

The Minerva Learning Trust



FINANCIAL PROCEDURES POLICY

**Minerva Learning Trust
Bridport Primary School
Burton Bradstock CE Primary School
St Mary's CE Primary School
The Sir John Colfox Academy**

**Kay Taylor, Executive Principal
Debbie Brown, Headteacher
Claire Staple, Headteacher
Helen Farmer, Headteacher
David Herbert, Headteacher**

Policy Written by

The Minerva Learning Trust

**Ratified by
The Minerva Learning Trust Board**

June 2016

Date for Review

June 2017

Signature of Chair

The relationship between the Multi Academy Trust (**MAT**) and the Secretary of State is set out in the Funding Agreement (**FA**) which is a legal document. The Academies Financial Handbook (**AFH**) contains information on the duties and obligations of the MAT arising from the **FA**.

The objectives of this policy are to ensure that the MAT maintains and develops systems of good financial control and management by setting guidelines for the establishment of sound and effective financial procedures through:

- establishing proper financial management arrangement and accounting procedures, in line with the Education Funding Authority (EFA) Academies Financial Handbook; (AFH);
- maintaining a reliable system of internal controls;
- ensuring that resources are properly allocated and that the principle of best value is adopted;
- outlining the areas of responsibility within the schools;
- ensuring that the requirements of accountability are fulfilled;
- ensuring appropriate training is undertaken by budget holders.

The MLT aims to operate in a transparent, ethical and accountable way which will promote effective management.

1 Responsibilities

1.1 **The Board of Trustees** has overall responsibility for the administration of the MLT's finances. The main responsibilities are prescribed in the FA between the MLT and the DfE and in the AFH. On appointment all Trustees are issued with a copy of the AFH and Trust's Governance handbook which details the delegation of roles and responsibilities to the Trust Board's Committees.

The main responsibilities are to:

- ensure grants from the EFA are used for the purpose intended
- approve of a balanced budget for the financial year
- notify the EFA within 14 days if school of MLT is formally proposing to set an in year deficit revenue budget
- appoint Accounting Officer
- appoint Financial Director
- establish the financial limits of delegated authority (appendix 1)
- immediately notify the EFA of the removal or resignation of the auditors
- report any instances of fraud over £5,000 to the EFA
- review and agree the Executive Head's salary and expenses
- notify EFA's chief executive in writing of the vacating or filling of the positions of chair of the board of trustees, accounting officer or Finance Director.
- approval of MLT Budgets and Improvement Plans

1.2 **The Finance Committee** will meet at least once a term, but more frequent meetings will be arranged as necessary. The main responsibilities include:

- the initial review and authorisation of the annual budget
- the regular monitoring of actual expenditure and income against budget and taking appropriate action to maintain a balanced budget
- ensuring the annual reports are produced in accordance with guidelines issued by EFA
- authorising changes to the academy personnel establishment
- authorising the award of contracts over £100,000
- reviewing the internal audit reports on the effectiveness of the financial procedures and controls
- maintaining oversight of the MLT's internal controls and value for money framework
- oversight of the management of the budget by LGBs.

1.3 **The Audit Committee has responsibility for:**

- recommending to the Members the appointment, re-appointment or removal of the external auditors and report to the EFA
- Reviewing the findings of the external auditors and recommending to the Trust Board an action plan arising from it
- ensuring that suitable accounting records are maintained and providing publicly accessible accounts in line with the Statement of Recommended Practice (SORP) for Charities and ensuring the audited accounts are filed with Companies House
- identifying the risks to internal financial control across the Trust and agreeing a programme of work that will address these risks, informing the statement of internal control and, so far as is possible, providing assurance to the external auditors and investigating on behalf of the board any financial or administrative matters that may put the Trust at risk. Examining reports on special investigations and advising the board of Trustees accordingly
- driving the process for independent checking of financial controls, systems, transactions and contracts. It should ensure that arrangements for protecting the Trust's assets are in place and recommend the appointment, re-appointment or removal of Internal Auditors;
- encouraging a culture within the Trust whereby each individual feels that he/she has a part to play in guarding the probity of the Trust and is able to take any concern or worries to an appropriate member of the management team or in exceptional circumstances directly to the Chair of the Audit Committee or the Chair of the Trust Board

1.4 **The Local Governing Body has responsibility for**

- ensuring financial security by setting the budget and monitoring spending
- ensuring value for money
- managing risk and overseeing that money is well spent (see section 5)
- working with the Executive Principal, Headteacher, Finance Director in preparing the draft budgets of their schools

1.5 **The Executive Principal will be designated as the Academy's Accounting Officer for the MLT and will have overall responsibility for the schools' activities and is therefore responsible to the Trust Board for the financial management of the schools.**

The main responsibilities of the Executive Principal are to:

- provide the Trust Board with financial advice
- examine reports on special investigations and advise the board of Trustees accordingly
- ensure accounts are prepared and maintained as required by the Trust Board and EFA
- approve any significant changes in the staffing structures
- authorise contracts up to £15,000
- sign cheques in conjunction with the Finance Director or other authorised signatories
- discuss budget setting and priorities with Leadership Team and incorporate in the MLT Improvement Plan.
- ensure financial processes and reporting are in line with the AFH

- 1.5 **The Finance Director** works in close collaboration with the Executive Principal through whom she is responsible to the Trust Board. The Finance Director also has direct access to the Trust Board via the Finance and Audit Committee.

The main responsibilities of the Finance Director are to:

- manage the day to day financial issues, including the establishment and operation of a suitable accounting system
- prepare and obtain approval for the annual budget
- manage the MLT's financial position at a strategic and operational level within the framework for financial control determined by the Trust Board
- maintain effective systems of internal control
- prepare monthly management accounts
- authorise orders up to £15,000 in conjunction with budget holders
- sign cheques in conjunction with the Executive Principal or other authorized signatory
- ensure forms and returns are sent to the EFA in line with the timetable in the EFA guidance
- liaise with auditors

- 1.6 **Headteachers** are responsible to their Local Governing Bodies and the Executive Principal for:

- preparing and maintaining budgets within their authorisation limits
- approving new staffing appointments within the authorised staffing structure
- authorising expenditure up to £15,000
- costing developments in the School Improvement Plan

- 1.7 **Other staff** primarily the Senior Finance Officer and budget holders, will have some financial responsibilities and these are detailed in the following sections. All staff are responsible for the security of MLT property and avoiding loss or damage, for ensuring economy and efficiency in the use of resources and for the conformity with the requirements of the MLT's financial procedures.

- 1.8 **The Scheme of Delegation** in the Governance Handbook sets out the authorisation limits. (see appendix 1)

2. **Financial Planning**

- 2.1 The LGB's will prepare and monitor their individual school financial plans to ensure the on-going health of the academy. The Trust Board will annually approve a **balanced budget**.

- 2.2 The Trust Board and Finance committee will:

- ensure good financial management and effective internal controls;
- comply with the funding agreement and EFA Academies Financial Handbook
- receive and consider information on financial performance at least three times a year, and take appropriate action to ensure ongoing viability

- 2.3 The budget is the financial dimension of the MLT's Improvement Plans. By identifying and allocating financial resources, the Trust Board will prioritise its targets and objectives and facilitates the achievement of its educational aims. By monitoring progress against budget the Trust can react promptly to variations against the plan to avoid deficits or excessive surplus balances.

Activity	Detailed task	Responsibility and other supports
Planning the budgets	To estimate allowance, income, grants, etc	Executive Principal, Headteachers, Finance Director
	To identify and propose priorities in relation to the MLT and Academy Improvement Plans	Executive Principal, Trust Board, Headteachers, LGB, SLT, Finance Director
	To develop MLT Improvement Plan and the Improvement Plan of each Academy	Executive Principal, Trust Board, LGB
	To review and propose changes in staffing needs	Headteachers, LGB, Executive Principal, Finance Director,
	To draft budget options	Finance Director
	To evaluate budget options in relation to MLT and Academy Improvement Plans	Executive Principal, Headteachers, Finance Committee
	To prepare final MLT balanced budget	Finance Director, Executive Principal
Approving the MLT budget	To propose final budget draft To agree final balanced budget	Executive Principal Trust Board
Monitoring and reviewing the MAT budget	To produce and review monthly summary and detailed management accounts.	Executive Principal, Finance Director
	To monitor monthly reports	LGB's Finance Committee
Virements	To recommend virements	Executive Principal, Headteachers, Finance Director
	To approve virements	Executive Principal, Headteachers/LGB/ Trust Board (see limits) (appendix 1)

3. Risk Management

- 3.1 The Trust Board's committees review and advise on risk management. A risk management framework, register and policy have been developed and will be reviewed regularly by responsible appropriate committees and annually by the Audit Committee.
- 3.2 The MLT insurance cover is reviewed annually by the Leadership team and the Finance Committees for approval by the Trust Board.
- 3.3 The Trust Board is aware that they should notify the Secretary of State of any instances of fraud or theft where the value exceeds £5,000.
- 3.4 The Trust Board will review annually its contingency and business continuity plans setting out what it would do to ensure its continued operation.

4. **Payroll**

Payroll is contracted to Dorset County Council. The MLT is responsible for:

Activity	Detailed Task	Responsibility
Staff Contracts	Ensuring all forms are completed during recruitment together with any variations of contract and are sent to DCC for processing. Once DCC have set up the contract, check on DES that the details are correct.	Headteacher, Personnel Officer
Weekly/monthly returns	Complete overtime claims and supply teacher claims and send to DCC to meet payroll deadlines. Complete monthly staffing return indicating starters, leavers and sickness or other absence. If applicable, to complete absence insurance claims.	Finance Officer, HR Officer HR Officer
Monthly payroll printout	Check monthly printout for irregularities, including staff that have left or are not employed by the school. If actual payroll expenditure is different from budget, investigate any discrepancies. Monthly payroll printouts to be agreed and signed off by the headteachers.	HR/Finance Officers Finance Officer/Headteachers
Nominal Roll	Check staff contract details are correct.	HR/ Finance Officers

5. **Purchasing**

- 5.1 Purchasing procedures have been put in place to ensure that schools follow the fundamental principles of probity, accountability and value for money.
- 5.2 Segregation of duties is used wherever possible: requisition orders are placed by the Finance Officer and authorised by the Finance Director/ Headteacher. Invoices are processed by the Finance Officer and cheques are signed by the Finance Director/Executive Principal/Headteacher

- 5.3 The schools are careful to apply the principles of best value for money by using known suppliers with proven capacity to provide quality, quantity and timely delivery at a competitive price.
- 5.4 Non-order invoices are discouraged as much as possible. E-purchasing and telephone orders should always be authorised beforehand and supported by the issue of an official order.
- 5.5 Budget holders are responsible for the management of their budget account within the limit of their budget and in relation to the MLT and School Improvement Plans.
- 5.6 All purchases estimated to be above £20,000 should be put to tender. The Finance Director should ensure that at least three contractors are invited to submit tenders. Three quotations should be sought for estimates of £5,000 and up to £20,000. Estimates under £5,000 should follow the principles of best value for money.
- 5.7.1 The MLT must pay no more than “costs” for goods or services provided to it by a connected person (‘services’ do not include services provided under a contract of employment) the following are defined as a connected person:
- any member or trustee of the academy trust;
 - any individual or organisation connected to a member or trustee of the academy trust.
 - a relative of the member or trustee. A relative is defined as a close member of the family, or member of the same household, who may be expected to influence, or be influenced by, the person. This includes, but may not be limited to, a child, parent, spouse or civil partner;
 - an individual or organisation carrying on business in partnership with the member, trustee or a relative of the member or trustee;
 - a company in which a member or the relative of a member (taken separately or together), and/or a trustee or the relative of a trustee (taken separately or together), holds more than 20% of the share capital or is entitled to exercise more than 20% of the voting power at any general meeting of that company;
 - an organisation which is controlled by a member or the relative of a member (acting separately or together), and/or a trustee or the relative of a trustee (acting separately or together). For these purposes an organisation is controlled by an individual or organisation if that individual or organisation is able to secure that the affairs of the body are conducted in accordance with the individual’s or organisation’s wishes;
 - any individual or organisation that is given the right under the Trust’s articles of association to appoint a member or trustee of the MLT; or anybody **related to** such individual or organisation;
 - any individual or organisation recognised by the Secretary of State as a sponsor of the MLT; or anybody **related to** such individual or organisation.

A body is related to another individual or organisation if it:

- is **controlled** by the individual or organisation;
- controls the organisation; or
- is **under common control** with the individual or organisation.

For these purposes **control** means:

- holding more than 20% of the share capital (or equivalent interest); or
- having the equivalent right to control management decisions with regard to the body; or

- having the right to appoint or remove a majority of the board or governing body.

The MLT will ensure that any agreement with individuals or organisations referred to above to supply goods or services to the trust is properly procured with supporting documentation.

Activity	Detailed task	Responsibility
Placing orders	Requisition orders	Budget holders
	Responsible for agreeing on requisition orders within limit of account budget	Headteacher/Finance Director
	Responsible for agreeing orders above limit of account budget	Executive Principal/Finance Director
	Responsible for agreeing purchase above delegated limit	Finance/Audit Committee
	Responsible for obtaining quotes	Finance Officer/Business Manager
	Responsible for seeking tenders	Finance Director
	Responsible for placing official orders	Finance Officer
Deliveries	Responsible for checking delivery against order	Budget holder
	Responsible for returning and/or exchanging goods	Finance Officer

6. **Income**

- 6.1 Coding of all income is determined by the Finance Officer on receipt. Where the source is not clear this should be flagged to the Finance Director for resolution. Earmarked funds will be restricted to the purpose for which they have been awarded.

6.2 Any income generated through the hire of the school premises must support management of the school budget. Opportunities for maximisation of income will be identified and supported.

6.3 The charging policy is the responsibility of the LGB and lettings fees are regularly reviewed. Individual schools will have a letting policy which establishes the conditions for letting its premises. Records are kept of bookings and invoices. A letting contract establishes the condition of let for each individual hirer.

Activity	Detailed task	Responsibility
Lettings fees	Establishment of charging policy	LGB
Letting Contracts	Authorisation of lettings	Headteacher
	Preparation of individual letting contracts	Finance Officer
Booking and Invoicing	Monthly preparation of booking forms and invoicing	Finance Officer

6.4 The Business Manager will manage the cash position, avoid going overdrawn, and reconcile bank and control accounts regularly.

6.5 Cash handling should be kept to a minimum and whenever possible and practical, transactions should be done by BACS payments or cheques. Monies should be kept in a safe and secure place and promptly paid into the bank accounts. Cash is usually collected for the following purposes:

- field trips
- revision guides
- lettings
- fund raising

Cash received should be promptly counted by the Finance Officer and put away in the fire proof safe. Income will be collected from schools on a weekly basis and a secure weekly cash collection service will be used to transport funds to the bank from the Central Finance Office.

Petty cash money should be kept to a minimum. All expenditure should be supported by receipts identifying any VAT paid. Payment from the petty cash fund should be limited to minor items which have been approved in advance by the budget holder. Petty cash expenditure on individual items should not exceed £20.

The following guidelines should be followed when handling cash:

- avoid counting cash in public
- avoid leaving cash unsecured in an unattended area or room
- use the fire proof safe to store large amounts of cash

Activity	Detailed task	Responsibility
Collection of money	Collection of money for trips and visits	Finance Officer/Student receptionist
	Collection of money from lettings	Finance Officer
	Collection of money for fundraising, donations, and other sources	Pastoral/Admin Assistant, Finance Officer
Cash received	Counting and recording of money	Finance Officer
	Preparing banking	Finance Officer
	Transporting cash to bank	Cash collection service
Petty cash management	Access to petty cash fund	Finance Officer
	Payment from petty cash fund	Finance Officer
	Recording of petty cash fund expenditure and receipts	Finance Officer
Cash flow forecasts	Preparation of monthly forecasts	Finance Director

- 6.6 The MLT aims to manage its cash balances to provide for the day-to-day working capital requirements of its operation, whilst protecting the long-term value of any surplus cash balances against inflation. Surplus cash balances will be invested to optimise returns, subject to the approval of the Finance Committee, to ensuring that the investments are such that there is no risk to the loss of these cash funds. Cash surplus funds may only be invested in interest bearing deposit accounts of high street banks or other authorised institutions defined by the Financial Services Authority.

7. Reconciliation of Account and Reporting

- 7.1 The school needs to continually monitor its financial progress and report on it to various bodies, such as the Trust Board, LGB, EFA, OFSTED and DfE. Information gathering is an important factor in the effective management of the school's finances. The list of reports, claims and returns, and their submission deadlines, are defined by the EFA or the DfE.
- 7.2 The MLT **must** prepare an annual report and accounts, incorporating accounting policies approved by the board of trustees, and have them audited by a statutory auditor.

- 7.3 A register should be kept of companies or individuals from which the academy may purchase goods or services. The register is published on the MLT's website, and open to public inspection. The register should include all business interests such as directorships, share holdings or other appointments of influence within a business or organisation which may have dealings with the MLT. The disclosure should also include business interests of relatives such as parents, spouse where influence could be exerted over a Trustee or governor or a member of staff by that person.
- 7.4 The MLT has a Whistleblowing Policy in place, and will make sure all staff are aware to whom they can report their concerns, and the way in which such concerns will be managed.
- 7.5 As part of the school's commitment to openness and transparency, an annual updated Gifts and Hospitality Register will be maintained and made available for public inspection. The reporting of gifts and hospitality should be done by using the form at appendix 2 (copies also available from the school offices), which should be signed by the Headteacher and forwarded to the Finance Director for retention on the Gifts and Hospitality Register. Any gift or hospitality offered to an employee or member of the LGB, or Trust Board, by a person or body who has or seeks dealings with the Minerva Learning Trust **MUST BE REFUSED**. The exception to this rule are modest gifts of a promotional character such as diaries and calendars and modest personal gifts from parents as thanks to teachers. A gift or form of hospitality may be considered inappropriate where the school or individual would be embarrassed should the proposed action become public knowledge.
Examples of inappropriate gifts:
Cash or cash equivalents of any amount, vouchers or subscriptions, alcohol.

Activity	Detailed task	Responsibility
Reconciliation of bank statements	Monthly reconciliation of bank statement for LMS and School Fund accounts. Investigation of discrepancies.	Business Manager
VAT return	Monthly preparation of VAT return	Business Manager
	Agreed and submitted	Finance Director
Reconciliation of payroll	Monthly reconciliation of payroll with information sent by DCC	Finance Officer, HR Manager Business Manager
Absence insurance claims	Monthly preparation of absence claims for personnel on sick leave	HR Manager
	Agreed by	Headteacher
Travel claims	Checking travel claims prepared by claimant	Finance Officer
	Agreed by	Headteacher
CENSUS	Annual pupil census preparation	Admin Officer
	Agreed by	Headteacher
Risk Register	Annual Review of Risk	Finance/Audit

	Register	Committee
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8. Staff Reimbursement of Expenses

8.1 It is the MLT policy to ensure that members of staff are reimbursed promptly and appropriately for expenses incurred on Academy business. However, it should be stressed that it is the responsibility of each staff member to ensure that costs are appropriate, authorised appropriately and reasonable. Any attempt knowingly or falsely to claim expenses in breach of the Financial Regulations will result in disciplinary action. It is the MLT's policy to ensure best use of public monies at all times, taking into account the nature of its business.

8.2 Travel Claims:

Rates payable for Travel are in accordance with HMRC rates and are administered through DCC payroll.

When making a travel claim, an authorised travel claim form will be required plus receipts for expenses claims. For mileage claims a VAT receipt for petrol dated on, or before the date travelled will be required. Reimbursement will be made through payroll.

Staff will only be reimbursed for expenditure that has been authorised prior to undertaking the travel. Reimbursement will be made on production of the authorised purchase requisition and an invoice/till receipt with VAT details.

8.3 Reimbursement of expenses

Expenses will only be reimbursed if they are:

- supported by detailed (VAT) receipts and credit card slips if necessary
- submitted on the Academy Staff Expenses claim form;
- submitted within three (3) months of being incurred unless a justifiable reason is provided;
- fully completed;
- appropriately authorised

9. Debt Management

9.1 The MLT will chase all money due to it, a report will be run monthly to identify outstanding invoices.

The following process will be followed to recover debts:

- first letter sent if invoice remains unpaid after 30 days – a 'friendly reminder'.
- second letter sent if invoice remains unpaid after a further 14 days 'second warning'.
- recovery letter sent if invoice remains unpaid for a further 14 days 'final warning'.
- referred to Finance Committee at next available meeting if invoice still remains unpaid for decision to commence proceedings.

If a debt remains unrecoverable after one year, or, if during the year, it becomes clear that the debt will remain unpaid, authority to write off the debt is as follows:-

- Up to £100 Finance Director

- £101-£500 The Headteacher
- Over £501 The Finance/Audit Committee

9.2 Bad debts are only written off when the MLT has followed all reasonable practical procedures to ensure their recovery. The DFEs prior approval is obtained if debts to be written off are above the value set out at section 3.6.2 of the Academies Financial Handbook.

9.3 The following process will be followed to recover debts associated with school trips.

- the Finance Officer will advise the trip organiser of any debts outstanding after the closing date for final payment. The trip organiser, or their delegate, will attempt to contact the parents via telephone within 7 days to organise payment.
- a letter will be issued by the Finance Officer, or their delegate, if the trip organiser has not managed to contact parents after 7 days.
- a final letter will be issued by the Finance Officer, or their delegate, if payment is not received after 7 days.

10. Assets

10.1 All items purchased with a value over the academy's capitalisation limit of £1,000 must be entered in an asset register. The register will include the following information:

- asset description
- serial number
- date of acquisition
- asset cost
- depreciation (25% over 4 year period)
- location
- name of member of staff responsible for asset

10.2 Equipment with a value of £100 or greater will be included on the equipment register. Equipment that is to be written-off must be recorded and signed by the Headteacher. In line with the Funding Agreement, disposal of fixed assets require prior approval of the Secretary of State.

Activity	Detailed task	Responsibility
Updating Asset Register	Recording of new asset	Finance Officer
Monitoring	Annual monitoring of Asset Register	Audit Committee
Disposal of assets	Disposal of assets with nil or nominal value	Headteacher
	Disposal of assets with market value	LGB

Scheme of Delegations

Authorisation Limits

These limits are taken from the financial regulations that were approved by the Board of Trustees on:

14 April 2016

Expenditure Limits within budget

Site Manager (emergency minor building repairs)	Up to £500
Headteachers & Executive Principal	From £5,001 and £15,000
Business Manager (in absence of Headteacher)	Up to £5,000
Chair of LGB/Trust	Up to £15,001 and £100,000
Trustee Finance Committee	Over £100,000

Cheque Signatories

Two signatures, Finance Director + one Head	Up to £10,000
Executive Principal + one Head or Finance Director	Over £10,000

Virement Limits

Headteacher	Up to £5,000
LGB	From £5,001 to £10,000
Board of Trustees and notify EFA if significant	Over £10,000

Writing off bad debts

Headteacher	Up to £250
Board of Trustees and approval from EFA	Above £250

Above amount in annual funding letter or as per delegated limits section 2.4.10 Academies Financial Handbook 20xx

***Schedule of write offs to Finance and Audit Committees*

Disposal of Surplus Stock, Stores & Assets (estimated value)

Headteacher	Up to £500
Board of Trustees/Finance Committee/LGB	Over £500
Trust Finance Committee	Over £2,000

Board of Trustees plus prior approval of EFA

Freehold land & buildings/heritage assets as per section 2.4.22 Academies Financial Handbook 20xx

***some protection for items bought as a result of fund raising*

Other Monetary Limits

Mileage Allowance	HM Revenue & Customs approved rate
Petty Cash Imprest	£400 (except for an Unusual event)
Safe Cash/ Cheque limits	£3,000 – cash
(as per insurance policy)	£5,000 – cheques (recorded at point of receipt)
	£2,000 monetary instruments i.e. stamps, vouchers

Ordering Procedures

3 Competitive quotations (written evidence required)	£5,000 - £50,000
Tendering procedure	Over £50,000
Tendering procedure + OJEU	€207,000+ (Euros) for supplies and services
Tendering procedure + OJEU	€5,186,000+ (Euros) for works

Asset Register

Capitalisation limit

Over £5,000

Attractive portable items

Over £250

All financial transactions will be monitored and controlled by the Finance Director and Executive Head to ensure that expenditure remains within the approved budgets.

There is an obligation for all budget holders to ensure that expenditure is within agreed priorities and approved budget.

Gifts and Hospitality

As part of the school's commitment to openness and transparency, an annual updated Gifts and Hospitality Register will be maintained by the Business Manager and made available for public inspection. The reporting of gifts and hospitality should be done by using the form below (copies also found in filing cabinet in staffroom), which should be signed by the Headteacher and forwarded to the Finance Director for retention on the Gifts and Hospitality Register.

Any gift or hospitality offered to an employee or member of the LGB, or Trust Board, by a person or body who has or seeks dealings with the Minerva Learning Trust **MUST BE REFUSED**. The exception to this rule, are modest gifts of a promotional character such as diaries and calendars. A gift or form of hospitality may be considered inappropriate where the school or individual would be embarrassed should the proposed action become public knowledge.

Examples of inappropriate gifts:

Cash or cash equivalents of any amount, vouchers or subscriptions, alcohol

Name:

Signature:

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Date:

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Description of Gift Hospitality:

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Estimated Value:£

Name of individual/organization providing gift/hospitality:

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Headteachers signature:

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Date recorded on register:

Signature:

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