

Financial Regulations

Approved by Board of Management: 20 March 2013
Responsibility for Review: Director of Finance and Resources

Also available in large print (16pt)
And electronic format.

Ask Student Services for details.

www.perth.ac.uk

Perth College is a registered Scottish charity, number SC021209



Table of Contents:

		Page
1	General Provisions	3
2	Status of Financial Regulations	4
3	Senior Managers with Day to Day Financial Responsibility	5
4	Financial Planning	6
5	Financial Control	8
6	Accounting Arrangements	9
7	Audit Requirements	11
8	Treasury Management	13
9	Income	14
10	Research Grants and Contracts	17
11	Other Income-Generating Activity	18
12	Intellectual Property Rights and Patents	20
13	Expenditure	21
14	Procurement	22
15	Pay Expenditure	29
16	Assets	33
17	Funds Held on Trust	34
18	Other	35
	APPENDIX 1 – Perth College Procurement Journey	38

1. General Provisions

Perth College is a further education incorporation created under the provisions of the *Further and Higher Education (Scotland) Act 1992*. Its structure of governance is laid down in the instrument and articles of government, which may only be amended by application to the First Minister. Perth College is accountable through its Board of Management, which has ultimate responsibility for the effectiveness of its management and administration.

Perth College is an exempt charity by virtue of the Charities Act 1993.

The *Financial Memorandum between the Scottish Funding Council and Perth College* sets out the terms and conditions on which grant is made. This memorandum was issued by the Scottish Funding Council effective from 1 January 2006. The Board of Management is responsible for ensuring that conditions of grant are met. As part of this process, Perth College must adhere to the Scottish Funding Council's mandatory requirements, which requires it to have sound systems of financial and management control. The financial regulations of Perth College form part of this overall system of accountability. The financial regulations should be read in conjunction with publications and guidelines from the following sources:

- Statement of Recommended Practice (SORP)
- Audit Scotland
- Accounting Standards
- Scottish Parliament Audit Committee
- HE College Administration Schemes
- Scottish Funding Council (SFC)
- Perth College Financial Procedures
- Perth College Board of Management Governance Manual

2. Status of Financial Regulations

- 2.1 This document sets out Perth College's financial regulations. It translates into practical guidance Perth College's broad policies relating to financial control. This document was approved by the Board of Management. It applies to Perth College and all its subsidiary undertakings.
- 2.2 These financial regulations are subordinate to Perth College's instruments and articles of government and to any restrictions contained within Perth College's Financial Memorandum with SFC.
- 2.3 The purpose of these financial regulations is to provide control over the totality of Perth College's resources and provide management with assurances that the resources are being properly applied for the achievement of Perth College's strategic plan and business objectives:
- Financial viability and sustainability.
 - Achieving value for money.
 - Fulfilling its responsibility for the provision of effective financial controls over the use of public funds.
 - Ensuring that Perth College complies with all relevant legislation.
 - Safeguarding the assets of Perth College.
- 2.4 Compliance with the financial regulations is compulsory for all staff connected with Perth College. A member of staff who fails to comply with the financial regulations may be subject to disciplinary action under Perth College's disciplinary policy. The Board of Management will be notified of any such breach through the audit committee. It is the responsibility of Managers to ensure that their staff are made aware of the existence and content of Perth College's financial regulations.
- 2.5 The Finance and General Purposes Committee is responsible for maintaining a continuous review of the financial regulations, through the Director of Finance and Resources, and for advising the Board of Management of any additions or changes necessary.
- 2.6 In exceptional circumstances, the Principal and Chief Executive may authorise a departure from the detailed provisions herein, such departure to be reported to the Board of Management at the earliest opportunity.
- 2.7 Perth College's detailed financial procedures set out how these regulations will be implemented and are contained in a separate manual.

3 Senior Managers with Day to Day Financial Responsibility

3.1 The Director of Finance and Resources

The Director of Finance and Resources is responsible to the Principal for the financial administration of:

- Preparing annual capital and revenue budgets and financial plans.
- Preparing accounts, management information, monitoring and control of expenditure against budgets and all financial operations.
- Preparing Perth College's annual accounts and other financial statements and accounts which Perth College is required to submit to other authorities.
- Ensuring that Perth College maintains satisfactory financial systems.
- Providing professional advice on all matters relating to financial policies and procedures.
- Day-to-day liaison with internal and external auditors in order to achieve efficient processes.

3.2 Members of the Senior and College Management Teams

Members of the Senior and College Management Teams (hereinafter referred to as Managers) are responsible to the Principal for financial management of the areas or activities they control. They are advised by the Assistant Principal and the Director of Finance and Resources in executing their financial duties. The Director of Finance and Resources will supervise and approve the financial systems operating within their departments, including the form in which accounts and financial records are kept. Managers are responsible for establishing and maintaining clear lines of responsibility within their department for all financial matters. Where resources are devolved to budget holders, they are accountable to their Manager for their own budget.

Managers shall provide the Assistant Principal and Director of Finance and Resources with such information as may be required to enable:

- Compilation of Perth College's financial statements.
- Implementation of financial planning.
- Implementation of audit and financial reviews, projects and value for money studies.

3.3 All Members of Staff

All members of staff should be aware and have a general responsibility for the security of Perth College's property, for avoiding loss and for due economy in the use of resources.

They should ensure that they are aware of Perth College's financial authority limits and the values of purchases for which quotations and tenders are required.

They shall make available any relevant records or information to the Director of Finance and Resources or his or her authorised representative in connection with the implementation of Perth College's financial policies, these financial regulations, the system of financial control and the requirements of the Board of Management.

They shall immediately notify the Director of Finance and Resources whenever any matter arises which involves, or is thought to involve, irregularities concerning, inter alia, cash or property of Perth College. The Director of Finance and Resources shall take such steps as he or she considers necessary by way of investigation and report.

4. Financial Planning

4.1 The Director of Finance and Resources is responsible for preparing annually a rolling three-year financial plan for approval by the Board of Management on the recommendation of the Finance and General Purposes Committee and for preparing financial forecasts for submission to SFC. Financial plans should be consistent with the strategic plans and estates strategy approved by the Board of Management.

4.2 Budget Objectives

The Board of Management will, from time to time, propose budget objectives for Perth College. These will help the Director of Finance and Resources in preparing his or her more detailed financial plans for Perth College.

4.3 Resource Allocation

Resources are allocated annually by the Board of Management on the recommendation of the Finance and General Purposes Committee, and on the basis of the above objectives. Managers are responsible for the economic, effective and efficient use of resources allocated to them.

4.4 Budget Preparation

The Director of Finance and Resources is responsible for preparing each year an annual revenue budget and capital programme for consideration by the Finance and General Purposes Committee before submission to the Board of Management. The budget should also include a projected year-end balance sheet and monthly cash flow forecasts if appropriate. The Director of Finance and Resources must ensure that detailed budgets are prepared in order to support the resource allocation process and that these are communicated to Managers as soon as possible following their approval by the Board of Management.

During the year, the Director of Finance and Resources is responsible for submitting any significant/material budget revisions to the Finance and General Purposes Committee for consideration before submission to the Board of Management for approval.

4.5 Capital Expenditure Programmes

The capital expenditure programme includes all expenditure on land, buildings, equipment, furniture and associated costs which are to be capitalised for inclusion in Perth College's financial statements.

The Director of Finance and Resources has responsibility for implementing Protocols for the Inclusion of Capital Projects in the capital expenditure programme for approval of the Principal prior to the start of each financial year and by the Board of Management. These set out the information that is required for each proposed capital project.

The approval of variations, including the notification of large variations to SFC, as laid down in SFC guidelines is the responsibility of the Director of Finance and Resources.

The Director of Finance and Resources is responsible for providing regular statements concerning all capital expenditure to Finance and General Purposes Committee for monitoring purposes.

Following completion of a capital project, a post-project evaluation or final report should be submitted to the Finance and General Purposes Committee and Estates Committee including actual expenditure against budget and reconciling funding arrangements where a variance has occurred as well as other issues affecting completion of the project. Post-project evaluations may also need to be sent to the relevant funding body, as laid down in funding body guidelines.

4.6 Overseas Activity

In planning and undertaking overseas activity, Perth College must have due regard to the relevant guidelines issued by SFC.

4.7 Other Major Developments

Any new aspect of business, or proposed establishment of a company or joint venture, which will require investment in buildings, resources or staff time of more than £50,000 should be presented for approval to the Finance and General Purposes Committee.

The Director of Finance and Resources has responsibility for the Protocols for these Major Developments to enable such proposals to be considered for approval. These set out the information that is required for each proposed development.

5. Financial Control

- 5.1 The control of income and expenditure within an agreed budget is the responsibility of the designated budget holder, who must ensure that day-to-day monitoring is undertaken effectively. Budget holders are responsible to their Manager for the income and expenditure appropriate to their budget.

Significant departures from agreed budgetary targets must be reported immediately to the Director of Finance and Resources by the Manager concerned and, if necessary, corrective action taken.

5.2 Financial Information

The budget holders are assisted in their duties by management information provided by the Director of Finance and Resources.

The Director of Finance and Resources is responsible for supplying budgetary reports on all aspects of Perth College's finances to the Finance and General Purposes Committee on a basis determined by the Finance and General Purposes Committee but subject to any specific requirements of SFC. These reports are presented to the Board of Management, which has overall responsibility for Perth College's finances.

5.3 Changes to the Approved Budget

The Finance and General Purposes Committee will approve any significant/material changes to the previously set budget after consideration of updated financial forecasts.

5.4 Virement

Where a budget holder is responsible for more than one budget, virement is only permitted with the authorisation of the Director of Finance and Resources.

Virement between budgets held by different budget holders is only permitted with the written approval of the transferring budget holder and the Director of Finance and Resources.

5.5 Treatment of Year-end Balances

At the year end, budget holders will not normally have the authority to carry forward a balance on their budget to the following year unless the Director of Finance and Resources has approved a specific scheme for carrying forward all or part of unspent amounts.

6. Accounting Arrangements

6.1 Financial Year

Perth College's financial year will run from 1 August until 31 July the following year.

6.2 Basis of Accounting

The consolidated financial statements are prepared on the historical cost basis of accounting and in accordance with applicable accounting standards.

6.3 Format of the Financial Statements

The financial statements are prepared in accordance with the Statement of Recommended Practice Accounting for Further and Higher Education, subject to any specific requirements of SFC, and in accordance with the provisions of the Companies Act 1985, if that is appropriate.

6.4 Capitalisation and Depreciation

New land and buildings will be recorded in the balance sheet at actual build or acquisition cost, except where they are received as gifts, where they will be recorded at depreciated replacement value. Buildings will be depreciated in equal instalments over their estimated remaining useful life. Freehold land will not be depreciated.

Expenditure incurred on repair, refurbishment or extension of existing buildings will not be capitalised unless it can be demonstrated that the resultant value of the building, on the basis of depreciated replacement value, is greater than the current book value.

Expenditure incurred on the acquisition of assets other than land and buildings may be recorded in the balance sheet where the acquisition cost per item is £1000 or more. Capitalised assets other than land and buildings will be depreciated on a straight line basis over the useful economic life of the asset.

6.5 Accounting Records

The Director of Finance and Resources is responsible for the retention of financial documents. These should be kept in a form that is acceptable to the relevant authorities.

Perth College is required by law to retain prime documents for six years. These include:

- Official purchase orders.
- Purchase invoices.
- Sales Invoices.
- Bank statements.
- Copies of receipts.
- Payroll records, including part-time lecturers' contracts.

The Director of Finance and Resources will make appropriate arrangements for the retention of electronic records.

Members of staff should ensure that retention arrangements comply with any specific requirements of funding organisations such as local enterprise companies.

Additionally, for auditing and other purposes, other financial documents should be retained for three years or as determined by the funder.

6.6 Public Access

The Board of Management is required to supply any person with a copy of Perth College's most recent financial statements. The Board of Management may levy a reasonable fee and this will be charged at the discretion of the Director of Finance and Resources. Copies of latest financial statements are provided to statutory agencies as required and are available on the College website.

6.7 Taxation

The Director of Finance and Resources is responsible for advising Managers on all taxation issues as they apply to Perth College and will provide guidance on compliance with statutory requirements including those concerning VAT, PAYE, national insurance, corporation tax and import duty.

The Director of Finance and Resources is responsible for maintaining Perth College's tax records, making all tax payments, receiving tax credits and submitting tax returns by their due date as appropriate.

7. Audit Requirements

7.1 General

External auditors and internal auditors shall have authority to:

- Access institution premises at reasonable times.
- Access all assets, records, documents and correspondence relating to any financial and other transactions of Perth College.
- Require and receive such explanations as are necessary concerning any matter under examination.
- Require any employee of Perth College to account for cash, stores or any other institution property under his or her control.
- Access records belonging to third parties, such as contractors, when required.

The Director of Finance and Resources is responsible for drawing up a timetable for final accounts purposes and will advise staff and the external auditors accordingly.

Following consideration by the Finance and General Purposes Committee, the financial statements should be reviewed by the audit committee. On the recommendation of the finance and audit committees they will be submitted to the Board of Management for approval.

7.2 External Audit

Under the terms of the Public Finance and Accountability (Scotland) Act 2000, the Auditor General is responsible for the appointment of the external auditors for Perth College.

The primary role of external audit is to report on Perth College's financial statements and to carry out such examination of the statements and

underlying records and control systems as are necessary to reach their opinion on the statements and to report on the appropriate use of funds. The external auditors address their report and opinion jointly to the Auditor General and the members of the Board of Management. Their duties will be in accordance with advice set out in SFC's Code of Audit Practice, Audit Scotland's Code of Audit Practice and the Auditing Practices Board's statements of auditing standards.

7.3 Internal Audit

The internal auditor is appointed by the Board of Management on the recommendation of the audit committee.

Perth College's Financial Memorandum with SFC requires that it has an effective internal audit function. The main responsibility of internal audit is to provide the Board of Management, the Principal and senior management with assurances on the adequacy of the internal control system.

The internal audit service remains independent in its planning and operation but has direct access to the Board of Management, Principal and Chair of the audit committee. The internal auditor will also comply with the Auditing Practices Board's auditing guideline *Guidance for Internal Auditors*.

7.4 Other Auditors

Perth College may, from time to time, be subject to audit or investigation by external bodies such as SFC, National Audit Office, European Court of Auditors, HM Revenue and Customs. They have the same rights of access as external and internal auditors.

7.5 Fraud and Corruption including Bribery

It is the duty of all members of staff, management and the Board of Management to notify the Principal or any member of the Senior Management Team immediately whenever any matter arises which involves, or is thought to involve, irregularity, including fraud, corruption, bribery or any other impropriety.

The notified individual shall immediately invoke the fraud response plan, which is detailed within the College *Fraud Prevention Policy and Response Plan*.

If the suspected fraud, corruption or bribery is thought to involve the Assistant Principal and/or the Principal, the member of staff shall notify the Clerk to the Board of their concerns regarding irregularities.

7.6 Value for Money

It is a requirement of the Financial Memorandum that the Board of Management of Perth College is responsible for delivering value for money from public funds. It should keep under review its arrangements for managing all the resources under its control, taking into account guidance on good practice issued from time to time by SFC, Audit Scotland, the National Audit Office, the Scottish Parliament Audit Committee or other relevant bodies.

Internal audit is to have regard to value for money in its programme of work. This will be used to enable the audit committee to refer to value for money in its annual report.

These requirements are addressed within the *Procurement Policy*.

8. Treasury Management

8.1 Treasury Management Policy

The Finance and General Purposes Committee is responsible for approving the Treasury Management Policy for cash management, long-term investments and borrowings. This will require compliance with SFC rules regarding approval for any secured or unsecured loans that go beyond the general consent levels set out in the Financial Memorandum. The Finance and General Purposes Committee has a responsibility to ensure implementation, monitoring and review of this policy.

All executive decisions concerning borrowing, investment or financing (within policy parameters) shall be delegated to the Director of Finance and Resources and an appropriate reporting system set up. All borrowing shall be undertaken in the name of Perth College or one of its subsidiary companies and shall conform to any relevant SFC requirements.

The Director of Finance and Resources will report to the Finance and General Purposes Committee in each financial year on the activities of the treasury management operation and on the exercise of treasury management powers delegated to him or her.

8.2 Appointment of Bankers and Other Professional Advisers

The Board of Management is responsible for the appointment of Perth College's bankers and other professional financial advisers (such as investment managers) on the recommendation of the Finance and General Purposes Committee. The appointment shall be for a specified period after which consideration shall be given by the Finance and General Purposes Committee to competitively tendering the service.

8.3 Banking Arrangements

The Director of Finance and Resources is responsible, on behalf of the Finance and General Purposes Committee, for liaising with Perth College's bankers in relation to Perth College's bank accounts and the issue of cheques. All cheques shall be ordered on the authority of a designated signatory. Proper arrangements for their safe custody shall be made by the Director of Finance and Resources.

Only the Principal and Chief Executive or the Director of Finance and Resources may open or close a bank account for dealing with Perth College's funds. All bank accounts shall be in the name of Perth College or one of its subsidiary companies.

All cheques drawn on behalf of Perth College must be signed by two authorised persons.

All automated transfers on behalf of Perth College, such as BACS or CHAPS, must be authorised in the appropriate manner and on the basis approved by the Director of Finance and Resources. Details of authorised persons and limits shall be provided for in Perth College's detailed financial procedures.

The Director of Finance and Resources is responsible for ensuring that all bank accounts are subject to regular reconciliation and that large or unusual items are investigated as appropriate.

9. Income

9.1 General

The Director of Finance and Resources is responsible for ensuring that appropriate procedures are in operation to enable Perth College to receive all income to which it is entitled.

Levels of charges for services are reviewed at least annually and significant changes are approved by the Finance and General Purposes Committee.

The Director of Finance and Resources is responsible for ensuring:

- The prompt collection, security and banking of all income received.
- That all grants notified by SFC and other bodies are received and appropriately recorded in Perth College's accounts.
- That all claims for funds, including research grants and contracts, are made by the due date.

9.2 Maximisation of Income

It is the responsibility of all staff to ensure that revenue to Perth College is maximised by the efficient application of agreed procedures for the identification, collection and banking of income. In particular, this requires the prompt notification to the Director of Finance and Resources of sums due so that collection can be initiated.

9.3 Receipt of Cash, Cheques and Other Negotiable Instruments

All monies received within departments from whatever source must be recorded by the department on a daily basis together with the form in which they were received, for example cash, cheques and other negotiable instruments.

All monies received must be passed to the Finance Department promptly as set out in financial procedures. The custody and transit of all monies received must comply with the requirements of Perth College's insurers.

All sums received must be paid in and accounted for in full, and must not be used to meet miscellaneous expenses or be paid into any petty cash float. Personal or other cheques must not be cashed out of money received on behalf of Perth College.

Receipts by credit or debit card: Perth College may receive payments by debit or credit card as detailed in the financial procedures.

9.4 Collection of Debts

It is the responsibility of the Director of Finance and Resources to ensure that:

- Debtors invoices are raised promptly on official invoices, in respect of all income due to Perth College.
- Invoices are prepared with care, recorded in the ledger, show the correct amount due and are credited to the appropriate income account.

- Any credits granted are valid, properly authorised and completely recorded.
- VAT is correctly charged where appropriate, and accounted for.
- Monies received are posted to the correct debtors account.
- Swift and effective action is taken in collecting overdue debts, in accordance with the protocols noted in the financial procedures.
- Outstanding debts are monitored and summary reports prepared for management.

The Director of Finance and Resources is responsible for any changes to arrangements and the periods in which different types of invoice must be paid.

Requests to write off debts in excess of the SFC reporting limit for losses must be referred by the Director of Finance and Resources for submission to the Finance and General Purposes Committee for consideration. Individual debts below this level may be written off with the permission of the Director of Finance and Resources.

9.5 **Student Fees**

The Director of Finance and Resources is responsible for ensuring that appropriate procedures are in operation for collecting tuition and accommodation fees and that all student fees due to Perth College are received.

Any student who has not paid an account for fees or any other item owing to Perth College shall not receive the certificate for any degree awarded by Perth College until all outstanding debts have been cleared. Such students shall be prevented from re-enrolling at Perth College and from using any of Perth College's facilities unless appropriate arrangements have been made.

9.6 **Student Loans**

Appropriate records will be maintained to support all transactions involving student loans.

9.7 **Student Support Funds**

The Assistant Principal is responsible for ensuring that all ring-fenced funding received by Perth College for student support is used in accordance with each scheme's rules and regulations. Under no circumstances should payments be made other than in accordance with the approved scheme.

10. Research Grants and Contracts

10.1 General

The term 'research grant' is restricted to research projects funded by the UK research councils, charities and the higher education funding bodies.

All other externally financed research projects are classified as 'research contracts'.

Where approaches are to be made to outside bodies for support for research projects or where contracts are to be undertaken on behalf of such bodies, it is the responsibility of the Centre Director to ensure that the financial implications have been appraised by the Principal and Chief Executive. This will include obtaining a set of grant terms and conditions from each organisation providing funding to enable appropriate monitoring of compliance.

The Centre Directors are responsible for examining every formal application for grant and shall ensure that there is adequate provision of resources to meet all commitments and should ensure that the full cost of research contracts is established. The research agreement must be in line with Perth College's policy with regard to indirect costs and other expenses and taking account of different procedures for the pricing of research projects depending on the nature of the funding body.

Research grants and contracts shall be accepted on behalf of Perth College by the Principal and Chief Executive.

The Director of Finance and Resources shall maintain all financial records relating to research grants and contracts and the Centre Director shall initiate all claims for reimbursement from sponsoring bodies by the due date.

Each grant or contract will have a senior owner and will be assigned to a specific budget holder.

Control of pay and non-pay expenditure will be contained within the budget centre. The Centre Director may delegate day-to-day control of the account to a budget or grant holder, but any overspend or under-recovery of overheads is to be the clear responsibility of the budget centre with any loss being a charge on departmental funds.

10.2 Recovery of Overheads

Overheads will be charged to research activity whether or not the funding arrangements permit full recovery.

10.3 Costing/Transparency

Perth College has agreed to adopt the principles on costing and pricing recommended by the Executive Board of the University of the Highlands and Islands.

Staff undertaking research activity will maintain the records specified by the Centre Director to enable compilation of returns to the funding body which meet the requirements of the Transparency Review.

10.4 Grant and Contract Conditions

Many grant-awarding bodies and contracting organisations stipulate conditions under which their funding is given. In addition, there are often procedures to be followed regarding the submission of interim or final reports or the provision of other relevant information. Failure to respond to these conditions often means that Perth College will suffer a significant financial penalty. It is the responsibility of the Centre Director to ensure that conditions of funding are met.

Any loss to Perth College resulting from a failure to meet conditions of funding is the responsibility of the budget holder, and will be charged against departmental funds.

11. Other Income-Generating Activity

11.1 Private Consultancies and Other Paid Work

Unless otherwise stated in a member of staff's contract, outside consultancies or other paid work may not be accepted without the agreement of the Director of Human Resources and Communications.

11.2 Non Funded Provision

In this context non funded provision is any course which does not form part of the grant-in-aid funded activities at FE and HE levels.

All non funded provision must be costed and priced in accordance with the College commercial pricing model and be covered by a contract or written agreement with the customer or short course enrolment form (in the case of individuals).

11.3 Commercial Contracts

In this context commercial contracts include training, assessment and consultancy. These contracts are normally originated by the client and signed by the Principal and Chief Executive. In such event that Perth College is required to originate such documents, the Assistant Principal will arrange for these to be drafted.

11.4 Levels of Authorisation

Managers can sign contracts up to the value of £5,000 excluding VAT (for work in their own area of responsibility and provided they have completed a pricing document).

The Principal (or any Senior Manager or Manager with delegated authority from the Principal) can sign contracts over £5,000.

Contracts are required in ALL cases (short form agreements or from clients).

Contracts must be costed and authorised before any commitments are made.

11.5 Off-site Collaborative Provision (Franchising)

Any contract or arrangement whereby Perth College provides education to students away from College premises, or with the assistance of persons other than Perth College's own staff or with independent contractors (partner organisations), must be subject to the following procedure.

There shall be a contract signed by the Principal and on behalf of any partner organisation that shall comply at least with the funding body model contract (as amended from time to time) in place before any provision is made.

Contracts for significant changes in franchising activity shall be approved in advance by the Board of Management.

The impact of the contract(s) shall be subject to scrutiny by the Audit Committee where risk has been assessed as being greater than risk appetite. The format for regular reports shall be as stated in funding body guidance.

Where the partnership would represent a significant departure from Perth College's strategic plan, the Board of Management shall approve the departure, and the Principal shall seek the views of and inform SFC.

11.6 Profitability and Recovery of Overheads (Other Income-Generating Activity)

All other income-generating activities must be self-financing or surplus-generating unless it is intended that a new course is to be launched as a loss leader. If that is the case, the reason for it must be specified and the pricing approved by the Director of Finance and Resources or the Assistant Principal.

Provision must be made for charging both direct and indirect costs in accordance with Perth College's costing and pricing model, in particular for the recovery of overheads.

11.7 Projects including European Union (EU) and Other Grant Funding Activity

Any such project requires the approval of the Senior Management Team prior to any commitment being entered into. Such approval shall be dependent upon the relevant proposer being able to demonstrate that any eligible matching funds are available and that the project is financially viable. The *Procurement Policy* details the requirements of proposals and their implementation. Individual applications for funds in excess of £100,000 shall be the subject of a report by the Principal to the Board of Management which will set out, amongst other things, the potential risks generated by the project.

If Perth College sub-contracts such work to external providers, the relevant Manager shall ensure that:

- This is on the basis of a written contract which allows for full audit access to detailed records.
- Appropriate monitoring procedures are in place to ensure that the outputs are achieved and the provision is of suitable quality.
- Payments are only made against detailed invoices.

12. Intellectual Property Rights and Patents

12.1 General

Certain activities undertaken within Perth College including research and consultancy may give rise to ideas, designs and inventions which may be patentable. These are collectively known as intellectual property.

12.2 Patents

The Principal is responsible for establishing procedures to deal with any patents accruing to Perth College from inventions and discoveries made by staff in the course of their work.

12.3 Intellectual Property Rights

In the event of Perth College deciding to become involved in the commercial exploitation of inventions and research, the matter should then proceed in accordance with intellectual property procedures. These would be developed as required following legal advice and be approved by the Finance and General Purposes Committee.

13. Expenditure

13.1 General

It is the responsibility of the Director of Finance and Resources to ensure that payments are made to suppliers of goods and services to Perth College.

13.2 Scheme of Delegation/Financial Authorisation Limits

The Manager is responsible for purchases within his or her area. Purchasing authority may be delegated to named individuals. In exercising this delegated authority, budget holders and second signatories are required to observe the purchasing policies and financial procedures.

The Director of Finance and Resources shall maintain a register of authorised signatories and Managers must supply him or her with specimen signatures of those authorised to certify invoices for payment (for paper-based systems).

Under procedures agreed by the Director of Finance and Resources, central control shall be exercised over the creation of requisitioners and authorisers and their respective financial limits (for electronic systems).

The Director of Finance and Resources must be notified immediately of any changes to the authorities to commit expenditure.

Managers and budget holders are not authorised to commit Perth College to expenditure without first reserving sufficient funds to meet the purchase cost.

The member of staff (or budget holder) authorising the invoice for payment must be different from the member of staff responsible for signing the

purchase order requisition. To ensure segregation of duties more than one person must be involved in the authorisation of the payment process.

The limits on authority to sign any single order are:

Up to £2,500 exclusive of VAT is the budget holder (£5,000 in the case of IT and estates purchases).

Over £2,500 and up to £10,000 exclusive of VAT is the senior manager of directorate.

Over £10,000 exclusive of VAT is the Principal (Board of Management approval if over £50,000 exclusive of VAT).

Expenditure on a single order in excess of £5,000 exclusive of VAT are subject to the Tendering and Quotation Procedures. (see section 13.5)

The Principal and Chief Executive or the Assistant Principal or the Director of Finance and Resources must authorise departmental orders in the absence of a budget holder and his or her second signatory.

In the event that the Principal and Chief Executive or the Assistant Principal or the Director of Finance and Resources is not available for approval of expenditure, other members of the Senior Management Team may approve relevant orders in their absence.

14 **Procurement**

Perth College requires all budget holders, irrespective of the source of funds, to obtain supplies, equipment and services at the lowest possible cost consistent with quality, delivery requirements and sustainability, and in accordance with sound business practice.

The Director of Finance and Resources is responsible for:

- Ensuring that Perth College's purchasing policy is known and observed by all involved in purchasing for Perth College.
- Advising on matters of college purchasing policy and practice.
- Advising and assisting staff where required on specific departmental purchases.
- Developing appropriate standing supply arrangements on behalf of Perth College to assist budget holders in meeting their value for money obligations.
- Ensuring that all orders are vetted before they leave Perth College.
- Ensuring that accepted conditions of contract for the purchase of goods do not expose the College to unacceptable risk

The Director of Finance and Resources is responsible for procurement and specifically:

- the drafting and negotiation of all large-scale purchase contracts (generally in excess of £50,000) undertaken by Perth College, in collaboration with the budget holder
- ensuring that Perth College complies with EU regulations on public purchasing policy.

14.1 Purchase Orders

The ordering of goods and services shall be in accordance with Perth College's detailed financial procedures/purchasing policies.

Official orders must be placed for the purchase of all goods or services, except those on the exceptions listing (in the financial procedures), those made using college credit cards or petty cash.

It is the responsibility of the Director of Finance and Resources to ensure that all purchase orders refer to Perth College's *General Conditions of Contract for the Supply of Goods*.

14.2 Tenders and Quotations

Managers and delegated budget holders must comply with Perth College's Tendering and Selection of Suppliers procedures.

All intended purchases that may exceed £25,000 must be subject to competitive tendering. For all other purchasing transactions, the following thresholds are applicable.

- Up to £2000 – budget holder has discretion but previous rules re preferred suppliers, consortia and value for money must always be met. 3 informal quotes should be obtained and noted on PECOS.
- £2000-£5000 – budget holder must obtain 3 written quotations. Brief details of quotations must be entered on PECOS. Written quotations to be held by budget holder for audit purposes.
- £5000-£25000 – budget holder must obtain 5 competitive quotations via the Public Contracts Scotland portal.
- £25000 and above - competitive tender through Perth College UHI Procurement Office required.

In all cases figures are ex VAT.

- 2.1 In all cases, the Procurement Journey decision making process (at Appendix 1) should be consulted and adhered to.

- 2.2 When the College uses a buying consortium to undertake competitive tendering the consortia will ensure that the proper regulations are followed, including sourcing of goods and/or services.
- 2.3 The Policy covers Procurement activity at all of the college locations including the main campus and Learning Centres. It applies to all areas of activity – teaching and non-teaching.

All tendering practice shall be in accordance with Perth College's detailed tendering procedures available from the Finance Department.

14.3 **ICT Purchasing**

ICT purchasing will normally occur through the budgets allocated annually to the Information Services and Procurement Director. It is important that all ICT purchasing within the College is reviewed and approved by the Information Services and Procurement Director. This is to ensure a) that all products purchased are compatible with college networks, b) to eliminate possible duplication within the College, c) and to ensure value for money.

For the main ICT purchasing from annual ICT budget allocations, standard purchase procedures are generally unsuitable. Reasons for this include:

'Spot' pricing that requires immediate uptake.

Volume discounts for aggregation of orders.

Compatibility to ensure new equipment will work with existing systems.

Avoidance of maintenance contract 'overlap'.

14.4 **Post-Tender Negotiations**

Post-tender negotiations (ie after receipt of formal tenders but before signing of contracts) with a view to improving price, delivery or other tender terms can be entered into, provided:

- It would not put other tenderers at a disadvantage.
- It would not affect their confidence and trust in Perth College's tendering process.

In each case, a statement of justification should be approved by the Principal prior to the event, showing:

- Background to the procurement
- Reasons for proposing post-tender negotiations
- Demonstration of the improved value for money.

All post-tender negotiations should be reported to the Finance and General Purposes Committee.

14.5 **Major Building Contracts**

Building contracts are the responsibility of the Director of Finance and Resources and should adopt the *Protocols for Proposed Capital Projects and Major Developments* .

Proposals will normally be initiated by the Director of Finance and Resources in respect of planned replacements, general improvement schemes, space planning or in response to requests from departments.

Consultants may be appointed if the project, as determined by the Director of Finance and Resources, is too large or too specialised for estates department resources. Appointments shall be subject to tendering and other procedures where appropriate.

Proposals shall be presented in the form of costings or investment appraisals prepared in conjunction with the Director of Finance and Resources as appropriate for consideration by the Senior Management Team. Investment appraisals should comply with appropriate funding body guidance.

Following consideration by the Senior Management Team, the Finance and General Purposes Committee, and approval by the Board of Management, submissions should be forwarded to SFC where appropriate. If the required agreement is secured from SFC, their procedural rules should be followed. Guidance on best practice should be followed even when SFC approval is not required.

The achievement of value for money will be an objective in the letting of all contracts.

14.6 **EU Regulations**

The Director of Finance and Resources is responsible for ensuring Perth College complies with its legal obligations concerning EU procurement legislation. EU procurement regulations apply to written contracts for all

forms of procurement, purchase or hire (whether or not hire purchase) with a total value exceeding a threshold value.

The Director of Finance and Resources will advise Managers on the thresholds that are currently in operation. A breach of these EU regulations is actionable by a supplier or potential supplier.

It is the responsibility of Managers to ensure that their members of staff comply with EU regulations by notifying the Director of Finance and Resources of any purchase that is likely to exceed the thresholds. This will need to be done well in advance in order to permit advertisements in journals, such as the Official Journal of the European Community (OJEC).

The Director of Finance and Resources is also required to submit to SFC annually details on expenditure which exceeds the threshold. Copies of the relevant documentation falling into this category must be provided by Managers to the Director of Finance and Resources.

14.7 Receipt of Goods

All goods shall be received at designated receipt and distribution points. They shall be checked for quantity and/or weight and inspected for quality and specification. A delivery note shall be obtained from the supplier at the time of delivery and signed by the person receiving the goods.

Delivery notes should be held with any relevant records as required by the Director of Finance and Resources. If the goods are deemed to be unsatisfactory, the delivery note/record shall be marked accordingly and the supplier immediately notified so that they can be collected for return as soon as possible. Where goods are short on delivery, the record should be marked accordingly and the supplier immediately notified.

Wherever practical, persons receiving goods on behalf of Perth College must be independent of those who placed the official order.

14.8 Payment of Invoices

The Director of Finance and Resources is responsible for deciding the most appropriate method of payment for categories of invoice. Payments to UK suppliers will normally be made by computer cheques or BACS transfer each week. In exceptional circumstances the Finance department will prepare cheques manually for urgent payments.

Suppliers should be instructed by the budget holder to submit invoices for goods or services directly to the Finance department. Invoices received

directly by other areas must be passed to the Finance department immediately.

Payments will only be made by the Finance department against invoices that have been certified for payment by the appropriate Manager or budget holder and care must be taken by the budget holder to ensure that discounts receivable are obtained.

Authorisation of an invoice will ensure that:

- The goods have been received, examined and approved with regard to quality and quantity, or that services rendered or work done is satisfactory.
- Where appropriate, it is matched to the order.
- Invoice details (quantity, price discount) are correct.
- The invoice is arithmetically correct.
- The invoice has not previously been passed for payment.
- Where appropriate, an entry has been made on a stores record or departmental inventory.
- An appropriate cost centre is quoted; this must be one of the cost centre codes included in the budget holder's areas of responsibility and must correspond with the types of goods or service described on the invoice.

14.9 Staff Reimbursement

Staff may incur expenses in relation to Perth College business for which they are entitled to reimbursement. These expenses normally relate to travel and subsistence.

Where such expenses by staff are planned, the Director of Finance and Resources may approve a cash advance to staff. Upon completion of the travel or project to which the advance relates, any unspent balance must be repaid within one month and under no circumstances will a second advance be approved until the first balance has been settled.

14.10 College Credit Cards

Where appropriate, the Principal and Chief Executive or the Director of Finance and Resources may approve the issuing of college credit cards to senior staff. Such credit cards shall be used for the payment of valid business expenses only, and the misuse of such cards shall be grounds for disciplinary action. The Director of Finance and Resources will be responsible for setting in place a system to monitor the use of college credit cards and account for expenses charged through them.

14.11 Petty Cash

Where a single item is for less than £50 it may be paid from petty cash. Receipts or vouchers must support all petty cash expenditure. Any request above £50 must be approved by the Director of Finance and Resources.

The Director of Finance and Resources shall make available to areas such imprests as he or she considers necessary for the disbursements of petty cash expenses. However, it is important for security purposes that petty cash imprest floats are kept to a minimum.

Requisitions for reimbursements must be sent to the Finance department, together with appropriate receipts or vouchers, before the total amount held has been expended in order to retain a working balance pending receipt of the amount claimed. Cash floats may be supplemented by written agreement and such increases in cash taken into account at the next balance point.

The member of staff granted a float is personally responsible for its safe-keeping. The petty cash box must be kept locked in a secure place in compliance with the requirements of Perth College's insurers when not in use and will be subject to periodic checks by the Manager or another person nominated by him or her.

Standard college petty cash slips are supplied by the Finance department and should be used for recording all imprest account expenditure.

At the end of the financial year a certificate of the balances held should be completed by the member of staff responsible for the float and counter-signed by the Manager.

14.12 Other Payments

Payments for maintenance and other items to students on behalf of sponsoring organisations shall be made on the authority of the Director of Finance and Resources, supported by detailed claims approved by the Student Services Manager.

14.13 Late Payment Rules

The Late Payment of Debts (Interest) Act 1998 was introduced to give small businesses the right to charge interest on late payments from large organisations and public authorities. Key points are:

- Small businesses can charge interest on overdue invoices.
- Interest is chargeable on sales.

- The Act also applies to overseas organisations.
- Perth College can be sued for non-payment.

In view of the penalties in this Act, the Board of Management requires that invoices must be passed for payment as soon as they are received.

14.15 Project Advances

The Director of Finance and Resources and the relevant Manager may jointly approve cash advances for projects carried out away from Perth College where cash expenditure may be unavoidable. Other forms of payment will be expected to be used wherever possible, such as an official purchase order and subsequent payment or a Perth College credit card.

Receipts or paid invoices will be retained for all sums expended in this way. Upon completion of the project to which the advance relates and within one month a final account must be prepared to demonstrate how the advance was disbursed and any unspent balance repaid. Under no circumstances will a second advance be approved when the final accounting for an earlier advance to a project or individual is outstanding.

14.16 Giving Hospitality

Staff entertaining guests from outside bodies should normally use Perth College's catering facilities. Where this is not the case, reasons may be requested when submitting a claim for reimbursement.

Claims are reviewed by the Finance department to ensure that such expenditure for entertaining guests is acceptable.

15. Pay Expenditure

15.1 Remuneration Policy

Salaries and other benefits of the Principal and the Clerk to the Board of Management will be determined by the Remuneration Committee set up by the Board of Management.

All other staff will be appointed to the salary scales approved by the Principal and in accordance with appropriate conditions of service. All letters of appointment must be issued by the HR department.

The Remuneration Committee or the Principal will determine what other benefits, such as cars, medical and life insurance, are to be available, the

basis of their provision (contributory or not) and the staff to whom they are to be available.

15.2 **Appointment of Staff**

All contracts of service shall be concluded in accordance with Perth College's approved HR practices and procedures and all offers of employment with Perth College shall be made in writing on the authority of the Director of Human Resources and Communications. Budget holders shall ensure that the HR Department is provided promptly with all information they may require in connection with the appointment, resignation or dismissal of employees.

15.3 **Salaries and Wages**

The Director of Finance and Resources is responsible for all payments of salaries and wages to all staff including payments for overtime or services rendered. All timesheets and other pay documents, including those relating to fees payable to external examiners, visiting lecturers or researchers, will be in a form prescribed or approved by the Director of Human Resources and Communications.

The Director of Human Resources and Communications will be responsible for keeping the Director of Finance and Resources informed of all matters relating to staff for payroll purposes. In particular these include:

- Appointments, resignations, dismissals, supervisions, secondments and transfers.
- Absences from duty for sickness or other reason, apart from approved leave.
- Changes in remuneration other than normal increments and pay awards.
- Information necessary to maintain records of service for superannuation, income tax and national insurance.
- Cost centre code to which the salaries are to be charged for new members of staff.

The Director of Finance and Resources is responsible for payments to non-employees and for informing the appropriate authorities of such payments. All casual and part-time employees will be included on the payroll.

The Director of Finance and Resources shall be responsible for keeping all records relating to payroll including those of a statutory nature.

All payments must be made in accordance with Perth College's detailed payroll financial procedures and comply with HM Revenue and Customs regulations.

15.4 Superannuation Schemes

The Board of Management is responsible for undertaking the role of employer in relation to appropriate pension arrangements for employees.

The Director of Finance and Resources is responsible for day-to-day superannuation matters, including:

- Paying contributions to various authorised superannuation schemes.
- Preparing the annual return to various superannuation schemes.
- Administering relevant pension schemes.

The Director of Human Resources and Communications is responsible for administering eligibility to pension arrangements and for informing the Payroll Officer when deductions should begin or cease for staff.

15.5 Travel, Subsistence and other Allowances

All claims for payment of subsistence allowances, travelling and incidental expenses shall be completed in a form approved by the Director of Finance and Resources.

Claims by members of staff must be authorised by their Manager (or Principal in the case of Senior Managers). The certification by the Manager shall be taken to mean that:

- The journeys were authorised.
- The expenses were properly and necessarily incurred.
- The allowances are properly payable by Perth College.
- Consideration has been given to value for money in choosing the mode of transport.

Arrangements for travel by the Principal or members of the Board of Management shall be approved by the Chair of the Board of Management. Arrangements for travel by the Chair shall be approved by the Finance and General Purposes Committee.

15.6 Overseas Travel

All arrangements for overseas travel must be approved on the approved documentation by the Principal and Chief Executive in advance of

committing Perth College to those arrangements or confirmation of any travel bookings. Arrangements for overseas travel by the Principal and Chief Executive or members of the Board of Management shall be approved by the Chair of the Board of Management. Arrangements for travel by the Chair shall be approved by the Finance and General Purposes Committee.

Where spouses, partners or other persons unconnected with Perth College intend to participate in a trip, this must be clearly identified in the approval request. Perth College must receive reimbursement for the expected costs it may be asked to cover for those persons in advance of confirming travel bookings.

15.7 Severance and Other Non-Recurring Payments

Severance payments shall only be made in accordance with relevant legislation and under a scheme approved by the Board of Management through the Finance and General Purposes Committee. Professional advice should be obtained where necessary. No amounts shall be expended that exceed the budget allocated for the purpose. All such payments shall be authorised by the Principal and Chief Executive and calculations checked by the Director of Human Resources and Communications. Where enhancements to the approved scheme are to be offered, approval by either the Remuneration Committee or the Chairs Committee is required. In exceptional circumstances this approval may be given by the Chair of Board of Management in consultation with the Principal, to be reported to the next meeting of the relevant committee. Amounts paid should be declared in the financial statements.

All matters referred to an industrial tribunal shall be notified to the Finance and General Purposes Committee at the earliest opportunity. All determinations of tribunals must be similarly notified.

15.8 Leasing

The lease agreements for buildings must be approved and signed by the Director of Finance and Resources. Equipment may be acquired under an operating lease or a finance lease. Operating leases must be signed by the Director of Finance and Resources. All lease agreements will be kept in the Finance Office and monitored by the Director of Finance and Resources in relation to expiry and renewal.

15.9 Expenses for members of the Board of Management

Claims for members of the Board of Management will be approved by the Clerk to the Board as budget holder.

16. Assets

15.1 Land, Buildings, Fixed Plant and Machinery

The purchase, lease or rent of land, buildings or fixed plant can only be undertaken with authority from the Director of Finance and Resources and Director of Finance and Resources and if over £50,000 in value from the Board of Management. Reference to SFC requirements will be made at all times where exchequer-funded assets or exchequer funds are involved.

16.2 Fixed Asset Register

The Director of Finance and Resources is responsible for maintaining Perth College's register of land, buildings, fixed plant and machinery. Managers will provide the Director of Finance and Resources with any information he or she may need to maintain the register.

16.3 ICT Inventories

The Information Services and Procurement Director is responsible for maintaining an inventory, in a form prescribed by the Director of Finance and Resources, for all College ICT equipment. Inventories must be checked at least annually to ensure that the records are accurate and up to date.

16.4 Stocks and Stores

Managers are responsible for establishing adequate arrangements for the custody and control of stocks and stores within their departments. The systems used for stores accounting in departments must have the approval of the Director of Finance and Resources.

Managers are responsible for ensuring that regular inspections and stock checks are carried out. Stocks and stores of a hazardous nature should be subject to appropriate security checks.

Those Managers whose stocks require valuation in the balance sheet must ensure that the stock-taking procedures in place have the approval of the Director of Finance and Resources and that instructions to appropriate staff within their departments are issued.

16.5 Safeguarding Assets

Managers are responsible for the care, custody and security of the buildings, stock, stores, furniture, cash, etc under their control. They will consult the Director of Finance and Resources in any case where security

is thought to be defective or where it is considered that special security arrangements may be needed.

Assets owned by Perth College shall, so far as is practical, be effectively marked to identify them as College property.

16.6 Personal Use

Assets owned or leased by Perth College shall not be subject to personal use without proper authorisation.

16.7 Asset Disposal

Disposal of plant, equipment and furniture may only take place with the prior authorization of the Director of Finance and Resources and must be in accordance with procedures contained in Perth College's detailed financial procedures.

Disposal of land and buildings must only take place with the authorisation of the Board of Management. SFC consent may also be required if exchequer funds were involved in the acquisition of the asset.

16.8 All other Assets

Managers are responsible for establishing adequate arrangements for the custody and control of all other assets owned by Perth College, whether tangible (such as stock – see 21.4) or intangible (such as intellectual property – see 18.3), including electronic data.

17. Funds Held on Trust

17.1 Gifts, Benefactions and Donations

The Director of Finance and Resources is responsible for maintaining financial records in respect of gifts, benefactions and donations made to Perth College.

17.2 Student Support Funds

Records of student support funds will be maintained according to SFC and SAAS requirements.

17.3 Trust Funds

The Director of Finance and Resources is responsible for maintaining a record of the requirements for each trust fund and for advising the Finance and General Purposes Committee on the control of the expenditure of such funds donated to the College.

The Finance and General Purposes Committee is responsible for ensuring that trust funds within the control of Perth College are operated within any relevant legislation and the specific requirements for each trust. They will also be responsible for investment of fund balances.

17.4 Voluntary Funds

The Director of Finance and Resources shall be informed of any fund that is not an official fund of Perth College which is controlled wholly or in part by a member of staff in relation to their function in Perth College.

18. Other

18.1 Insurance

The Director of Finance and Resources is responsible for Perth College's insurance arrangements, including the provision of advice on the types of cover available. As part of the overall risk management strategy, all risks will have been considered and those most effectively dealt with by insurance cover will have been identified. This is likely to include important potential liabilities and provide sufficient cover to meet any potential risk to all assets. This portfolio of insurances will be considered and approved by the Finance and General Purposes Committee on an annual basis.

The Director of Finance and Resources is responsible for effecting insurance cover as determined by the Senior Management Team and the Finance and General Purposes Committee. He or she is therefore responsible for obtaining quotes, negotiating claims and maintaining the necessary records. The Director of Finance and Resources will ensure that a register of all insurances effected by Perth College is kept and the property and risks covered. He or she will also deal with Perth College's insurers and advisers about specific insurance problems.

Managers must ensure that any agreements negotiated within their departments with external bodies cover any legal liabilities to which Perth College may be exposed. The Director of Resource's advice should be sought to ensure that this is the case.

Managers must give prompt notification to the Director of Finance and Resources of any potential new risks and additional property and equipment that may require insurance and of any alterations affecting existing risks. Managers must advise the Director of Finance and Resources immediately of any event that may give rise to an insurance claim. The Director of Finance and Resources will ensure that Perth College's insurers are notified and, if appropriate, a claim prepared in conjunction with the Manager for transmission to the insurers.

The Director of Finance and Resources is responsible for ensuring suitable records of plant are kept which can be inspected by an insurance company and for ensuring that any inspection is carried out in the periods prescribed.

All staff using their own vehicles on behalf of Perth College shall ensure appropriate insurance cover for business use.

18.2 Companies and Joint Ventures

In certain circumstances it may be advantageous to Perth College to establish a company or a joint venture to undertake services on behalf of Perth College.

Having due regard to guidance issued by SFC, it is the responsibility of the Board of Management to establish the shareholding arrangements and appoint directors of companies wholly or partly owned by Perth College. These and other arrangements will be set out in appropriate legal documentation.

The directors of companies where Perth College is the majority shareholder must provide quarterly management accounts to the College's Finance and General Purposes Committee and minutes of Board meetings for submission to the College Board of Management. The College will ensure that appropriate external auditors are appointed to such companies.

Where Perth College is the majority shareholder in a company, SFC requires that the company's financial year must be consistent with that of Perth College.

18.3 Security

Keys to safes or other similar containers are to be carried on the person of those responsible at all times. The loss of such keys must be reported to the Director of Finance and Resources immediately.

The Information Services and Procurement Director shall be responsible for maintaining proper security and privacy of information held on Perth College's computer network. Appropriate levels of security will be provided, such as passwords for networked PCs together with restricted physical access for network servers. Information relating to individuals held on computer will be subject to the provisions of the Data Protection Act 1998. A Data Controller shall be nominated to ensure compliance with the Act and the safety of documents.

The Principal is responsible for the safekeeping of official and legal documents relating to Perth College. Signed copies of deeds, leases, agreements and contracts must, therefore, be forwarded to the PA to the Principal. All such documents shall be held in an appropriately secure, fireproof location and copies held at a separate location.

18.4 Students' Association

The Students' Association is a constituent part of Perth College and, as such, is responsible to the Board of Management.

Subject to any constraints imposed by SFC, the Board of Management shall determine the level of grant to be paid annually to the Students' Association and approve their budget for the year.

The Students' Association will have its own bank account and financial records.

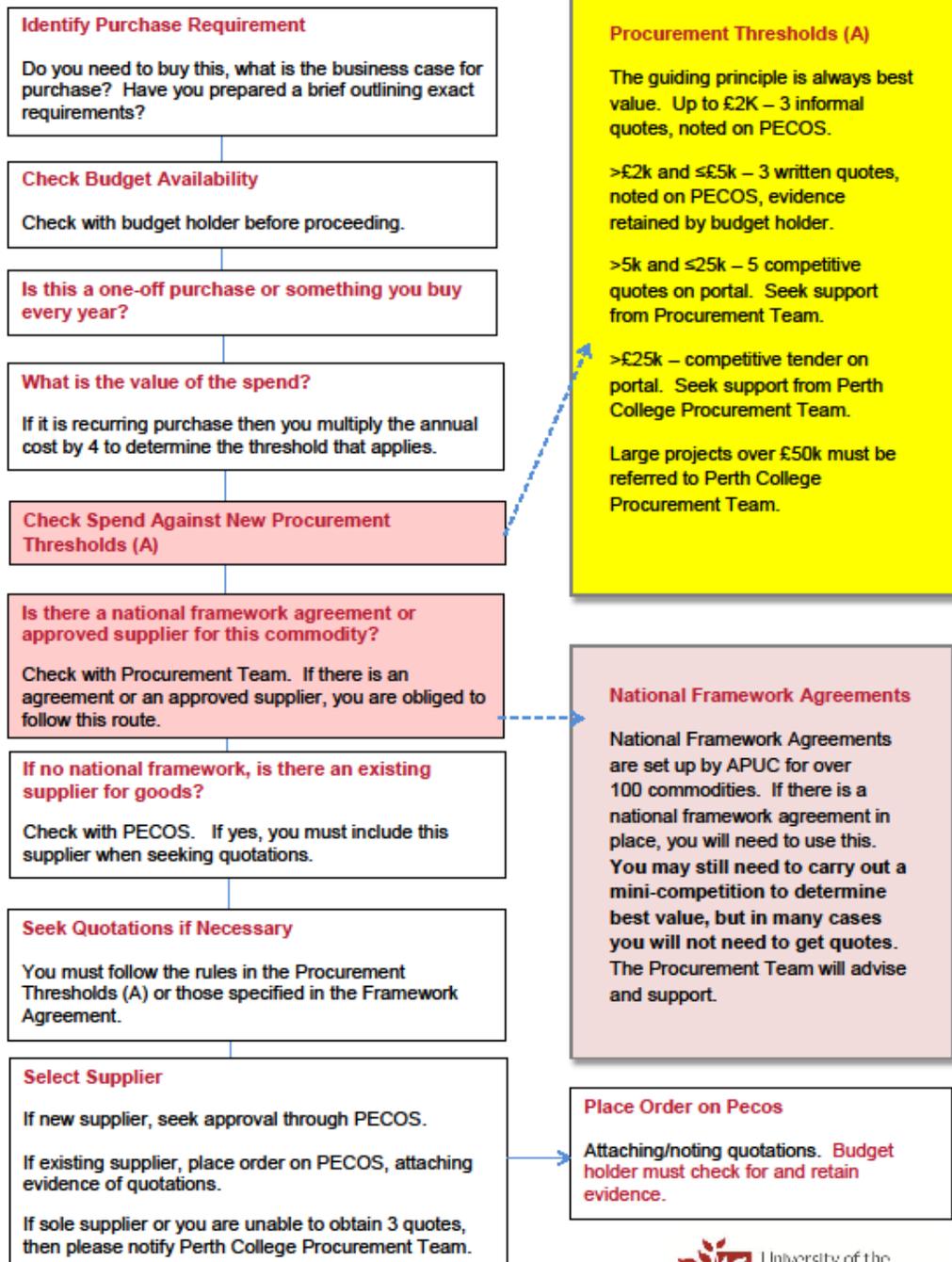
The Students' Association will provide quarterly statements of income and expenditure to the Customer Services Manager and the Director of Finance and Resources on a prompt basis to enable them to ensure that financial disciplines are maintained.

18.5 Provision of Indemnities

Any member of staff asked to give an indemnity, for whatever purpose, should consult the Director of Finance and Resources before any such indemnity is given.

APPENDIX 1

Perth College Procurement Journey



PR/015/RMEF

