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Policy Name	Financial Regulations
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West Whitlawburn Housing Co-operative will provide this policy on request at no cost, in larger print, in Braille, in audio or other non-written format, and in a variety of languages. Please contact the office.

References to specific policies and procedures are underlined.

Table of Contents

1. Introduction	3
2. Internal Financial Control.....	3
3. Role of Management Committee	5
4. The Director and Depute Director	6
5. The Staff.....	6
6. The Assistant Director (Corporate Services).....	7
7. Budget Preparation.....	8
8. Budgetary Control.....	9
9. Accounting	9
10. Fraud, Bribery and Errors.....	10
11. External Audit.....	11
12. Banking.....	11
13. Development Contract Finance.....	12
14. Property Register	12
15. Asset and Fixed Asset Register	12
16. Protection of Personal Property.....	13
17. Income.....	13
18. Irrecoverable Income	14
19. Insurances.....	15
20. Treasury Management.....	15
21. Purchase Orders.....	15
22. Expenditure	16
23. Travelling, Subsistence and Expenses	16
24. Gifts, Hospitality and Interests.....	17
25. Internal Audit.....	17
26. Books, Registers and Computer Data.....	17
27. Security	17
28. Grants for Development Works	19
Related Documents.....	20

1. Introduction

- 1.1. West Whitlawburn Housing Co-operative is a community owned and controlled, non-profit making Housing Co-operative and operates under Fully Mutual and Charitable Co-operative Model Rules based upon the SFHA Charitable Model Rules (Scotland) 2013. It is a Registered Social Landlord registered with the Scottish Housing Regulator and the Financial Conduct Authority. It is also a Scottish Charity, registered with the Office of the Scottish Charity Regulator.
- 1.2. The Co-operative must demonstrate effective governance and sound financial management and must have a robust policy and procedural framework that complies with legislation, guidance and good practice.
- 1.3. The Standing Orders of the organisation detail how the organisation will be controlled and run and include responsibilities, powers and remits of each committee or sub-committee.
- 1.4. These Financial Regulations describe committee's and staff's responsibilities together with details of generally accepted best practice. They form a part of the overall system of financial and management control and take account of the Scottish Housing Regulator's (SHR) Standards of Governance and Financial Management.
- 1.5. The Management Committee is responsible for approval and amendment of Standing Orders and these Financial Regulations.
- 1.6. The financial procedures set out how these regulations shall be implemented.
- 1.7. Compliance with the financial regulations is compulsory for all staff and governing body members. It is the responsibility of section heads to ensure that all staff are aware of the existence and content of these regulations.

2. Internal Financial Control

- 2.1. Internal financial control is defined as the controls established to:
 - a) provide reasonable assurance of the safeguarding of assets against unauthorised use or disposition; and
 - b) provide reasonable assurance of the maintenance of proper accounting records and the reliability of financial information used in and published by the Co-operative.

2.2. Requirement for Internal Financial Control

It is a requirement of Regulatory Advice Note: Internal Financial Controls and the Regulatory Standards (Sept 14) for Registered Social Landlords that we include a statement in our published accounts which:

- a) Confirms that Committee acknowledges its responsibility for internal financial control.
- b) Includes a description of the key procedures for internal financial control.
- c) Confirms that Committee has, in each financial year, reviewed the effectiveness of the system of internal financial control and reports whether any weaknesses in the system of internal financial control has resulted in any material losses, contingencies or uncertainties which require disclosure in the audited accounts.
- d) Explains that the system cannot provide absolute assurance against material loss or misstatement.
- e) Provides reason for any non-compliance.

2.3. The External Auditors are required to review this statement and to report any discrepancies between it and the results of the audit work.

2.4. Responsibility for Internal Financial Control

Responsibility for Internal Financial Control lies with our Management Committee in accordance with the Regulatory Standards. The Committee is responsible therefore for ensuring that the control system defined above is in place, is adhered to and is effective. All committee members and staff must adhere to the controls which apply to any situation involving the Co-operative. Day-to-day management and implementation of controls is delegated to The Director.

2.5. Key Controls

The Co-operative will maintain the following key controls:

- a) Management Accounts will be prepared quarterly for management use and presented to the Finance Sub Committee with a full report and supporting narrative.
- b) The Bank Covenants Report relating to each set of Management Accounts will be approved firstly by the Finance

Sub Committee then submitted to Management Committee for approval.

- c) The Co-operative will prepare annually its Report and Financial Statements and arrange for an external audit to be conducted. An External Auditor's Management Letter will be presented to the Finance Sub Committee at the same time.
- d) A budget for each financial year will be prepared then discussed and approved by Management Committee before each financial year commences.
- e) Every effort will be made to ensure segregation of duties is maintained between initiating, actioning, and recording all financial transactions.
- f) All borrowing decisions and changes to banking arrangements will be approved by Management Committee before being actioned.
- g) All bank transactions will be in accordance with delegated authority levels set out in our Standing Orders.

3. Role of Management Committee

- 3.1. The Management Committee has ultimate responsibility for all aspects of the Co-operative's affairs.
- 3.2. Statute requires the Management Committee to prepare financial statements for each financial year and it is the Management Committee which is responsible for keeping proper accounting records which disclose with reasonable accuracy at any time the financial position of the Co-operative.
- 3.3. The Management Committee is responsible for safeguarding the assets of the organisation and for taking reasonable steps to prevent and detect fraud and other irregularities.
- 3.4. Management Committee members have a duty towards the Co-operative, its staff, tenants and the community and must therefore take steps to satisfy themselves that they receive all necessary information to allow reasoned and justifiable bases for decision making.
- 3.5. The Management Committee has a series of Sub Committees with delegated authority to cover particular areas of the Co-operative's activities. The policy on Standing Orders applies.
- 3.6. Management Committee members should refuse all material gifts and entertainment offered by an individual or company. The Co-operative's policy on Entitlements, Payments and Benefits applies.

4. The Director and Depute Director

- 4.1. The Director and Depute Director shall co-ordinate the activities of the other officers and report back to the Management Committee as required.

5. The Staff

- 5.1. Although the Management Committee is ultimately responsible for the regulation and control of finance, this is partly exercised through staff members. The Director and Depute Director, as senior officers, co-ordinate the activities of other officers and staff and are responsible to the Committee for:
- a) day to day running of the Co-operative
 - b) the implementation of established policy
 - c) recommending courses of action within established policies
 - d) undertaking agreed courses of action
 - e) the preparation and submission of policy recommendations and proposals (or where appropriate, policy development may be delegated to the senior staff member responsible for the function directly affected by the policy formulation).

The Director is personally responsible to the Management Committee and is also answerable for the performance of all other staff members.

- 5.2. The Director, Depute Director and Senior Staff Team are responsible for advising on strategy, policy and ensuring implementation of decisions made by the Management Committee and Sub-Committees. Senior staff are responsible for the accountability and control of the staff and the security, custody and control of all other resources, including equipment, assets and cash within their area of activity.
- 5.3. Issues relevant to the activities of the Co-operative that may influence future policies, or the interpretation and implementation of existing policies, should be discussed by the Senior Staff Team prior to submission to the Management Committee (or relevant Sub-Committee). Staff are obliged to declare an interest in any issue being considered if a decision made could materially affect their personal or business circumstances.
- 5.4. The Director, Depute Director and other staff shall consult with the Assistant Director (Corporate Services) on any matter within his/her responsibility which is liable to materially affect the finances of the

Co-operative before it is then reported to the Management Committee.

- 5.5. All members of staff shall be issued with job descriptions and be provided with documents containing the regulations and procedures that relate to their area of work.
- 5.6. Staff members should refuse all material gifts and entertainment offered by an individual or company in line with the Co-operative's policy on Entitlements, Payments and Benefits.

6. The Assistant Director (Corporate Services)

- 6.1. The Assistant Director (Corporate Services) is responsible to The Director/Depute Director for the administration and control of the finances of the Co-operative. Responsibilities include:
 - a) assisting in long term planning;
 - b) assisting in the preparation of the annual business plan;
 - c) assisting in the production of financial information for the annual report;
 - d) assisting in rent setting;
 - e) co-ordinating input into the preparation of the annual budget
 - f) presenting financial information to the Finance Sub Committee on a quarterly basis (and Management Committee when required);
 - g) preparing the annual accounts, liaising with the Co-operative's auditors in respect of the year end audit, and producing financial information for presentation at the Annual General Meeting;
 - h) ensuring the requirements of Co-operative and Community Benefit Societies Act 2014 or other constituting authorities are obeyed concerning the requirements for the Co-operative to keep proper books and record;
 - i) monitoring the day to day running of the Co-operative's finances;
 - j) maintaining efficient systems of financial control and reporting;
 - k) safeguarding the assets of the Co-operative;
 - l) ensuring the Co-operative has adequate insurance policies in respect of buildings, office equipment, and public liability;
 - m) in conjunction with The Director, Depute Director and the Assistant Director (Property Services), ensuring that all development projects have the required level of funding at the time it is required and that all eligible grants for such projects have been claimed and adequate loan finance has been arranged;

- n) implementing and operating the Treasury Management of the Co-operative with regard to the loan portfolio and with regard to the investment of surplus funds to the benefit of the Co-operative but with the minimum of risk and without contravening statutory restrictions and the Co-operative's Rules;
- o) the production of any other financial information as deemed necessary by the Director or Depute Director.

7. Budget Preparation

- 7.1. The budget is prepared in a form agreed by the Finance Sub Committee. It is in line with the objectives of the Co-operative and will form part of the rent setting process.
- 7.2. Revenue operations and the capital programme must be treated separately.
- 7.3. Preparation will commence five or six months prior to the financial year end with input by the head of each section. This process will run concurrently with the rent setting process.
- 7.4. The final draft budget will normally be approved by the Management Committee in January of each financial year to allow sufficient time for a period of tenant consultation to take place as per the Tenant Participation Policy. This will allow for the most up to date information on interest rates, staff salary increase positions, welfare benefit reform impact etc., with the final budget being approved February or March of each financial year.
- 7.5. Once approved, the budget is to be used as the basis for authority to incur expenditure and for comparison with actual monthly/quarterly results. It should be recognised that changes in circumstances may result in changes to budgeted expenditure. Such changes must be approved by the Management Committee.
- 7.6. The Management Committee and Sub Committees will have delegated spend powers as set out in the Co-operative's Policy on Standing Orders.
- 7.7. The Co-operative will prepare and submit Five Year Financial Projections to the Scottish Housing Regulator in the prescribed format and within the relevant timescales all in accordance with existing guidance from Scottish Housing Regulator. A copy of this information shall be submitted to lenders and external auditors.

8. Budgetary Control

- 8.1. Variations in actual income and expenditure against budget are to be reported to the Finance Sub Committee on a quarterly basis
- 8.2. The Finance Sub Committee will agree expenditure recommendations for non-budgetary or budget overspend in line with the Co-operative's Standing Orders or recommend action to the Full Management Committee on expenditure items over the delegated spend limit.
- 8.3. Nothing in these financial regulations shall prevent an identified officer from incurring expenditure which is essential to meet any immediate needs created by an emergency, subject to such action being reported forthwith to the Management Committee.
- 8.4. The Assistant Director (Corporate Services) will keep the Finance Sub Committee informed on a quarterly basis as to the state of the Co-operative's finances and shall report on the statutory accounts of each financial year within five months of the financial year end and provide The Scottish Housing Regulator with audited year end accounts within six months of the year end.
- 8.5. Where an identified officer proposes a new policy, or variation of existing policy, that has not already been dealt with in the business plan and budget, then that officer will submit a report on the subject matter to their relevant Sub Committee or Management Committee outlining possible effects that the proposition will have on the Co-operative's finances.
- 8.6. The Assistant Director (Corporate Services) will have authority to recommend to the Finance Sub Committee virement (transfer of items from one budget to another) in budgets if required following review of budgeted expenditure. The Finance Sub Committee shall have authority to approve such virement.

9. Accounting

- 9.1. All accounting procedures and records of the Co-operative shall be determined by the Assistant Director (Corporate Services) in accordance with requirements of statutory agencies and authorities. These procedures must take account of statute, good practice and current guidance.
- 9.2. The Assistant Director (Corporate Services) will provide guidance on the accounting principles and procedures to be used by the staff of the Co-operative in all financial matters.
- 9.3. The allocation of accounting duties should where possible take account of segregation of duties

- 9.4. The following books\records shall be kept
- a) Petty Cash Book
 - b) Phil Welsh Welfare Fund Cash Book
 - c) Cash Book (computerised)
 - d) Nominal ledger (computerised)
 - e) Income Received by Mail Book (computerised)
 - f) Postage Book (computerised)
 - g) Rent Accounts (computerised)
 - h) Property Register (computerised)
 - i) Payroll Records
 - j) Fixed Asset Register
 - k) Asset Register and Office Inventory (to be established).
- 9.5. The Co-operative shall prepare and submit the following documents to The Scottish Housing Regulator within the designated timescales as per the guidance:
- a) Loan Portfolio Return
 - b) Annual Financial Statements
 - c) Auditor's Management Letter and Management Committee's response
 - d) Five Year Financial Projections
- 9.6. The Co-operative shall submit Annual Financial Accounts to undernoted on an annual basis and in line with required timescales for submission i.e.

Organisation	Timescale
The Housing Regulator	Within 6 months of the financial year end
The Royal Bank	Within 6 months of the financial year end
Financial Conduct Authority	Within 7 months of the financial year end
OSCR	Within 9 months of the financial year end
The Co-Operative Bank	Within 9 months of the financial year end

10. Fraud, Bribery and Errors

- 10.1. The primary responsibility for the prevention and detection of fraud and errors rest with the Management Committee. Directors and the Senior Staff team have a responsibility to ensure that all internal procedures are such that the likelihood of fraud is minimised

through robust controls and procedures and regular monitoring of these controls.

- 10.2. The external auditor may plan their audit in order to have a reasonable expectation of detecting material misstatements in the financial statements, whether caused by fraud or errors.
- 10.3. Any matters arising which involve irregularities concerning cash, property or the operations of the Co-operative shall be investigated thoroughly by one or more of the Senior Staff Team, auditors, or other external assistance. The involvement of the Police shall be decided upon by the Director/Depute Director in conjunction with the Chairperson.
- 10.4. The Co-operative will maintain a Fraud Register which will record all incidents of actual or attempted fraud or bribery. This register will be open at all times to the Scottish Housing Regulator, External and Internal Auditors.
- 10.5. The Director/Depute Director or Chairperson will report any issue involving irregularities in the Co-operative's activities to the Management Committee and to the Scottish Housing Regulator, Financial Conduct Association, and any lender if required to do so under covenant, as a notifiable event.
- 10.6. The Co-operative will monitor the receipt and banking of all other miscellaneous income in line with the Co-operative's general policies and procedures on monitoring income as set out previously in these Regulations.

11. External Audit

- 11.1. The Co-operative shall conduct its external audit functions in line with its External Audit Policy.

12. Banking

- 12.1. The Assistant Director (Corporate Services) is responsible for:
 - a) the setting up and control of all bank accounts;
 - b) the stock of cheques and relevant stationery;
 - c) the investment of all temporary cash surpluses accruing to the Co-operative;
 - d) keeping petty cash floats for the payment of incidental expenses;
- 12.2. Cheque and BACS payments made by the Co-operative must be made in line with the Co-operative's Procedures for Cheque Signing.
- 12.3. Bank accounts held by the Co-operative are:

Rent Account and associated Special Interest Bearing Account	For day to day income and expenditure
Business Reserve Account	For reserves.
Share Account	For share receipts.
Investment Account	For private finance arrangements
Co-operative Current Account	Private finance account
Phil Welsh Welfare Fund	For fund raising activities.

It is noted that the Investment Account was withdrawn by the Co-operative Bank in November 2017. Alternative arrangements are being investigated on how best to invest the sum held in this account.

- 12.4. Reconciliations between day to day bank accounts and cash books must be carried out each day as and when the bank statements are received.

All other bank accounts must be reconciled on a monthly basis as and when statements are received.

- 12.5. Petty Cash floats and the administration thereof are as specified in the Co-operative's procedures on Administration of Petty Cash System.

13. Development Contract Finance

- 13.1. The payment of contract related invoices and the monitoring of contract income and expenditure are as laid down in the Co-operative's Contract Management Policy.

14. Property Register

- 14.1. All properties are recorded within the Co-operative's property management system (OPENHousing).

15. Asset and Fixed Asset Register

- 15.1. A fixed asset register and inventory is maintained recording a description of furniture, fittings, equipment, and other capital equipment owned or leased by the Co-operative. The form in which the fixed asset register shall be kept shall be set by the Assistant Director (Corporate Services).
- 15.2. The assets of the Co-operative will not be removed other than in the ordinary course of the Co-operative's business, or used other than

for the Co-operative's purposes except in accordance with specific directions of the senior staff member responsible for the property.

- 15.3. Staff responsible for individual assets shall ensure that the property and equipment is maintained in good working order.
- 15.4. Loss or damage to any individual asset coming to the attention of any member of staff shall be reported immediately to the Assistant Director (Corporate Services) and, where appropriate, consideration should be given to an insurance claim following the provisions in section 17 (Insurances) of these regulations.
- 15.5. The depreciation policy for fixed and other assets will be defined by the Assistant Director (Corporate Services) in consultation with the external auditors, and will not be contrary to any general accepted accounting principles.

16. Protection of Personal Property

- 16.1. All staff should ensure that their personal belongings are kept safe at all times as the Co-operative cannot be held responsible for losses.

17. Income

- 17.1. The Co-operative acknowledges the need to maximise income collection.
- 17.2. Where external funding for projects is made available to the Co-operative, all grant claims will be submitted timeously in order to ensure receipt of funds prior to payment or as soon as possible (in line with grant offer conditions) after payment has been made.
- 17.3. The monitoring of all money due to the Co-operative shall be under the supervision of the Assistant Director (Corporate Services).
- 17.4. All staff will give the Assistant Director (Corporate Services) information in connection with work done, goods supplied, or services rendered and of all other amounts due as may be required by them to record correctly all sums due to the Co-operative.
- 17.5. All money received by staff on behalf of the Co-operative will be recorded in accordance with the Co-operative's Procedures for the Receipt of Income.
- 17.6. No income due will be written off as a bad debt without the authorisation of the Management Committee.
- 17.7. The Co-operative's main source of income is from rents. No cash payments (except in very exceptional circumstances and following approval by the Assistant Director (Tenancy Services)) will be

accepted within the office. The Co-operative's policy on Rent Collection and Accounting sets out the procedures for the receipt of rent payments using the Allpay rent collection system.

- 17.8. The Co-operative will from time to time recoup repair charges from tenants. An arrangement may be put in place for small instalments of cash to be paid at the office if this is seen as the only reasonable way of recouping such payments.
- 17.9. The Co-operative, in promoting to its tenants the availability of a Tenants Contents Insurance Scheme, will not accept premium payments from tenants in this regard – tenants are required to make payment direct to the insurer.
- 17.10. The Co-operative supplies replacement controlled entry key fobs at a charge to the tenant. The Co-operative will receive cash payments in this respect and issue tenant with receipt accordingly.
- 17.11. The appropriate Housing Officer will be responsible for receiving £1 Share Receipts. This membership fee must be passed as soon as possible to the Corporate Services Section for recording and banking.
- 17.12. The Finance Assistants and Corporate Services Assistant will be responsible for the collection and recording of all payments received regarding Rechargeable Repairs, Controlled Entry Keys, miscellaneous rent payments and any other payments received. The Finance Assistants will be responsible for the collection and administration of Share Issue monies. These sums should be transferred to The Finance Assistant as soon as is practicable and these receipts should be banked on a monthly basis.
- 17.13. In the absence of the Finance Assistants on annual leave etc, the Corporate Services Assistant and/or Projects Officer will assist with basic finance duties including receiving payments at reception, issuing of petty cash and cheque writing.

18. Irrecoverable Income

- 18.1. The writing off of irrecoverable income must be approved by the Management Committee.
- 18.2. The Depute Director, Assistant Director (Tenancy Services), Assistant Director (Corporate Services) and the Director (in conjunction with any other appropriate Senior Officer, dependant on nature of write off) will be responsible for making an appropriate recommendation for write off in a written report to the Management Committee.

- 18.3. Adequate bad debt provision must be provided for to offset the impact of writing off bad debt. This shall be in line with the Co-operative's policy on Bad Debt Provision.

19. Insurances

- 19.1. The Assistant Director (Corporate Services) will effect all insurance cover and negotiate all claims in consultation with other officers where necessary. The Assistant Director (Property Services) may take forward tenanted property and common area claims if appropriate.
- 19.2. All Senior Staff (or their delegated officer) will advise the Assistant Director (Corporate Services) in writing of any events likely to result in a change to the Co-operative's insurance requirements.
- 19.3. The Policy and Procedures for all insurances are as laid out in the Co-operative's Insurance Policy and Procedures.

20. Treasury Management

- 20.1. The Assistant Director (Corporate Services) will be responsible for Treasury Management as laid down in the Co-operative's Treasury Management

21. Purchase Orders

- 21.1. Purchase orders shall be issued for all work, goods, or services to be supplied to the Co-operative except for suppliers of public utility services or for periodic payments such as rent or rates.
- 21.2. A copy of each order shall be retained for internal and external audit purposes.
- 21.3. Orders are to be approved and signed only by designated budget holders or persons authorised to do so by them, as per the Standing Orders.
- 21.4. Where spend on an individual item is large or of a non-routine nature, competitive quotes must be sought before any order is placed. The Co-operative's Procurement Policy should be adhered to.
- 21.5. The payment of invoices for works, goods or services, must be in line with the Co-operative's Procedures for Processing Invoice Payments.

22. Expenditure

- 22.1. The Co-operative shall seek to obtain value for money in terms of its fixed asset investments, its contractual commitments and in its day-to-day operational activities.
- 22.2. Only designated officers shall have authority to incur expenditure.
- 22.3. Designated Officers are appointed by The Director.
- 22.4. Designated Officers can only incur expenditure for which they are responsible.
- 22.5. No expenditure, capital or revenue, shall be incurred without adequate provision in the budget. Approval must be given by the Finance Sub Committee or Management Committee for any significant overspend in budget.
- 22.6. Payments must only be made as set out in the Co-operative's Procedures for Processing Invoice Payments.
- 22.7. All salary/wage rates must be approved by The Management Committee.
- 22.8. Processing of salary payments will be the responsibility of the Assistant Director (Corporate Services) with delegated authority to the Finance Assistant for routine weekly/monthly administration. All overtime payments must be authorised by the appropriate Senior Officer and in the case of the Director by one of the office bearers.
- 22.9. Due to the transfer of weekly paid employees from G.D.C., the Co-operative offers staff the option of weekly or monthly salary payments. Weekly payments will be on the Thursday of each week, monthly payments on the 24th of the month. Generally office based staff shall be paid monthly, Concierge staff and temporary staff shall be paid weekly, however this may be assessed on an individual basis. Every effort should be made to encourage new staff to opt for monthly paid salary. If the normal pay day falls on a weekend day or a public/bank holiday, the pay will be advanced to the nearest working day. The December pay may be paid earlier in the month to take into consideration public holiday arrangements and bank holidays.
- 22.10. All expenditure must be in line with the Co-operative's Procurement Policy.

23. Travelling, Subsistence and Expenses

- 23.1. All expenses should be administered in line with the Co-operative's Policy Statement on Committee/Staff Expenses.

24. Gifts, Hospitality and Interests

- 24.1. The giving and receiving of gifts and hospitality shall be in accordance with the Co-operative's Entitlements, Payments and Benefits policy.
- 24.2. All Committee members and staff shall ensure that they declare any interest with regards to any aspect of the Co-operative's activities as required by our Rules and regulatory requirements.

25. Internal Audit

- 25.1. The Co-operative has an Internal Audit Policy appropriate to its size and complexity.

26. Books, Registers and Computer Data

- 26.1. The Co-operative shall keep books, registers and computer data as per the Privacy Policy and Information Security Management System.

27. Security

- 27.1. Each Senior Officer is responsible for maintaining proper and adequate security at all times for furniture, equipment, cash and other assets under their control. The Director is responsible for overall security and any risks to the Co-operative must be notified to the Director immediately.
- 27.2. Current staff members are all office key holders. The concierge station holds a set of office keys for emergency call out circumstances (e.g. alarm activations). All committee members have a single Yale key to enable access within normal working hours and to attend evening meetings when there is a staff member in attendance.
- 27.3. Petty cash/safe key holders are the Assistant Director (Corporate Services) and the Finance Assistant. At times of annual leave of either of these two employees or at times of essential competing priorities, any other senior member of staff, the Corporate Services Assistant or the Projects Officer may hold a set of petty cash/safe keys to assist with basic finance duties as highlighted previously within these regulations.
- 27.4. The responsibility for the maintenance of the petty cash system on a day to day basis will be with the Finance Assistant, followed by the Assistant Director (Corporate Services), followed by the Corporate Services Assistant. In exceptional circumstances, the Projects Officer will also be an authorised safe key holder and to administer

basic duties such as collection of cash and issuing of cash and credit cards when required.

- 27.5. In the event of planned leave or unexpected leave of all four above, the keys to the safe and petty cash box shall be passed (where possible) to the Depute Director, Assistant Director (Property Services) or Assistant Director (Tenancy Services) (in that order) who shall then assume responsibility for access to the safe and petty cash.
- 27.6. The Petty Cash float and the Phil Welsh Fund float shall be checked on a weekly basis.
- 27.7. The Corporate Services Assistant may have access to the safe keys throughout the day to enable them to assist with routine financial duties.
- 27.8. Company Credit Cards are under the control of the Assistant Director (Corporate Services). Strict procedures are in place for the use of and administration of the credit card system. The Corporate Services Assistant will check all credit card bills within 24 hours of receipt and immediately report any discrepancies to the Assistant Director (Corporate Services). The Projects Officer will be responsible for reconciling all Whitcomm charges made via the company credit cards and report any discrepancies to the Assistant Director (Corporate Services).
- 27.9. The IT Officer will be responsible for ensuring that daily copies of computer data are made and that these are stored in a safe, remote location. Delegated authority may be passed to other members of the Corporate Services team when appropriate and agreed in advance.
- 27.10. Access to computer systems must be restricted by the appropriate use of passwords etc. which should never be shared.
- 27.11. Robust IT policies and procedures will be in place and adhered to by all staff and committee to prevent accidental or fraudulent misuse of our IT systems.
- 27.12. The Director shall ensure that there are adequate systems in place covering the security and use of all data (personal and sensitive information) relating to applicants, tenants, members of staff, contractors and of the public held either in electronic or paper format, to comply with the Data Protection Act (2018) and the General Data Protection Regulations.
- 27.13. The Co-operative has CCTV coverage of the office building.

27.14. The loss of office, property or safe keys must be notified to the Director immediately.

28. Grants for Development Works

28.1. The Assistant Director (Property Services) shall be responsible for ensuring that adequate accounting systems are in place to enable the Co-operative to comply with The Scottish Government's procedural conditions in connection with the receipt of Social Housing Grant and Allowances.

28.2. The Assistant Director (Property Services) will ensure that arrangements are in place to claim the full and appropriate capital grants.

Related Documents

Policies

Bad Debt Provision

Committee Expenses

Contract Management

Entitlements, Payments and Benefits

External Audit

Information Security Management System

Insurance Policy and Procedures

Internal Audit

Privacy Policy

Procurement Policy

Rent Collection and Accounting

Standing Orders

Treasury Management

Procedures

Procedures for Processing Invoice Payments

Procedures for the Receipt of Income

Procedures for Cheque Signing

Administration of Petty Cash System

Policy Implementation Checklist

Equality and Diversity Compliant	N/A
Equality Impact Assessment required	N/A
Data Protection (GDPR) compliant	Yes
Health & Safety compliant	Yes
Training requirements	Refresher for Corporate Services staff
Regulatory Framework Assurance Information Bank Updated	GS 1.3
Policy Implementation	
Reporting arrangements Finance Sub Committee Management Committee	Approval Ratifies Housing Sub Committee Approval
Policy register updated	
Published on Website	
Publicity material issued	N/A

Related Policies

Bad Debt Provision
Committee Expenses
Contract Management
Entitlements, Payments and
Benefits
External Audit
Information Security
Management System
Insurance Policy and Procedures
Internal Audit
Privacy Policy
Procurement Policy
Rent Collection and Accounting
Standing Orders
Treasury Management