any known changes linking to the Business Plan. The Finance Consultant will put in place a timetable which will take account of:

- Provision of budget planning information from budget holders;
- Review of planned, cyclical and major repairs to be undertaken in line with the 30 year plan;
- Submission of draft budget to Senior staff and budget holders for review and approval;
- Submission of draft budget to Management Committee for review and discussion including the impact of any options or sensitivities where there is a potential material financial effect over the 12 month period;
- Amendments as a result of Management Committee review; and
- Final approval of the budget by the Management Committee.

Budgetary Control

9.4 Once approved, the budget shall be regarded as the basis for authority to incur expenditure, subject to current Standing Orders, the Scheme of Delegation and any specific exemptions agreed with the Management Committee. It should be recognised that changes in circumstances may result in changes to budgeted expenditure. Such changes must be approved by the Management Committee.

9.5 It is the responsibility of all budgets holders to control relevant budgets. Budgetary control will be assisted by production of quarterly management accounts and accompanying narrative reports comparing actual income and expenditure with budget estimates. The Finance Consultant will report on actual income and expenditure against budget on a quarterly basis to both the Management Team and the Management Committee.

9.6 The Finance Consultant will ensure that material variances (defined as variances exceeding 0.5% of turnover) are clearly explained within the narrative supporting the quarterly management accounts. Explanations of material variances will be sought from budget holders during the preparation of the quarterly management accounts where necessary. The Finance Consultant shall, using their judgement, also highlight any other variances where this is considered appropriate.

9.7 The quarterly management accounts should include the effect of likely future events on the financial position together with details of the currently projected financial position of the Association at the year-end. Cash flow monitoring and covenant compliance will form a part of the management accounts. A copy of the approved budget and quarterly management accounts will, on request, be sent to the Association's lender(s) and external auditor.

9.8 In circumstances of emergency, expenditure may be incurred beyond authorisation levels by obtaining the prior approval of the most senior member of staff on duty and the Chairperson of the Association (or Office Bearer in the absence of the Chairperson), who will consult the Finance Consultant, if possible, before agreeing to any request. Any such expenditure must be reported by the Chief Executive to the next meeting of the Management Committee for retrospective approval.

9.9 Senior Staff should ensure that when reports are issued to the Management Committee, the financial implications of any course of action should be fully detailed. The Finance Consultant should be consulted prior to any report that has material financial implications going to the Management Committee.

9.10 Monthly rental income and maintenance expenditure reports shall be produced by the Housing Management and Maintenance teams and be circulated to all members of the Management Team. The finance team shall undertake a quarterly review of the trial balance income and expenditure for the purposes of budget monitoring and shall maintain a budget variance file in order to advise of projected outturns at the year end.

10. CASH CONTROLS

10.1 Bank accounts held by the Association, details of authorised signatories and cheque signing details are contained within the Association's detailed financial procedures.

10.2 Procedures for the receipt of funds are detailed in Section 5 of the financial procedures.

10.3 A petty cash float not exceeding £1,000 shall be held for the purpose of making small payments and properly authorised expenses. The Finance Assistant has day to day responsibility for petty cash payments. In the absence of the Finance Assistant, the Corporate Governance Manager will assume responsibility for petty cash payments. Petty cash procedures are detailed in the Association's financial procedures.

10.4 All bank accounts and petty cash accounts must be reconciled to the relevant books of account by the Finance Assistant on a monthly basis. These reconciliations shall be reviewed and certified as accurate by the Association's Finance Consultant.

10.5 The Finance Assistant shall make arrangements for the safe custody of all banking documents including cheques.

10.6 In the event of any supplier bank account being notified by e-mail the finance team shall contact the payee directly and request written confirmation of the change.

10.7 All incoming post must be opened by one member of staff. Any cheques or cash received should be recorded on an incoming mail register and passed to the Finance Assistant to review and verify.

11. DEBTORS CONTROLS

11.1 The Association acknowledges the requirement to maximise income collection in order to generate as much income as possible via interest receipts.

11.2 Where external funding for projects is made available to the Association all grant claims must be submitted timeously in order to ensure receipt of funds prior to payment (where allowed) or as soon as possible (in line with grant offer conditions) after payment has been made.

11.3 Rental income payments are the main source of revenue income for the Association and operational procedures shall be reviewed regularly in order to monitor their effectiveness. A monthly report on rent arrears shall be prepared by the Housing Manager, be circulated to the management team (who should review and instruct any further action as necessary) and be reported quarterly to the Management Committee.

11.4 All other sums due and outstanding to the Association shall be summarised within the quarterly management accounts. Such sums shall include; insurance claims outstanding, chargeable repairs and improvement works for owners.

11.6 Procedures relating to rents and other income generating areas shall incorporate information on debtor control including the basis for monitoring and reporting sums due.

11.7 All amounts written off as irrecoverable must be formally reported on and approved by Management Committee prior to the balances being written off.

11.8 Responsibility for Debtors control within the Association is as follows: -

(i) Rent Arrears – Housing Manager
(ii) Insurance Claims outstanding – Depute Chief Executive
(iii) Wider Action Claims outstanding – Chief Executive
(iv) All other sums due – Chief Executive

12. ASSET CONTROLS

12.1 The originals of all title deeds shall be held in secure storage by the Association's solicitors or bankers. The finance team will maintain a register of all title deeds.

12.2 The Association shall maintain a fixed asset register detailing all furniture, fittings and equipment and other items classed as capital assets, owned by the organisation. The register should detail acquisition date, disposal date, estimated useful life for depreciation purposes and cost. In addition, copies of invoices relating to each asset purchased shall be contained within the register, which may be held in electronic format.

12.3 The Association shall undertake an annual review of the register to verify continued ownership and existence of these fixed assets. This task shall be undertaken by the Finance Consultant.

12.4 Equipment Maintenance contracts and leasing contracts shall be entered into for such fixed assets as appropriate and a separate register shall be held by the Association. Details to be inserted on these registers include; service provider, start date, termination date, and asset being maintained/leased and cost. This register shall be updated on a 6 monthly basis by the finance team and held in an electronic format.

12.5 Details of any asset/equipment disposals, including details of sums received (if applicable), shall be reported to and authorised by the Management Committee.

12.6 The Finance Consultant will ensure a register of all properties owned by the Association is maintained and kept up to date. The housing properties register shall ensure the Association complies with the requirements of component accounting. The current housing register used by the Association is known as the component accounting spreadsheet.

12.7 This holds records of all housing assets by phase, split into relevant components. Component and property replacements and disposals, along with depreciation charges of housing property assets shall be updated on the component accounting spreadsheet in a timely manner. Copy invoices for all replacements will be kept in a file within the finance department. This task is undertaken by the finance team on an annual basis. These updates and the resultant journals shall be reviewed by the Finance Consultant.

13. PROCUREMENT, CONTRACTS AND TENDERING

13.1 All works, goods and services will be procured in accordance with the terms of the Association's Procurement Policy.

13.2 Where necessary, quotations or tenders for goods or services will be obtained, according to the financial limits as detailed in the Procurement Policy.

13.3 Orders for works, goods and services will be in accordance with current procedures, in particular the budget limits and the regulations on Incurring and Authorising Expenditure.

13.4 All contracts entered into by the Association require the authorisation of the Management Committee.

13.5 Where contracts for new-build or maintenance projects, or for annual services, provide for payment to be made by instalments, the finance team and Depute Chief Executive shall keep records detailing the position of accounts on each contract, together with any other payments and the related professional fees.

13.6 Payment to contractors, whether on account or the final account, shall be made in accordance with current procedures. The Finance Consultant shall meet regularly with the Depute Chief Executive to monitor expenditure on contracts.

13.7 The Management Committee shall be provided with quarterly updates on the progress of all contracts, including a summary of the position of accounts on each contract.

13.8 The Association shall take account of EU Procurement thresholds as appropriate. When required and following approval by the Management Committee a procurement consultant may be used to ensure the Association complies with all applicable Procurement legislation and requirements.

14. NEW PROJECTS

14.1 Prior to committing the Association to any new projects or activities a full options appraisal and financial assessment shall be carried out and reported to the Management Committee for consideration and approval.

14.2 In the event that the new project or activity results in a net financial cost to the Association then the overall impact on the Associations long term financial projections requires to be considered and reported on as part of the overall assessment report.

14.3 External specialist and legal advice shall be taken where appropriate.

15. BOOKS, REGISTERS AND COMPUTER DATA

15.1 As a minimum requirement the following books and registers must be maintained by the Association: -

Books and Registers	Staff Member Responsible
Cashbook	Finance Assistant
Petty Cash Book	Finance Assistant
Nominal Ledger	Finance Consultant
Purchase Ledger	Finance Consultant
Rent Ledger	Finance Consultant
Fixed Asset Register – Housing	Finance Consultant
Fixed Asset Register - Other	Finance Consultant
Register of Disposals	Chief Executive
Register of Frauds	Chief Executive
Register of Payments and Benefits	Chief Executive
Register of Interests	Chief Executive

Register of Members	Chief Executive
Register of Gifts and Hospitality	Chief Executive
Tender Register	Chief Executive
Complaints Register	Chief Executive
Register of Title Deeds	Chief Executive

15.2 Responsible staff member refers to individual having responsibility for maintenance of and administration relating to each register. This responsibility may be delegated to another staff member by the responsible staff member.

15.3 All such books and registers together with other relevant papers or information may, where appropriate, be kept in an electronic format and must be securely stored when not in use.

15.4 In conducting its operations the Association must comply with all aspects of Data Protection Legislation and Regulations. All such matters are the responsibility of the Chief Executive.

15.5 The Association's IT co-ordinator is the Chief Executive. The systems administrator is the Chief Executive and user rights are noted within the Association's IT policy.

16. SECURITY

16.1 All Senior Staff are responsible for maintaining proper and adequate security at all times for buildings, furniture, equipment, and other assets, and any cash under their direct control. The Chief Executive is responsible for overall security and any risks to the Association must be notified to the Chief Executive immediately.

16.2 All information held on computer must be backed up on a daily basis and stored off-site. It is the responsibility of the Chief Executive to ensure this task is undertaken.

16.3 Access to computer systems must be restricted by the appropriate use of passwords. A formal password policy should be in place and enforced and be contained within the Association's IT policy.

16.4 The Chief Executive will ensure that there are adequate systems in place covering the security and use of all data (personal and sensitive information) relating to applicants, tenants, members of staff, contractors and of the public held either in electronic or paper format, to comply with Data Protection Legislation and Regulations.

16.5 All current staff members are office key holders. All personnel holding keys are responsible for their safe keeping.

16.6 The petty cash tin will be held in the office safe at all times unless in use. The keys to the petty cash tin are held by the finance team in a locked drawer.

16.7 Access to the safe is restricted to the:

- Finance Consultant
- Finance Assistant
- Corporate Governance Manager
- Chief Executive
- Depute Chief Executive
- Housing Manager

16.8 The safe is accessed via a key lock.

16.9 Under no circumstances should other staff members be given access to the safe, told the location of the key, or retain possession of the petty cash tin keys. In all cases petty cash keys must be retained in the possession of the authorised staff member who, under no circumstances, should leave keys unattended.

16.10 A register shall be maintained by the Finance Assistant, of all items held within the safe. Documents should be signed out when removed by an authorised member of staff and signed back in when returned. A regular check should be made by the finance team to ensure all items are present in the safe.

16.11 The loss of office, property or petty cash keys must be notified to the Chief Executive immediately.

17. INSURANCES

17.1 All senior staff of the Association shall advise the Depute Chief Executive in writing of events likely to result in a change to the Association's insurance requirements.

17.2 The Depute Chief Executive, in consultation with the management team, shall review all insurances during the year and report to the Management Committee thereon.

17.3 The submission of all property insurance claims is the responsibility of the Property Maintenance Team. All other claims shall be dealt with by the Depute Chief Executive and the finance team shall record, monitor and control all insurance claims.

17.4 The Employer's Liability Insurance Certificate will be displayed in the public reception area for each place of business.

17.5 The Association shall ensure, prior to contracts commencing, that written agreement is received from external contractors that they shall insure and take responsibility for all works in progress. A copy of the insurance cover in place must be received by the Association in advance of such works commencing.

18. RISK MANAGEMENT

18.1 The Association's approach to managing risk is detailed within the Risk Management Policy.

18.2 All current activities, and proposals for new activities, will be subject to a risk assessment as specified in the Risk Management Policy and Strategy.

18.3 Where potential risks are identified the activity will be included in the current Risk Matrix together with measures to eliminate or minimise the risk.

18.4 The Chief Executive will provide the current risk matrix and a report to the Management Committee at least every six months, providing an update regarding progress to mitigate the key strategic risks to the Association.

19. VALUE FOR MONEY

19.1 The Association shall seek to obtain value for money in terms of any fixed asset investments, its contractual commitments and in its day-to-day operational activities. Returns on investments shall be managed in line with the Treasury Management Policy.

19.2 The selection of an appropriate method of procurement, the use of tendering procedures, the selection of appropriate financing options and a balancing of quality and cost or other appropriate cost benefit analysis shall be undertaken by the Association in its decision-making process.

20. TREASURY MANAGEMENT

20.1 The Association will comply with the Chartered Institute of Public Finance & Accountancy (CIPFA) Treasury Management in the Public Services: Code of Practice and cross Sectorial Guidance Notes (2021 Edition), (the Code).

20.2 The Association will create and maintain as the cornerstone for effective treasury management.

- A treasury management policy statement stating the policies objectives and approach to risk management of its treasury management activities
- Suitable treasury management practices (TMP's), setting out the way the Association will seek to achieve those policies and objectives and prescribing how it will manage and control those activities

The content of the policy statement and TMP's will follow the recommended contained in sections 6 & 7 of the code, subject only to amendment where necessary to reflect the particular circumstances of the Association. Such amendments will not result in the Association materially deviating from the Code's key principals.

20.3 The Associations Management Committee will receive reports on its treasury management policies, practices and activities, including as a minimum, an annual strategy and plan in advance of the year, a mid-year review and an annual report after its close in the form of prescribed in it TMP's.

20.4 The Association delegates responsibility for the implementation and regular monitoring of its treasury management policies and practices to the Finance Consultant and for the execution and administration of treasury management decisions to the Management Committee.

21. TRAVEL, SUBSISTENCE & OTHER ALLOWANCES

21.1 All claims for payment of car allowances, subsistence allowances, travelling and incidental expenses shall be authorised and paid in accordance with the Association's policies and procedures on Committee Members' and Staff Expenses.

21.2 All claims for payments of travel, subsistence and other expenses will require to be authorised in accordance with the current financial procedures.

22. GIFTS, HOSPITALITY & INTERESTS

22.1 The giving and receiving of gifts and hospitality shall be in accordance with the Association's Entitlements, Payments and Benefits Policy.

22.2 All Committee members and staff shall ensure that they declare any interest with regards to any aspect of the Association's activities as required by the Association's rules and

regulatory requirements. The Chief Executive shall maintain a register of interests in accordance with the Association's Entitlements, Payments and Benefits Policy.

23. DONATIONS

23.1 The Association's approach to donations is detailed within the Donations Policy.

23.2 All donations must be approved by either the Chief Executive or the Management Committee, as outlined in the Charitable Donations Policy.

24. BENCHMARKING AND PERFORMANCE ANALYSIS

24.1 The Association's Chief Executive shall ensure that reports will be submitted to the Management Committee on the following areas: -

(a) Analysis of Business Plan targets achieved
(b) Comparison of results with the SHR published ratios and statistics
(c) Comparison of results with the Association's annual budget;
(d) Comparison of actual and estimated loan covenant results; and
(e) Annual Return on the Charter (ARC).

The Association's Management Committee may consider issues arising from the above in greater detail.

24.2 All senior staff are responsible for the provision of information attaching to their department in line with an agreed timetable confirmed by the Chief Executive and included within the operational plan. Section Heads, when providing relevant data or statistics summaries, shall email the detailed calculations or file attachments that represent the source of the summary data or statistics provided. The Chief Executive or a delegated representative shall audit relevant information provided in order to ensure accuracy and consistency of reporting.

25. INCURING AND AUTHORISING EXPENDITURE

25.1 Only those staff with the delegated authority to do so will incur an expenditure commitment or authorise a payment. No payments will be made unless the payment has been checked and signed off by those with the appropriate authority.

25.2 The Management Committee approve budgets prior to the beginning of the financial year and staff have delegated authority to spend within these budgets subject to Standing Orders and the current Scheme of Delegated Authority.

25.3 Any non-emergency expenditure (including contract variations) up to £10,000 in total in excess of set budgetary limits may be approved by the Chief Executive who shall report such matters for retrospective approval to the next Management Committee.

25.4 There are three levels of procedures involved in authorising expenditure.

a) taking on the commitment to spend.
b) certification that the expenditure is arithmetically correct; and
c) approving the invoice after goods or services received.

b) & c) are covered within the Financial Procedures.

25.5 Approval of Commitment to Spend

i) <u>Capital Expenditure (excluding properties, including IT, motor vehicles, copiers etc)</u>

a)	Under £10,000	Chief Executive
b)	Over £10,000	Management Committee

ii) Capital Expenditure (properties)

a)	Purchase of a property	Management Committee
b)	Consultants Fees / Works Costs within approved contract sums	Depute Chief Executive
c)	Component replacement costs within agreed contract sums	Depute Chief Executive

iii) Staff Appointments, Salaries & Staff Costs

a)	Staff appointments	Chief Executive / Management Committee
b)	Temporary Staff	Chief Executive
c)	Annual Salary Reviews	Management Committee
d)	Staff Expenses	Chief Executive
e)	Committee Expenses	Chief Executive
f)	Chief Executive Expenses	Chairperson
g)	Overtime	Chief Executive
h)	Overtime of Chief Executive	Chairperson
i)	Redundancies, settlements etc	Management Committee

iv) Property Management Costs

a)	Repair & Maintenance up to £1,000	Maintenance Officer
b)	Repair & Maintenance up to £5,000	Depute Chief Executive
c)	Repair & Maintenance up to £10,000	Chief Executive
d)	Repairs & Maintenance over £10,000	Management Committee

v) Office Administration & Other General Expenses

a)	Up to £500	Corporate Governance Manager
b)	Up to £10,000	Chief Executive
c)	Over £10,000	Management Committee

vi) Housing Management

a)	Legal Fees up to £500	Housing Officers
b)	All costs up to £10,000	Chief Executive
c)	All costs over £10,000	Management Committee

The above noted individuals have the same authority levels for authorising invoices for payment.

26. WRITE OFFS: DELEGATED AUTHORITY

26.1 The Chief Executive is authorised to approve the write-off of low value debts within delegated authority limits. In the event the Chief Executive is absent, the Depute Chief Executive has delegated authority to write-off low level debts.

26.2 Write-off approval is permitted for amounts not exceeding £150 per individual case in respect of:

- Former tenant Rechargeable repairs;
- Former tenant Legal expenses; and
- Former tenant Rent arrears.

26.3 All write-offs approved under delegated authority must be supported by appropriate documentation, including details of the balance, recovery action undertaken and the rationale for the write-off.

26.4 Any balances exceeding the delegated limit of £150 shall require approval from the Management Committee in accordance with these Financial Regulations.

Appendix 1

Authorised Signatories

BACS Payment List	
Prepared by	Finance Assistant
Authorised by	Chief Executive / Depute Chief Executive / Housing Manager
BACS Payment (Online Banking)	
Prepared by	Finance Assistant
Authorised by	Chief Executive / Depute Chief Executive / Housing Manager
Cheque Payments	
Prepared by	Finance Assistant
Authorised by	Chief Executive / 3 Committee Members
Grant Offers	
Authorised by	Chief Executive
HAG Claims	
Prepared by	Finance Assistant
Authorised by	Chief Executive / Depute Chief Executive
Private Finance Drawdown	
Prepared by	Finance Consultant
Authorised by	Chief Executive / Depute Chief Executive
Scottish Government Grants	
Prepared by	Finance Assistant
Authorised by	Chief Executive / Depute Chief Executive

A copy of all sample signatory forms issued to third parties must be retained by the Finance Team.

Appendix 2

Budget Holders

Chief Executive	Employee Costs Heat & Light Advertising Telephone & Postage Staff Training Committee Training & Expenses Conferences & Seminars Legal & Professional Fees Audit Fees (Internal & External) Internal Audit Equipment Leasing Promotion & Publicity Rates & Insurance Bank Interest & Charges Subscriptions General Expenses Community Fund Stationery & Printing Wider Role
Depute Chief Executive	Current Repairs Cyclical Repairs Property Insurance Void Maintenance Landlord Supply Close Improvements Close Cleaning Major Repairs Office Repairs & Maintenance
Housing Manager	Tenant Organisations