



GROUP POLICY ON FINANCIAL REGULATIONS

POLICY IMPLEMENTATION CHECKLIST	
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1 INTRODUCTION

- 1.1 Caledonia Housing Group (referred to as the 'Group' in this document) comprises Caledonia Housing Association and Cordale Housing Association.
- 1.2 The purpose of these Financial Regulations is to define the principal policies and procedures that must be followed by all staff when dealing with the Group's financial affairs.
- 1.3 These Regulations have been approved by the governing bodies of Caledonia and Cordale Housing Associations. They will be reviewed every three years as a minimum. The absence of such a formal review will not, however, cause these Regulations to lapse. These Regulations form part of the Standing Orders of the organisation.
- 1.4 It is the responsibility of the Executive Director of Finance to make arrangements to ensure that these Regulations are adhered to. The Executive Director of Finance may delegate such tasks as may appear appropriate from time to time. Such delegation may be explicit or may be implicit in the nature of an employee's title or job description. Failure to comply with these Regulations may lead to disciplinary action being taken against the employee or employees concerned.
- 1.5 The Executive Director of Finance is also responsible for the production of detailed financial procedures in relation to the matters covered by these Regulations.
- 1.6 A copy of these regulations will be placed on the Group's intranet. It is the responsibility of the Executive Director of Finance to advise all other Directors that the Regulations have been updated and are available. It is the responsibility of Directors, Heads of Service and Managers to ensure that their staff have access to the latest version of these Regulations and that they are aware of the implications for their work.

Abbreviations/Definitions

- 1.7 "EMT" means Caledonia's Executive Management Team consisting of the Chief Executive, Executive Director of Finance, Executive Director of Operations and Executive Director of People & Governance. Where these Regulations require a decision from EMT, it must be recorded in writing.
- 1.8 "Directors" means Caledonia's Chief Executive, Executive Director of Finance, Executive Director of Operations and Executive Director of People & Governance. "Directors" should be construed accordingly.
- 1.9 "Heads of Service" means Head of Frontline Services, Head of ICT, Head of Finance, Head of People, Culture & Communications and Head of Investment & Sustainability. "Heads of Service" should be construed accordingly.
- 1.10 "Managers" means, Governance Manager, Asset Manager, Development Manager, Customer Services Manager, Regional Managers, and Housing Services & Support Manager. "Managers" should be construed accordingly.

General

- 1.13 All references to financial limits are to figures that are exclusive of any applicable Value Added Tax.
- 1.14 These financial regulations will be reviewed by the EMT in conjunction with Group Standing Orders and the Group Policy on Delegated Authority to avoid inconsistency.

2 FINANCIAL PLANNING, BUDGETARY CONTROL AND MANAGEMENT ACCOUNTING

- 2.1 It is the responsibility of the Group Chief Executive to ensure that a Business Plan is prepared for the Caledonia Group. The Business Plan will include detailed financial forecasts for the organisation's operations for the next five years and summarised projections for the next thirty years. These forecasts must include Individual Statements of Comprehensive Income, Statements of Financial Position, and Cash Flows for the period of the plan, as well as key financial ratios, particularly those monitored by the organisation's funders and the Scottish Housing Regulator. In addition, comprehensive sensitivity analyses will be carried out on the Business Plan base financial forecasts. The Business Plan is to be reviewed annually, and the revised plan should be presented to the Governing Body at or about the same time as the five year rolling budget.
- 2.2 It is the responsibility of the Executive Director of Finance to ensure that financial forecasts, consistent with those approved by the Governing Body, are submitted to the Scottish Housing Regulator in accordance with the Scottish Housing Regulator's requirements. Financial forecasts will also be prepared in such a manner as to give information, analysis and projected outturns to the Directors and Heads of Service
- 2.3 It is the responsibility of the Executive Director of Finance to ensure that a five year rolling budget is prepared at least annually for each organisation in the Caledonia Group. This budget must be prepared in sufficient time to present it to each organisation's Governing Body for its formal approval before the commencement of the financial year to which the budget relates. The budget will be consistent with the Business Plan priorities for each organisation in the Group. The Executive Director of Finance also has responsibility for ensuring that revised budgets are prepared where appropriate during any financial year where there has been a material change in the underlying assumptions upon which the original budgets were based.
- 2.4 In preparing the budget, the Executive Director of Finance will consult with and issue budget templates to the Executive Management Team (EMT), budget holders and such other staff as may from time to time be agreed by EMT. A draft budget will then be prepared that best meets the needs of each of the Group organisations, given the resources available.
- 2.5 Before draft budgets are presented to each of the Governing Bodies, they will be considered by the Executive Management Team who will agree final drafts for presentation.

- 2.6 The format of the budget will be broadly in line with management accounts that are prepared for each of the Governing Bodies, unless any Governing Body has asked for specific additional information to be provided or for its format to be changed. Papers for each of the Governing Bodies will also provide a written commentary.
- 2.7 Each Director will be responsible for the budget for their Directorate. Accordingly, the Executive Director of Finance will ensure that each Director is furnished with a budget setting out the amounts they are responsible for by 1 April each year.
- 2.8 The exercising of financial actions delegated to all officers of the Group is only permitted where the expenditure that would be committed is within budget and is consistent with appropriate policies.
- 2.9 In the event that it is anticipated that the final outturn for an element of income or expenditure in the financial year will be materially different to the approved Budget, the variance and remedial action must be reported to the Governing Body via the quarterly management accounts.
- 2.10 Changes to the structure or number of senior staff (Directors) will require the Caledonia Governing Body's approval. Changes in the establishment of all other staff must be agreed by the EMT. All proposed changes must be contained within the overall cost budget.
- 2.11 Any proposal to lease assets, rather than commit to capital expenditure financed from capital budgets must be referred to the EMT (together with reasons why leasing is the preferred means of acquiring the asset concerned) before commitment, for a review of the financial effects of leasing. Caledonia will capitalise the cost of assets acquired under most leasing arrangements. The authority to order leased assets will be based on the total payments under the lease. For example, if an asset is to be leased at a payment of £5,000 pa for six years, the person signing the lease must have authority to sign for expenditure of £30,000.
- 2.12 The Executive Director of Finance will ensure that each of the Governing Bodies is presented with management accounting information in line with the approved schedule of Governing Body meetings. The Executive Director of Finance will also oversee the presentation of monthly budget monitoring information to budget holders and EMT. In addition, the Executive Director of Finance will provide such other management information to Directors as requested by them individually or by EMT.
- 2.13 In all reports to each of the Governing Bodies, other than those for information only, where the paper identifies that there will be an implication for the finances of the organisation, the Executive Director of Finance will be required to provide comments for inclusion in the report. These comments will include the anticipated financial risk in the financial year under review and the anticipated cost for a full five year planning cycle. Where there will be a substantial long-term commitment, and in particular when reviewing the financial consequences

of bids to the Scottish Government, the effect on the organisation's longer term forecasts will also be identified.

- 2.14 It is the Group's policy to prepare its annual statutory accounts on an accruals basis. Given this, expenditure is incurred when the goods in question are delivered or the services in question are provided. In order for funds to be allocated to a particular year's budget, it will not be sufficient to merely order the goods, or to arrange for a supplier to supply an invoice dated within the financial year. Invoices should only be submitted by suppliers once the related goods or services have been received.
- 2.15 Monthly budget monitoring and quarterly management accounts will be prepared on the basis of commitment accounting where actual expenditure in the period plus all committed expenditure is included. In practice this means that if a contract is entered into or order placed for goods or services to be delivered at a future date this expenditure will be accounted for in the first available reporting period after the commitment.
- 2.16 For planned and cyclical maintenance budgets no more than half of the annual budget can be committed in the first six months of each financial year, and no more than three quarters of the annual budget can be committed in the first nine months of each financial year.

3 INCOME AND WRITE OFFS

- 3.1 Wherever practicable, all income received by post must be opened in the presence of two members of staff who should not be otherwise responsible for cash. All remittances received must be recorded in a register. This register is to be periodically and independently checked against bank statements.
- 3.2 All income (whether received through the post or not) of more than £1,500 must be banked on the day of receipt. All income not banked on the day of receipt must be banked by the end of the following working day. Staff should at all times operate in accordance with the Group Anti-Money laundering Procedures when handling income receipts.
- 3.3 The Head of Finance will issue guidance in relation to the handling of cash at housing developments with staffed offices.
- 3.4 Each organisation in the Group is to be safeguarded against loss of income by:
- ***prompt claiming of all Local Authority, Scottish Government, and other public body grants, subsidies and allowances***
 - ***prompt registration of fair rents and service charges. Any decision not to re-register rents and service charges promptly must be approved by the Governing Body***
 - ***prompt claiming of all charges payable by residents, local authorities, the Department for Work and Pensions and others for accommodation and care provided at each organisation in the Group***
 - ***prompt notification to all tenants, shared owners, factored owners and other occupiers of any increases in charges due. This***

notification is to include advice that the resident concerned may need to re-apply for Universal Credit or other benefits

- **prompt action against all debtors and the institution of recovery proceedings wherever appropriate**
- **comprehensive accounting procedures and internal controls for all income sources.**
- **All income must be banked gross, and no expenses deducted from income.**

3.5 Changes to the rental debit equal to or less than one week's rental income must be authorised by the Regional Manager all other changes must be authorised by the Executive Director of Operations or Head of Frontline Services.

3.6 Authority levels for writing off outstanding rent arrears for former tenants and residents are set out in the table below:

Extent of arrears	Authorisation Level
Up to 1 week	Neighbourhood Officer
Up to 4 weeks	Area Leader
Up to 8 weeks	Regional Manager
>12 weeks	Executive Director of Operations
Annual Review of Write Offs	Executive Management Team

It is the responsibility of the Executive Director of Operations to ensure that irrecoverable amounts are written off promptly and to ensure that a review is carried out immediately prior to the year end. A summary of the amounts written off by staff should be presented to the Governing Body. In addition, the Executive Director of Finance (monthly reconciliation) will ensure that a provision is maintained equal to 100% of all former tenant and resident's debts plus an appropriate provision for those current tenant and resident debts deemed to present a high risk of default.

3.7 Non-recoverable other owner's costs up to £1,000 may be written off on the authority of the Asset Manager and tenant's re-chargeable repairs up to £1,000 may be written off on the authority of the Regional Manager. The Heads of Service can approve write offs up to £2,000 and members of the Executive Management Team write offs in excess of £2,000. A summary of amounts written off by staff should be presented to the Governing Body annually.

3.8 Personal cheques will not be cashed, nor will IOU's be accepted out of money held on behalf of each organisation in the Group.

- 3.9 Any refund of rent to an existing or former tenant must be approved by a Team Leader or Regional Manager. In all cases refunds must be independently checked. The check must be evidenced on the requisition form.
- 3.10 The Group's Executive Director of Operations or the Head of Frontline Services will be responsible for the negotiation and subsequent approval of all Supporting People Contracts issued by Local Authorities.
- 3.11 The Head of Finance will maintain a register of Supporting People Contracts and be responsible for the prompt claiming of all amounts due to be received.
- 3.12 The Head of Front Line Services will issue formal instructions to staff detailing how rent arrears should be collected under the Group Arrears Management Policy. All rent and service charges and any other monies collected by staff based at housing developments must be dealt with in accordance with current procedures as directed by the Executive Director of Finance. All monies must be banked according to the instructions in paragraph 3.2.
- 3.13 Contracts other than tenancy agreements which relate to income must be signed by a Manager, a Head of Service or a Director, unless they are for an annual sum of more than £25,000, when they must be signed by a Head of Service, where over £50,000 this must be signed by a Director. Tenancy agreements may be signed by a Neighbourhood Officer.
- 3.14 Where any organisation in the Group invoices customers for work or services carried out, it is Group policy to require payment in 30 days, unless special circumstances exist. Special circumstances might include rental payments under a lease, where payment would be expected on the due date.

4 ORDERS

- 4.1 Each Director will have overall responsibility for all orders issued from his or her Directorate for goods to be supplied, work to be done or services rendered.
- 4.2 Purchase orders including maintenance orders must be authorised by the relevant member of staff as per the schedule of delegated authorities detailed below.
- 4.3 Staff authorising any order must ensure that the expenditure to be incurred is covered by one of the following sources:

Funding authorities
Approved budgetary provision

- 4.4 If it proves necessary to issue a verbal order, this must be confirmed by a written order within one working day.
- 4.5 Before placing any order, the member of staff concerned must ensure that the organisation's policies on tendering and quotation detailed below have been properly applied.

- 4.6 Purchase orders must be used for all work, goods or services to be supplied to the Group except for supplies of public utility services, or periodic payments such as rent or rates, for petty cash purchases or for any other exceptions that the Executive Director of Finance or Head of Finance may approve from time to time. Special arrangements will be made for capital works (see section 7.15).
- 4.7 All orders will show the agreed price, or in cases where this is not practical, the estimated price. In the event that the subsequent invoice does not accord with the agreed price or exceeds an estimate by more than 10% or £50 whichever is the higher, the reason for this must be identified.
- 4.8 The Group's policy on Entitlement, Payments and Benefits sets out the controls and limits in place regarding gifts and hospitality. This applies to any external sources and includes contractor or suppliers that provide goods and services,
- 4.9 Orders may not be split or otherwise placed in a manner devised to avoid the financial thresholds.
- 4.10 Goods may not be taken on trial or loan in circumstances that could commit the Group to a future uncompetitive purchase.

5 ORDER AUTHORISATION

- 5.1 Limits (all limits include VAT and subject to available budget):

Caledonia Group

Level 1 – No limit

Directors – Within Budget

Level 2 – Limit of £50,000

Heads of Service

Level 3 – Limit of £25,000

Managers

Level 4 – Limit of £10,000

Team Leaders

Level 4 – Limit of £1000

Officers

Level 5 – Limit of £500

Customer Solutions Advisors

Business Support Assistants

Cooks

Scheme Managers

5.2 Orders may only be authorised by post holders specifically identified on the above list.

5.4 Signatory limits may only be amended on the authority of the Governing Body.

Notes to signatory limits

5.5 Scheme Funds relate to specific schemes and may be expended on appropriate matters, subject to sufficient funds being available, upon the request of the relevant Neighbourhood Officer/Scheme Manager and authorisation in accordance with section 5 above.

6 TENDER AND QUOTATION MATTERS

6.1 Each organisation in the Group will follow good practice in selective tendering including references to published guidance by the Scottish Government, The Scottish Housing Regulator, the Joint Contracts Tribunal and other relevant authorities.

6.2 Further guidance on procuring goods, supplies and services are contained in the Group Procurement Policy.

Placing of Orders or Contracts

6.3 The following procedures for placing orders or contracts shall be followed where the anticipated amount of the order or contract is:

Below £30,000	The EMT have discretion to decide whether competitive quotations are obtained, subject to agreed costs being reasonable in comparison to other providers
Between £30,000 and £50,000	At least three competitive quotations must be obtained and a record of the quotations kept.
Above £50,000	The Group's tendering procedures must be followed.

6.4 The only exceptions to the above are as follows. The use of any of the following will require the consent of the appropriate Executive Director, Head of Service or Manager in accordance with the authorisation levels detailed in section 5.

In relation to building works and development proposals:

- where a developer or other party brings an opportunity to any of the organisations in the Group and the terms of the proposed arrangements will require the organisation to contract with a named building company.
- where consultants are being used and there is a reason to offer a particular firm the work (for example if they have unique skills or have carried out work at risk).
- where works have been included as part of a schedule of rates contract which has been tendered in the usual way and the cost of the repairs does not exceed £50,000.
- where goods and services are sold at a fixed price and no satisfactory alternative is available.
- where goods and services are only available from a limited number of suppliers – in which case, a reasonable number should be invited to quote.
- where goods and materials are of a proprietary nature and no satisfactory alternative is available.
- where for other definable reasons open competition would not be appropriate e.g. in the case of long-term agreements negotiated tenders or monopolies.

In relation to other business activities:

- where external organisations are being used and there is a reason to offer a particular firm the work (for example if they have unique skills or have carried out work at risk).
- where services are provided at a fixed price and no satisfactory alternative is available.
- where services are only available from a limited number of external organisations – in which case, a reasonable number should be invited to quote.

Tender Openings

6.5 Tenders will be administered in accordance with the Group Procurement Policy.

Other Matters

6.6 Nothing in these arrangements shall prevent staff from instituting more formal arrangements than those detailed above, should they so decide in order to promote a spirit of competition.

7 PAYMENTS

- 7.1 Apart from petty cash expenditure, the normal method of payment of money due from each of the organisations in the Group will be by on-line transactions, or by BACS payment or by exception a cheque drawn on the organisation's bank account.
- 7.2 In the majority of cases all requests for payment will be subject to a matching process with the relevant order. Subject to pre-determined tolerance limits all invoices matching order values and/or quantities will be submitted for payment without further authorisation. Requests for payment falling out-with the preauthorised order system will be subject to the undernoted controls
- 7.3 Staff authorised to approve payments are listed at section 5. The authoriser must be aligned to the Directorate where the expenditure will be charged.
- 7.4 The approval of invoices for payment unless automatically matched to an order will be evidenced by the relevant member of staff approving the original document. The approval of an invoice for payment means that:
- ***the goods have been duly received, examined and approved in accordance with the specification, are satisfactory, and are in accordance with the contract or order;***
 - ***the work done or services rendered have been satisfactorily carried out and where applicable the materials used were of the requisite standard.***
 - ***the account is arithmetically correct, and prices are in accordance with the original order.***
 - ***no other account has been paid in respect of the goods received or work done;***
 - ***the relevant expenditure has been properly incurred on the organisation's legitimate business; and***
 - ***the relevant expenditure has been properly coded.***
- 7.5 Where invoices are paid against an order and goods received, the person signing for the goods must ensure compliance with sections 7.4 and 7.5 above. Photocopies (including fax copies) of invoices will not be accepted unless certified by the supplier. The person signing off a copy of the original invoice will be required to confirm that the original has not been received or that it has (after enquiry) been lost.
- 7.6 Invoices for ordinary trade accounts must not be made out by employees of the organisation.
- 7.7 All statements sent by suppliers should be processed in accordance with financial procedures operating in the Group.
- 7.8 It is the Group's policy to make payments to suppliers within 30 days of the date on the invoice. The date on the invoice should be the date that the goods are supplied or the service rendered. In the event that such date has been pre-dated by the supplier, the correct date of the receipt should be shown on

the invoice by the person approving it. The principal exceptions to this rule are as follows:

Works under JCT contracts or equivalent. These will be paid by their contractual date which will generally be 14 or 21 days after the issue date of an employer's agent certificate, unless otherwise stated.

Utilities (gas/telephone/electricity). These will be paid on the next payment run after their receipt in accordance with agreed financial procedures operating in and between each of the organisations in the Group.

Business Rates and Water Rates. These will be paid by their due date or by their last date for which discount can be claimed. Agreed financial procedures operating in and between each of the organisations in the Group, will ensure sufficient time for a payment run to be carried out between the time of receipt and the time that they are due for payment.

Loan interest and Capital Repayments. These will be paid in accordance with the individual lenders terms as detailed in the facilities agreements.

Others. Any other exception that may be agreed by the Executive Director of Finance or the Head of Finance.

- 7.9 The payment runs will be carried out once per week, but additional payment runs can be made to ensure that payment to suppliers is made within 30 days, in order to meet Group policy or for urgent rent refunds to tenants.
- 7.10 Urgent payments will be made as far as possible by on-line transactions but exceptionally may be made by manual cheque, with such exceptions to be agreed by the Executive Director of Finance or the Head of Finance.
- 7.11 The Head of Finance may make other arrangements for payment of particular invoices e.g. CHAPS payments to speed up payments if deemed necessary.
- 7.12 Standing orders or direct debit instructions must be authorised by a member of staff in the relevant Directorate. For the purpose of calculating the amount, the limit of authority will be determined by reference to the annual amount payable. The use of standing orders or direct debits should be kept to a minimum.
- 7.13 Where an order is placed, then the receipt of goods may be signed for by anyone identified in the procedures detailed in paragraph 5
- 7.14 The Executive Director of Operations, Executive Director of Finance, Head of Investment & Sustainability, Head of Finance, Asset Manager, and Development Manager are authorised to confirm payment for JCT building contract payments without limits which are certified by an appropriate external professional adviser and within budget. They may also approve payments without limit to solicitors for land purchase, provided the purchase has been approved by the Governing Body and the figure has been confirmed by the solicitor in writing.

- 7.15 Internal transfers between bank accounts held within Caledonia HA or Cordale HA may be authorised without limit by the Executive Director of Finance or Head of Finance provided they fall within parameters laid down in the Group Treasury Management Policy. Under no circumstances can funds be transferred between Group entities unless subject to an inter-company lending agreement approved by each Association's Governing Body.
- 7.16 The responsibilities for the payment of accounts are set out in the 'Payment Process Procedures' which document the controls to be followed by all individuals involved in the payment process in order to safeguard the assets of the organisations in the Group. Any failure by staff members to follow these procedures may result in disciplinary action.

8 PETTY CASH

- 8.1 The Finance Team will provide certain locations in the Group with a petty cash float. All such floats shall be maintained on the imprest system. Imprest amounts are determined by expenditure levels and security considerations. The amounts may be varied from time to time on the authority of the Head of Finance.
- 8.2 Payments from petty cash will exclude the following:

- ***staff expenses as defined in this policy***

- 8.3 Petty cash should only be used for small items. Where a payment of more than £50 but less than £100 needs to be made, approval must be obtained from a Finance Officer. The Head of Finance needs to approve all petty cash > £100 with appropriate justification provided. This approval should be obtained before the cash is expended or, if outside normal working hours, on the next working day.
- 8.4 Employees responsible for petty cash must obtain vouchers as evidence of disbursement by claimants wherever possible and in all cases where Value Added Tax is charged
- 8.5 IOUs must not be used. No personal cheques will be cashed.
- 8.6 All claims for reimbursement of petty cash must be signed off by the manager in the location and team concerned. Agreed financial procedures operating in and between each of the organisations in the Group, will ensure claims will be treated as an invoice and be processed in the next cheque run in accordance with the timetables set out in section 7.10.
- 8.7 The Manager at the relevant location will be responsible for ensuring that all cash balances are kept in a locked cash box or safe.

9 SALARIES AND WAGES

- 9.1 Payment of all salaries and placement on a scale for new employees (subject to authorisation by an Executive Director) will be made by the Finance Team

under arrangements made by or agreed with the Head of Finance. Salaries will be paid on the third last working day of the month.

- 9.2 All amendments to pay and all information regarding appointments, terminations, resignations and other circumstances permanently affecting the remuneration of employees shall be authorised by the relevant Manager, Head of Service or Executive Director and sent to the Human Resources Team. Once authorised, the Human Resources Team will pass the details to the Finance Team who will ensure implementation and confirm the action taken back to the originator. All forms used for the purpose of communicating pay information must be in the format agreed by the Head of Finance and Head of People, Culture and Communications.
- 9.3 All changes to monthly salary must be notified to the Finance Team by the relevant staff by the 17th of the month in which the payment is to be made.
- 9.4 Directors and Heads of Service have authority to authorise overtime payments within the budgetary limits. No one may authorise their own overtime.
- 9.5 All appointments of employees will be consistent with the Group conditions of service and employment policies. All payments to employees will be consistent with employees' contracts of employment, and in accordance with the Group Entitlement, Payment and Benefits Policy.
- 9.6 All salaries will be paid through the payroll system and not through petty cash, regardless of how small the amount or how short the period of employment.
- 9.7 Any overpayments of salaries or wages will be recovered from the recipient as agreed by the Executive Director of Finance who will have authority to write off overpayments of up to £250. Larger write offs will require the authority of the Chief Executive.
- 9.8 The Head of People, Culture & Communications is responsible for ensuring that details of staff sickness are communicated to the Finance Team
- 9.9 The final payroll listing will be reviewed by the Head of Finance or Executive Director of Finance before being released for payment. The person who prepared the payroll listing must not carry out the review.
- 9.10 All changes to fixed point salaries and/or salary scales including cost of living awards must be approved by the Governing Body which will consider recommendations brought forward from the Remuneration Committee.

10 EXPENSES

- 10.2 The following items are regarded as expenses for the purposes of these regulations – travel and motor costs, subsistence, incidental expenses.
- 10.3 Expense claims must be submitted on a regular basis, but no more frequently than monthly. All claims by employees for payment of travelling expenses, subsistence allowances or any other incidental expenses shall be submitted

on the form required by the Finance Team and comply with relevant internal procedures. Certification of a claim will be taken to mean that all journeys are authorised, and expenses are properly incurred on the business of the organisation.

- 10.3 All expenses will be paid through payroll. Expenses will be processed in accordance with the timetable set out in section 9.1 and 9.3 above.
- 10.4 Staff permitted to authorise expenses claims are set out at the end of this section. No person may authorise their own expenses.
- 10.5 The level of expenses to be paid and the circumstances under which they can be claimed are set out in staff terms and conditions of service and relevant internal procedures.
- 10.6 Where a staff member regularly incurs significant expenses in the course of an organisation's business, the Executive Director of Finance or Head of Finance is authorised to issue an advance upon request by the relevant Manager or Head of Service. The advance will not exceed the normal monthly claim for the relevant employee. Similar arrangements will also be applied where an employee will incur significant expenses on a one off basis - e.g. when attending a conference. In these cases, an advance may be made towards the expenses expected.
- 10.7 Staff permitted to authorise expenses claims are as follows:

Expenses Incurred by:	Authorised by:
Scheme Assistants	Scheme Manager
Other scheme based staff	Scheme Manager
Scheme Managers	Retirement Housing Team Leader or Registered Manager (Very Sheltered)
Scheme Cleaning Operatives, Volunteer Coordinator or Community Engagement Worker	Retirement Housing Team Leader
Estates Operatives	Estates Supervisor
Officers / Assistants / Estates Supervisor / Clerk of Works / Business Partners	Team Leaders or Managers
Team Leader / Regeneration Coordinator / Climate Change Coordinator / Procurement Lead / Senior Business Partner	Manager
Managers	Heads of Service

Heads of Service	Directors
Directors	Chief Executive
Expenses Incurred by:	Authorised by:
Chief Executive (see 10.8 below)	Executive Director of People and Governance or alternative director in absence of Executive Director of People & Governance.
Caledonia Governing Body Board (excluding Chair) (see 10.8 below)	Chief Executive Executive Director of People & Governance
Chair	Chief Executive Executive Director of People & Governance

- 10.8 Caledonia's Chair should review expenses submitted by the Group Chief Executive and Governing Body Members from time to time and not less often than once in each financial year. For Cordale the Executive Director of People & Governance will assist the Cordale's Chair in managing the equivalent task.

11 Credit Cards

11.1 Purpose and Scope

This section sets out the governance, approval, use, and monitoring requirements for Association credit cards issued by the Caledonia Group. It applies to all employees who are issued with an Association credit card and all employees authorised to approve related expenditure.

Association credit cards will only be issued where a clear, demonstrated, and ongoing business need exists, and where alternative payment methods, as detailed elsewhere in these Financial Regulations, are not practical. Where a member of staff regularly incurs significant business-related expenditure, a credit card may be requested by the relevant Line Manager via email to finance@caledonia.co.uk.

This section supports compliance with the Scottish Housing Regulator's Standards of Governance and Financial Management and reflects public-sector best practice in the control of payment instruments.

11.2 Issuance and Credit Limits

All requests for Association credit cards must be reviewed and approved by the Head of Finance. Where approved, credit cards will be issued with limits aligned to the cardholder's role and invoice approval authority.

Any subsequent changes to credit limits must be authorised by the relevant Line Manager and approved by the Executive Director of Finance.

11.3 Annual Confirmation / Re-Authorisation

The continuing need for all Association credit cards will be reviewed annually by the Finance team. Cards where a demonstrable business need no longer exists will be withdrawn.

11.4 Cardholder Responsibilities and Permitted Use

Association credit cards may be used solely for legitimate, necessary, value for money, and demonstrate responsible stewardship of public funds

expenditure incurred in the course of an employee's role. Permitted expenditure includes, but is not limited to, travel and accommodation, meals while on approved business, subscriptions, professional fees, and the purchase of goods or services required for normal business operations.

Credit cards must not be used for personal expenditure, cash withdrawals, or for any items not directly related to the Group's activities. All transactions must comply with the Group's Financial Regulations, Expenses Policy, and any other relevant policies in force.

- Cardholders are personally responsible for:
- Safeguarding their credit card and card details at all times
- Ensuring all expenditure is legitimate, necessary, and policy-compliant
- Retaining and submitting valid supporting receipts on a monthly basis
- Reviewing card statements for accuracy and completeness
- Immediately reporting any lost, stolen, or potentially fraudulent cards or transactions to the Finance Team and the card provider
- Returning Association credit cards immediately upon cessation of employment, change of role, or at the request of the Finance Team

11.5 Expense Submission and Approval

On a monthly basis, cardholders must complete the approved expenses template, detailing all credit card expenditure incurred during the relevant period and attaching appropriate supporting documentation. Expense claims must be approved by the cardholder's Line Manager prior to submission to the Wage Claims Team at wageclaims@caledoniaha.co.uk for processing.

Receipts must be itemised, legible, and submitted within 14 days of the statement date. Failure to submit expenses and supporting documentation within the required timescale may result in recovery of costs through payroll.

Under no circumstances may cardholders approve their own credit card expenditure.

11.6 Monitoring and Review

The Finance Team reserves the right to review all Association credit card transactions at any time, and credit card usage may be subject to internal and external audit.

The Finance Team will ensure appropriate segregation of duties re approvals is maintained at all times in line with public-sector internal control standards.

In addition, the Head of Finance will undertake a monthly review of all credit card transactions exceeding £100 to ensure compliance with the Group's Expenses Policy and Financial Regulations.

Any irregular, non-compliant, or high risk transactions identified through monitoring will be reported to the Executive Director of Finance and, where appropriate, to the Audit and Risk Committee.

11.7 Misuse and Non-Compliance

Credit card controls form part of the Groups wider counter-fraud framework and should be read in conjunction with the Anti-fraud and Whistleblowing Policies.

Misuse of an Association credit card, including but not limited to personal expenditure, failure to provide supporting receipts, or persistent non-compliance with this policy, may result in one or more of the following actions:

- Withdrawal of the Association credit card
- Recovery of funds through payroll deduction
- Disciplinary action, up to and including dismissal, and where appropriate, referral to external authorities.

12 BANKING

- 12.1 In each of the organisations in the Group, all arrangements with the organisation's bankers will be made by the Executive Director of Finance with the approval of the Governing Body. Banking services will be reviewed at intervals of no more than seven years.
- 12.2 In each of the organisations in Caledonia's Group, all cheques will be ordered only on the authority of the Executive Director of Finance or the Head of Finance. The Head of Finance will be responsible for ensuring that proper arrangements are made for their safe custody.
- 12.3 The organisation will maintain an account or accounts with Allpay for the purposes of receiving tenants' and residents' rent.
- 12.4 Authority to sign cheques (subject to inclusion in bank mandate) is delegated to:

List A

Member of the Executive Team

List B

Managers

Heads of Service

- 12.5 Authority to approve BACS/CHAPS Transfers (subject to Bankline access rights) is delegated to: -

List A

Member of Executive Team

List B

Head of Finance

Customer Services Manager

Head of Frontline Services

Head of Investment and Sustainability

Head of Business Transformation

Snr Business Partners (Finance)

- 12.6 All cheques and automated payments for a sum of up to £10,000 must carry two signatures, from List A or List B. Where the cheque or automated payment is for more than £10,000, then the cheque or automated payment must carry two signatures at least one of which is from list A and the other from either List A or List B.

- 12.7 All bank standing orders or direct debit mandates must be signed by two of the authorised signatories indicated above. For the purpose of deciding the value of the standing order or direct debit, the annual amount payable should be used.
- 12.8 All bank accounts will be reconciled at intervals of not more than one month.

13 INSURANCES

- 13.1 The Executive Director of Finance will be responsible for ensuring that each of the organisations in the Group is properly insured.
- 13.2 The Executive Director of Finance will ensure that all risks are underwritten by well-established reputable providers with a minimum B++ rating.
- 13.3 The Executive Director of Finance will ensure that all of the Group's properties are insured under a comprehensive housing stock and combined commercial insurance policy which meets the requirements of lenders who have secured their loans on specific properties.
- 13.4 Insurances will also be maintained against the following risks / categories:
- Public / Products liability***
 - Employer's liability***
 - Property owners liability***
 - Governing Body member's liability***
 - Fidelity guarantee***
 - Building contents, including cash***
 - Professional indemnity insurance***
 - Contractors all risks***
 - Legal expenses***
 - Computer***
 - Engineering***
 - Crime***
 - Cyber Liability***
- 13.5 All vehicles owned by each of the organisations in Caledonia's Group will be comprehensively insured with a reputable provider.
- 13.6 The Group will also maintain personal accident insurance so that any employee suffering serious permanent disability or death as a result of an accident during and out with working hours will receive compensation of up to three years' salary or wages. Similar arrangements apply to Governing Body members where compensation will be a fixed sum. Payment will only be made to a member of Staff or Governing Body Member if payment is made by the insurance company.
- 13.7 It is the responsibility of Heads of Service and Managers to ensure that the Executive Director of Finance is notified of any new risks, properties or

vehicles which require insurance and of alterations affecting existing insurances.

- 13.8 The Executive Director of Finance / relevant Head of Service or Manager will make appropriate arrangements to ensure that claims can be promptly made and that records are maintained of the overall number of claims made against each policy.
- 13.9 The Executive Director of Finance will review the organisations' insurances annually or more frequently and report on the results to the Governing Body.
- 13.10 Insurance arrangements for each of the organisations in Caledonia's Group will be re-tendered every fifth year (subject to long term agreements).

14 ACCOUNTING RECORDS AND AUDIT

- 14.1 The Executive Director of Finance will arrange to maintain accounting records of all the transactions entered into by each of the organisations in the Group.
- 14.2 The Executive Director of Finance and anyone acting on the authority of the Executive Director of Finance will have the right to access any information held in any part of the organisation for the purposes of ensuring that the organisation's funds have been properly accounted for. This right will also apply to Caledonia's Chief Executive and the Group's internal and external auditors.
- 14.3 The financial year of each of the organisations in the Group will be from the 1 April to 31 March. The Executive Director of Finance will ensure that financial statements are prepared and audited in time to be approved by the Governing Body prior to its Annual General Meeting. After the Annual General Meeting, the Executive Director of Finance will ensure that the accounts are filed with the Scottish Housing Regulator, Charities Regulator, and the Financial Conduct Authority within the timescales set by each body.
- 14.4 The financial statements of each of the organisations in the Group will be audited by a firm of auditors, qualified to carry out the audit in accordance with legislation and the Scottish Housing Regulator guidance, as approved in accordance with the organisation's Rules.
- 14.5 The Executive Director of People & Governance will ensure that internal audit is carried out and that the Group Internal Auditor reports to the Audit & Risk Management Committee at least four times per annum.
- 14.6 The Executive Director of People & Governance will ensure that an annual audit needs assessment is carried out by the Internal Auditors each year and submitted to the Audit & Risk Management Committee for approval prior to the commencement of internal audits.
- 14.7 The Executive Director of Finance will ensure that all financial and general lending covenants are complied with and that submissions relating to annual and management accounts are completed within the timescales indicated in individual facility agreements.

15 AUTHORISED SIGNATORIES The Scottish Government scheme work forms

- 15.1 The following signatories are authorised to make certification within scheme administration for development and finance purposes within the Group
- 15.2 For all Scottish Government and Local Authority documentation the following officers:

Executive Director of Finance
Executive Director of Operations
Head of Investment & Sustainability
Development Manager
Head of Finance

- 15.3 All authorised signatories for the Scottish Government and equivalent Local Authority forms must be approved by Caledonia HA's Governing Body.

Other

- 15.4 Directors have authority to sign returns to the Scottish Government, the National Statistical Office and other similar statutory bodies unless that body requires otherwise.

16 DISPOSALS - LAND

- 16.1 All disposals of interests in land must be made in accordance with the Group disposals strategy, comply with procedures laid down by the Scottish Housing Regulator and be authorised by the Governing Body except as set out in this section.

Minor disposals of land up to £20,000 can be authorised by the EMT.

Disposals between £20,000 and £120,000 must be authorised by the Governing Body.

Disposals of land in excess of £120,000 must be authorised by the Governing Body and the Scottish Housing Regulator must be notified as soon as reasonably practicable. Governing Body minutes, reports and valuations to be included in the notification

Granting Standard Security over social housing assets for any amount must be authorised by the Governing Body and the Scottish Housing Regulator must be notified as soon as reasonably practicable. Governing Body minutes, reports and valuations to be included in the notification.

Disposals of land at existing properties in relation to wayleaves for statutory authorities and other services providers must be authorised by the Asset Manager, Head of Investment & Sustainability or Executive Director of Operations.

Disposals of land during new housing developments in relation to wayleaves for statutory authorities and other services providers must be authorised by the Head of Investment & Sustainability, Development Manager or Executive Director of Operations

Disposals - Other than Land or Property

16.2 Other assets should be disposed of as follows:

The Management Board is required to approve the disposal of land and properties that is greater than £20,000 and less than £120,000. The Board are required to approve and notify the Scottish Housing Regulator of disposals greater than £120,000.

A Director has the authority to dispose of other assets that are less than £10,000, the Executive Management Team have approval to dispose of assets between £10,000 and £20,000 and the Management Board are required to approve the disposals of assets in excess of £20,000. All disposal prices have to demonstrate open market value.

16.3 Under no circumstances may a Director approve the disposal of an asset to themselves. If the disposal is to the Chief Executive, this should be approved by the Executive Director of People and Governance. If the disposal is to any Director this should be approved by the Chief Executive

16.4 In all circumstances, where assets are disposed of to staff or governing body members, the staff/governing body member concerned must pay a fair estimate of the market price to the organisation.

Recording Disposals

16.5 The Group will maintain a Register of Disposals in a form appropriate to ensure compliance with Scottish Housing Regulator requirements, and will make this register available on request for inspection by SHR.

17. Compliance Statement

It is important that all members of staff, in carrying out their duties for the Group, do so in accordance with the Group's policy framework. Our policy framework ensures we comply with laws and regulation, while giving guidance to inform operations and decision-making. Our policies have been designed to be clear and easy to understand and are available on our website and intranet. If any member of staff is unclear as to their responsibilities under this policy, then they should refer to their line manager and / or the policy author for further guidance. A failure to comply with Group policies can have serious consequences for the Group. Should an employee become concerned about serious non-compliance with the policy, they should speak to their line manager or refer to the guidance set out in the Group Whistleblowing policy.