

Pembrokeshire County Council
Cyngor Sir Penfro



Financial Regulations

November 2018

FINANCIAL REGULATIONS

CONTENTS

		Pages
1.0	Introduction	
1.1	What are Financial Regulations?	4
1.2	Why are they important?	4-5
1.3	Who do Financial Regulations apply to?	5
1.4	Who is responsible for ensuring that they are applied?	5
1.5	Suspension of Financial Regulations	5
2.0	Financial Management – General Roles and Responsibilities	
2.1	The role of Members	6
2.2	The role of the Chief Finance Officer	6-9
2.3	The role of Directors	9-10
3.0	Financial Planning	
3.1	Strategic Planning	11-12
3.2	Budget Preparation	12-13
3.3	Budget Approval	13
3.4	Budget Transfers/Virements	13
3.5	Budget Monitoring and the Control of Income and Expenditure	13-14
3.6	Reporting at Year End (Statement of Accounts)	14-15
3.7	Use of Reserves	15
4.0	Business Risk Management and Control of Resources	
4.1	Business Risk Management	16
4.2	Internal Control	16-17
4.3	Insurance	17-18
4.4	Internal Audit and External Audit	18-19
4.5	Preventing Fraud and Corruption	20
4.6	Use of, Recording and Disposal of Assets	20-22
4.7	Treasury Management	22-24
4.8	Banking	24-25
4.9	Income Collection	25-26
4.10	Anti-Money Laundering	27
4.11	External Funding	27
4.12	Debt Collection	28
4.13	Voluntary Funds and Trust Funds	28

		Pages
4.14	Purchase Cards	28
4.15	Advance Accounts	29
4.16	Employees	29-30
5.0	Financial Systems and Procedures	
5.1	General	31
5.2	Contracts and Purchasing	31-34
5.3	Officers and Members Allowances	34
5.4	Taxation	35
5.5	Housing Revenue Account	35
6.0	Partnerships	36
7.0	Clarification and Contacts	37

1.0 Introduction

1.1 What are Financial Regulations?

1.1.1 The Chief Finance Officer is responsible for:

- (a) preparing detailed Financial Regulations which provide the framework for the proper administration of the Council's financial affairs;
- (b) issuing advice and guidance to underpin the Financial Regulations which Members, Officers and others acting on behalf of the Council are required to follow.

1.1.2 The regulations identify the financial responsibilities of the Full Council, the Cabinet and Officers.

1.1.3 To avoid the need for regular amendment due to changes in post titles, generic terms are included for Officers as follows:

- The term "Directors" refers to the Council's Chief Executive and the Directors.
- The term "Cabinet" refers to the Cabinet and Leader of the Council.
- The term "Chief Finance Officer" is the Council's Statutory Section 151 Officer and refers to the Director of Resources (Deputy Section 151 Officer is the Head of Finance & Business Services).
- The term "Head of Internal Audit" refers to the Governance, Assurance and Information Manager.

1.2 Why are they important?

1.2.1 To conduct its business effectively, the Council needs to ensure that sound financial management arrangements are in place and that they are strictly adhered to in practice. Part of this process is the establishment of Financial Regulations which set out the financial responsibilities of the Council.

1.2.2 Good, sound financial management is a key element of the Council's Corporate Governance framework, which helps to ensure that the Council is doing the right things, in the right way, for the right people, in a timely, inclusive, open, honest and accountable manner.

1.2.3 Good financial management secures value for money, controls spending, ensures probity of transactions and allows decisions to be informed by accurate accounting information, substantiating the effective use of public money.

1.2.4 Financial Regulations should not be seen in isolation, but rather as part of the overall regulatory framework of the Council as set out in the Constitution.

1.3 Who do Financial Regulations apply to?

1.3.1 Financial Regulations apply to every Member and Officer of the Council and anyone acting on its behalf. Members and Officers have a general responsibility for taking reasonable action to provide for the security and use of the resources and assets under their control, and for ensuring that the use of such resources and assets is legal, is consistent with Council policies and priorities, is properly authorised and achieves value for money.

1.3.2 Separate financial procedures have been incorporated into the Council's Financial Regulations for Schools and relate to those matters where decisions have been delegated to school governing bodies.

1.3.3 These Financial Regulations will apply in relation to any partnership for which the Council is the accountable body, unless the Council expressly agrees otherwise.

1.3.4 Failure to observe Financial Regulations may result in action under the Council's disciplinary procedures.

1.4 Who is responsible for ensuring that they are applied?

1.4.1 Directors, Heads of Service and Individual Cabinet Members are ultimately responsible to the Council for ensuring that Financial Regulations are applied and observed by staff and contractors providing services on the Council's behalf, and for reporting to the Chief Finance Officer any known or suspected breaches.

1.5 Suspension of Financial Regulations

1.5.1 Where any Director considers that complying with Financial Regulations in a particular situation might conflict with the achievement of value for money or the best interests of the Council, he/she will raise the issue with the Chief Finance Officer who will, if he considers necessary and appropriate, seek formal approval from the Cabinet for a specific exception to the regulations.

2.0 Financial Management – General Roles and Responsibilities

2.1 The Role of Members

The Council has a duty towards its Council Tax payers with regard to financial decisions and their consequences. Full Council is responsible for approving the Budget and Policy Framework within which the Cabinet operates having regard to the Chief Finance Officer's comments in his Local Government Act 2003 section 25 report on the robustness of estimates and the adequacy of reserves. The budget setting process includes Full Council approval of Prudential Indicators as required by the CIPFA Prudential Code for Capital Finance in Local Authorities. Full Council is also responsible for approving and monitoring compliance with the overall framework of accountability and control.

The following have specific financial roles and responsibilities as set out in Parts 2 and 3 of the Constitution:

- The Council
- The Cabinet
- Overview and Scrutiny Committees
- Audit Committee

2.2 The Role of the Chief Finance Officer

2.2.1 The role of the Chief Finance Officer is set out in Part 2, Section 10 of the Constitution.

2.2.2 The Chief Finance Officer is accountable to the Chief Executive and the Council and has statutory duties that provide overall responsibility for the financial administration and stewardship of the Council. This statutory responsibility cannot be overridden. These statutory duties arise from:

- (a) Section 151 of the Local Government Act 1972;
- (b) The Local Government Finance Act 1988;
- (c) The Local Government and Housing Act 1989 / Housing (Wales) Act 2014;
- (d) Local Government Act 2003;
- (e) The Accounts and Audit (Wales) Regulations 2014 (as amended).

2.2.3 The Chief Finance Officer is the Council's professional adviser on financial matters and is responsible for:

- (a) the proper administration of the Council's financial affairs;
- (b) maintaining a continuous review of the Financial Regulations and submitting any additions or changes as necessary to the Audit Committee for approval;
- (c) annually reviewing, updating and monitoring compliance with the Financial Control Procedures;
- (d) advising on the corporate financial position and on the key financial controls necessary to secure sound financial management;
- (e) providing financial information and advice to the Corporate Management Team, the Cabinet and the Council on all aspects of its activity including the presentation of appropriate financial options as necessary;
- (f) providing training for Members and Officers on Financial Regulations and Financial Control Procedures;
- (g) determining accounting policies and ensuring that they are applied consistently;
- (h) determining accounting procedures and records of the Council;
- (i) preparing and monitoring the revenue budget, capital programme and Medium Term Financial Plan;
- (j) ensuring the provision of an effective Internal Audit Function;
- (k) ensuring the provision of an effective Treasury Management Function;
- (l) advising on risk management;
- (m) ensuring the Council complies with the CIPFA Prudential Code for Capital Finance in Local Authorities;
- (n) ensuring that Council spending plans and council tax calculations, identified in the Medium Term Financial Plan, are based upon robust estimates;
- (o) ensuring that the level of Council reserves is adequate to meet the known financial risks facing the Council over the medium term;

- (p) ensuring that the annual Statement of Accounts is prepared in accordance with the latest Code of Practice on Local Authority Accounting in the UK and the Service Reporting Code of Practice (SeRCOP) to ensure consistent financial reporting below the Statement of Accounts level;
- (q) ensuring that financial information is available to enable accurate and timely monitoring and reporting of comparisons of national and local financial performance indicators;
- (r) ensuring that proper professional practices, standards and ethics are adhered to;
- (s) acting as head of profession in relation to the standards, performance and development of finance staff including the training and professional development of all staff employed in posts designated as requiring a qualified accountant, accounting technician, or auditor, wherever located;
- (t) the appointment of all finance staff and will be consulted on any proposal to create or delete a post requiring such a qualification for appointment;
- (u) The Chief Finance Officer will, at his discretion, report to the Cabinet and/or the Audit Committee any breach or material case of non-compliance with these Financial Regulations. Where appropriate the Chief Executive or Chief Finance Officer may consult with the Head of Human Resources regarding any disciplinary action necessitated by the breach or non-compliance.

2.2.4 Section 114 of the Local Government Finance Act 1988 requires the Chief Finance Officer to report to Full Council and to the External Auditors if the Council or one of its Officers:

- (a) has made, or is about to make a decision which involves incurring expenditure which is unlawful;
- (b) has taken or is about to take, unlawful action which has resulted or would result in a loss or deficiency to the Council;
- (c) is about to make an unlawful entry in the Council's accounts.

For clarity, Cipfa also use the term "unbalanced budget" under Section 114.

2.2.5 Section 114 of the Local Government Finance Act 1988 also requires:

- (a) the Chief Finance Officer to nominate a properly qualified member of staff to deputise should he or she be unable to perform the duties under section 114 personally;
- (b) the Council to provide the Chief Finance Officer with sufficient staff, accommodation and other resources, including legal advice where necessary, to carry out the duties under section 114, as determined by the Chief Finance Officer.

2.2.6 The Chief Finance Officer:

- (a) is required to approve all financial procedures, records, systems and accounts throughout the Council which are necessary to ensure that the tasks defined in these procedures are properly carried out. The Council will also ensure that the Chief Finance Officer is consulted and given the opportunity to advise upon all financial management arrangements to ensure provision of detailed advice and guidance on financial systems and procedures necessary to ensure a satisfactory standard of accuracy, reliability, probity and regularity;
- (b) will be given access to any information as is necessary to comply with his statutory duties and with the requirements and instructions of the Council;
- (c) will be entitled to attend and report on financial matters directly to the Council, the Cabinet, and any Committees or working groups the Council may establish and to the Corporate Management Team;
- (d) will be sent prior notice of all meetings of the Cabinet and all reports for Individual Cabinet Members under the Individual Cabinet Member delegation procedure, the Council, all Committees/Sub-Committees/working groups together with full agendas and reports and will have authority to attend all meetings and take part in the discussion if he so desires.

2.3 The Role of Directors

2.3.1 Directors are each accountable to the Council for the financial management and administration of those services and activities allocated to them in accordance with Council policy.

2.3.2 Directors are responsible for:

- (a) ensuring that adequate and effective systems of internal control are operated to ensure the accuracy, legitimacy and proper processing of transactions and the management of activities, having regard to advice and guidance from the Chief Finance Officer;
- (b) ensuring that Cabinet Members are advised of the financial implications of all proposals and that the financial implications have been agreed by the Chief Finance Officer;
- (c) consulting with the Chief Finance Officer in seeking approval regarding any matters which may affect the Council's finances materially, before any commitments are incurred;
- (d) consulting with each other on any issue with corporate financial implications before submitting policy options or recommendations to Members.

3.0 Financial Planning

3.1 Strategic Planning

3.1.1 The Full Council is responsible for approving the Council's Budget and Policy Framework (Part 2, Section 3 of the Constitution).

3.1.2 The preparation of the Medium Term Financial Plan is part of the Budget and Policy Framework of the Council and aims to ensure that the Council's spending plans are prudent, affordable, sustainable and reflect Council priorities.

3.1.3 In terms of strategic financial planning, the key documents for consideration are:

- (a) the Programme for the Administration;
- (b) the Council's Corporate Plan (including Well-being Objectives);
- (c) the Council's Transformation Programme;
- (d) the Budget Strategy;
- (e) the Capital Strategy;
- (f) the Treasury Management Strategy and Investment Strategy;
- (g) the Strategic Asset Management Plan;
- (h) the Business Risk Management Strategy and Corporate Risk Register;
- (i) the Workforce Development Plan;
- (j) the Council's Performance Management Framework.

3.1.4 The Full Council is responsible for approving procedures for agreeing variations to approved budgets, plans and strategies forming the Budget and Policy Framework and for determining the circumstances in which a decision will be deemed to be contrary to or not wholly in accordance with the Budget and Policy Framework.

3.1.5 The Monitoring Officer and Head of Legal and Democratic Services will, in conjunction with the Chief Finance Officer, advise whether decisions of the Cabinet are in accordance with the Budget and Policy Framework.

3.1.6 Directors are responsible for the preparation and monitoring of service improvement plans within their Directorates in accordance with the corporate performance management framework. Service improvement plans should align with the Programme for the Administration and the Council's Corporate Plan (including Well-being Objectives) and be consistent with and based upon the budget allocated by the Council to the service.

3.2 Budget Preparation

3.2.1 The Cabinet, in consultation with the Chief Finance Officer is responsible for approving the Budget Strategy.

3.2.2 The Budget Strategy will take account of:

- (a) the Programme for the Administration and the Council's Corporate Plan (including Well-being Objectives);
- (b) workforce inflation, non-workforce inflation, demographic and legislative pressures;
- (c) funding from Welsh Government (Aggregate External Finance and specific grant) and other sources;
- (d) council tax increases;
- (e) the level of reserves and the general fund working balance;
- (f) the affordability and sustainability of service provision;
- (g) the affordability, sustainability and prudence of capital investment plans;
- (h) legal requirements and other relevant government requirements and guidelines;
- (i) value for money;
- (j) other internal policy documents;
- (k) cross-cutting issues (where relevant).

3.2.3 The Chief Finance Officer is responsible for:

- (a) developing and maintaining a budget and resource allocation process that ensures consideration of the Policy Framework;
- (b) ensuring that a detailed revenue budget and a strategic plan up to a four year period (Medium Term Financial Plan) are prepared on an annual basis, for consideration by the Cabinet before submission to Full Council for approval;

- (c) ensuring that a detailed capital programme and an indicative capital programme for a further two year period is prepared on an annual basis, for consideration by the Cabinet before submission to the Full Council for approval.

3.2.4 It is the responsibility of the Chief Finance Officer to advise the Cabinet and/or the Full Council on prudent levels of working balances and reserves for the Council.

3.2.5 Directors are responsible for ensuring that the Policy Framework and service improvement plans within their Directorate are deliverable within the approved budget allocation.

3.3 Budget Approval

3.3.1 The Budget approval process is set out in Part 2 Section 3 of the Constitution.

3.3.2 Provision of an item in the approved Budget (revenue and capital) confers authority on the Cabinet/Directors to incur such expenditure during the financial year to which the budget relates.

3.3.3 Authorisation of capital schemes will be in accordance with decisions of Cabinet or under the Individual Cabinet Member Delegations – “Authorise schemes within the agreed capital programme or for which capital provision is available within a delegated budget if deemed affordable by the Section 151 Officer, subject to paragraph 5.2.2 below”.

3.4 Budget Transfers/Virements

3.4.1 Budget transfers/virements will be in accordance with the Individual Cabinet Member Delegations:

(a) Up to £50,000 – Directors approval required;

(b) Exceeding £50,000 to £1,000,000 – Individual Cabinet Members approval required;

(c) Exceeding £1,000,000 – Cabinet approval required.

3.4.2 Authorisation of the Chief Finance Officer is required to release funds from reserves in accordance with the Strategy for Holding and Utilising Reserves.

3.4.3 A capital budget cannot be transferred to a revenue budget.

3.5 Budget Monitoring and the Control of Income and Expenditure

3.5.1 The Chief Finance Officer (and Head of Human Resources in regard to payroll, pensions and personal taxation) is responsible for:

- (a) developing an effective framework of budget management and control;
- (b) providing appropriate financial information to enable budgets to be monitored effectively;
- (c) reporting to Directors, the Cabinet (and other Committees as appropriate) on the overall Council budget monitoring position on at least a half-yearly basis;
- (d) all payments to employees, Members and creditors;
- (e) maintaining the Council's tax records;
- (f) advising Directors on all taxation issues that affect the Council;
- (g) ensuring that all funding notified by external bodies is received and properly recorded in the Council's accounts;
- (h) approving arrangements for the collection of income due to the Council;
- (i) approving banking, borrowing and other credit requirements, e.g. leasing;
- (j) approving the write off of bad debts;

3.5.2 Contracts for the supply of goods and services or the undertaking of works will be in accordance with the Contract Procedure Rules and Individual Cabinet Member Delegations.

3.5.3 Separate financial procedures for schools have been incorporated into the Council's Financial Regulations for Schools and relate to those matters where decisions have been delegated to school governing bodies.

3.5.4 It is the responsibility of Directors to:

- (a) control income and expenditure within their Directorate and service areas and only incur expenditure for which there is budgetary provision;
- (b) monitor performance in conjunction with the budget taking account of financial information provided by the Chief Finance Officer;
- (c) report on budget variances (expenditure and income) within their own areas to the Chief Finance Officer;

- (d) take any corrective action necessary to avoid exceeding their budget allocation and alert the Chief Finance Officer accordingly.

3.6 Reporting at Year End (Statement of Accounts)

3.6.1 The Chief Finance Officer is responsible for:

- (a) providing the Cabinet with an annual budget outturn statement;
- (b) publishing an annual timetable for the closure, audit and approval of the accounts;
- (c) ensuring that the Council's annual Statement of Accounts is prepared in accordance with the Code of Practice on Local Authority Accounting in the United Kingdom (CIPFA/LASAAC), the Accounts and Audit (Wales) Regulations 2014 (as amended) and any other relevant guidelines.
- (d) submitting the draft Statement of Accounts to the External Auditor for audit, the Audit Committee for review and Council for approval, in accordance with the timetable.

3.6.2 It is the responsibility of Directors to ensure that arrangements are put in place each year to deliver the Council's timetable.

3.7 Use of Reserves

3.7.1 The Chief Finance Officer is responsible for advising the Cabinet and/or the Full Council on levels of reserves for the Council. The advice will be based upon an annual risk assessment of the prudent levels of reserves the Council should maintain.

3.7.2 The Chief Finance Officer will manage the reserves in accordance with the Strategy for Holding and Utilising Reserves.

4.0 Business Risk Management and Control of Resources

4.1 Business Risk Management

- 4.1.1 It is essential that robust, integrated systems are developed and maintained for identifying, evaluating, managing and reviewing all significant strategic and operational business risks to the achievement of the Council's Well-being objectives. This should include the proactive participation of all those associated with planning and delivering services.
- 4.1.2 The Corporate Risk Management Group is responsible for reviewing strategic risks and reporting progress on their management to the Corporate Management Team, the Audit Committee and the Cabinet.
- 4.1.3 The Cabinet are responsible for formally approving the Council's Corporate Risk Register on an annual basis.
- 4.1.4 The Audit Committee is responsible for approving the Council's Business Risk Management Strategy and for reviewing the effectiveness of the Council's business risk management arrangements.
- 4.1.5 The Chief Finance Officer is the Council's nominated Business Risk Management Champion, supported by the Members Business Risk Management Champion.
- 4.1.6 The Chief Finance Officer/Head of Internal Audit are responsible for preparing the Council's Business Risk Management Strategy and for promoting and embedding it throughout the Council and for advising the Cabinet on risk mitigation for significant risks where appropriate.
- 4.1.7 It is the responsibility of Directors to ensure there are regular reviews of business risks within their areas of responsibility having regard to advice from the Chief Finance Officer/Head of Internal Audit and other specialist Officers (e.g. Legal and Health & Safety).
- 4.1.8 It is the responsibility of Directors and Heads of Service to ensure compliance with the Business Risk Management Strategy and Guidelines.

4.2 Internal Control

- 4.2.1 Internal control refers to the systems of control devised by management to help ensure the Council's Well-being objectives are achieved in a manner that promotes economic, efficient and effective use of resources and that the Council's assets and interests are safeguarded.

- 4.2.2 Effective internal control systems ensure that the Council secures probity and legitimacy of transactions, and prevents and detects fraud, misuse of assets and funds, and irregularity.
- 4.2.3 The Head of Internal Audit is responsible for advising on effective systems of internal control. Effective systems of internal control should ensure compliance with all applicable statutes and regulations, and other relevant statements of best practice. They should also ensure that public funds are properly safeguarded and used economically, efficiently and in accordance with the statutory and other authorities that govern their use.
- 4.2.4 It is the responsibility of Directors to establish sound arrangements for planning, appraising, authorising and controlling their operations in order to achieve continuous improvement, value for money, effective use of resources and achieving their financial performance targets.
- 4.2.5 The Council is required to provide a Statement on Internal Control (Annual Governance Statement) in accordance with the Accounts and Audit (Wales) Regulations 2014 (as amended). As part of this statement, the Chief Executive and the Leader of the Council are required to comment on the effectiveness of the entire internal control environment within the Council as a key indicator of good governance.
- 4.2.6 Directors and Statutory Officers are required to give annual assurance that sound governance arrangements exist within their Directorates. Financial Control Procedures have been established to bring to the attention of those with responsibility for budgetary control the issues they need to consider to ensure the required governance arrangements are in place.

4.3 Insurance

- 4.3.1 Insurance provision is a way of managing risk.
- 4.3.2 The Chief Finance Officer is responsible for:
- (a) effecting insurance cover falling within the Policy Framework approved by the Council and dealing with all claims in consultation with other Directors where necessary;
 - (b) operating an internal insurance account(s) for risks not covered by external insurance policies and is authorised to charge the various Council Service budgets with the cost of contributions to this account;

- (c) reviewing, at least annually, all insurances in consultation with Directors where necessary.

4.3.3 It is the responsibility of Directors to:

- (a) advise the Chief Finance Officer of all new risks, properties, vehicles or potential liabilities for which insurance may be required; and of any changes affecting existing risks or insurance cover required;
- (b) notify the Chief Finance Officer in writing and without delay of any loss, liability or damage or any event likely to lead to a claim, and will provide such information and explanations required by the Chief Finance Officer or the Council's insurers;
- (c) consult with the Head of Legal and Democratic Services on the terms of any indemnity which they are requested to give on behalf of the Council;
- (d) ensure that employees, or anyone covered by the Council's insurances, do not admit liability or make any offer to pay compensation that may prejudice the assessment of liability in respect of any insurance claim;
- (e) keep suitable records and ensure inspections of any asset are carried out within any period prescribed by legislation or insurers.

4.3.4 Any monies due from the insurers will be paid to the Chief Finance Officer.

4.4 Internal Audit and External Audit

4.4.1 The requirement for an internal audit function for local authorities is implied by section 151 of the Local Government Act 1972, which requires that authorities "make arrangements for the proper administration of their financial affairs". Reliance on Internal Audit is fundamental to this responsibility. The Accounts and Audit (Wales) Regulations 2014 require that a "relevant body shall maintain an adequate and effective system of internal audit of their accounting records and control systems and review its effectiveness on an annual basis".

4.4.2 The Chief Finance Officer is responsible for:

- (a) ensuring that the Council has appropriate arrangements in place to maintain an adequate and effective internal audit function;
- (b) maintaining a continuous internal audit and, so far as he/she may deem reasonable, arrange for the examination and audit of accounting, financial and other operations of the Council.

- 4.4.3 The strategy and terms of reference for Internal Audit are detailed in the Council's Internal Audit Charter which is reviewed and approved by the Audit Committee.
- 4.4.4 The internal audit function is governed by the Public Sector Internal Audit Standards and the Head of Internal Audit is required to report annually on conformance.
- 4.4.5 The Head of Internal Audit is required to provide an Annual Assurance Statement on the effectiveness of the Council's internal control, governance, risk management and financial management arrangements, in accordance with the Public Sector Internal Audit Standards. This is a key element of the evidence required to support the Annual Governance Statement.
- 4.4.6 The Chief Finance Officer or his internal audit staff will have authority to:
- (a) Enter at all reasonable times any Council premises or land;
 - (b) Have access to all records, information systems, documents and correspondence relating to any financial or other transactions of the Council;
 - (c) Require and receive such information and explanations as are necessary concerning any matter under examination within a reasonable period (normally not more than 28 days);
 - (d) Require any employee of the Council to produce cash, stores or any other Council property under his control.

This authority should be extended to the Council's partnerships at the discretion of the Chief Finance Officer.

- 4.4.7 The Auditor General for Wales is responsible for appointing external auditors to each Local Authority. The basic duties of the external auditor are governed by the Public Audit (Wales) Act 2004. They are also required to follow the Code of Audit Practice. Their duties include reviewing the work of Internal Audit in order to place reliance on it.
- 4.4.8 The Council may, from time to time, be subject to audit, inspection or investigation by external bodies such as HMRC, who have statutory rights of access.
- 4.4.9 The Chief Finance Officer or relevant Director are responsible for reporting to the Audit Committee and the Cabinet, where appropriate, the findings of these audits, inspections or investigations and taking relevant action to implement recommendations and action required.

4.5 Preventing Fraud and Corruption

- 4.5.1 The Council has a zero tolerance approach to fraud, corruption and bribery in the administration of its responsibilities.
- 4.5.2 The Chief Finance Officer/Head of Internal Audit are responsible for the development, maintenance and review of a Counter Fraud, Corruption and Bribery Policy Statement & Strategy.
- 4.5.3 It is the responsibility of Directors to promote the Counter Fraud, Corruption and Bribery Policy Statement & Strategy within their Directorates and to ensure that all suspected frauds or irregularities are reported to the Chief Finance Officer and/or the Head of Internal Audit immediately they become aware.
- 4.5.4 The Chief Finance Officer/Head of Internal Audit will take whatever steps are considered necessary to investigate and report on the matter in line with the Counter Fraud, Corruption and Bribery Policy Statement & Strategy. Any referral to the Police to be undertaken by the Chief Finance Officer/Head of Internal Audit in consultation with the Chief Executive. Directors are responsible for taking any appropriate action to prevent further loss and to secure records and documentation against removal or alteration.

4.6 Use of, Recording and Disposal of Assets

- 4.6.1 The Director of Community Services is responsible for:
 - (a) preparing the Strategic Asset Management Plan and for promoting and embedding it throughout the Council;
 - (b) maintaining a continuous review of the Strategic Asset Management Plan and submitting any additions or changes as necessary to the Cabinet for approval.
- 4.6.2 The Strategic Asset Management Group is responsible for reviewing delivery of the Strategic Asset Management Plan and reporting on specific matters arising to the Cabinet.
- 4.6.3 Council assets include land, premises, furniture, vehicles, plant and equipment, computer systems, stocks and stores, money and investments, data and information.
- 4.6.4 Directors are responsible for ensuring that adequate and effective arrangements are in place for the recording, safeguarding, care and custody of all assets within their Directorates and ensuring that assets are acquired and disposed of in accordance with the Contract Procedure Rules or any procedures issued by the Chief Finance Officer.

- 4.6.5 The acquisition or disposal of land or premises, in consultation with the Leader, will be in accordance with the Individual Cabinet Member Delegations:
- (a) Up to £150,000 – Directors approval required;
 - (b) Exceeding £150,000 to £1,000,000 – Individual Cabinet Members approval required;
 - (c) Exceeding £1,000,000 – Cabinet approval required.
- 4.6.6 The Director of Community Services is responsible for ensuring that the sale of income producing property is contingent upon a premium being achieved on the sale value, appropriate overage clauses being put in place and the capital receipt being earmarked for the future purchase of income producing property.
- 4.6.7 The Director of Community Services/Director of Resources are responsible for ensuring that effective due diligence is undertaken prior to the purchase of any investment property to ensure any future risks to the Council are identified and mitigated, and financial returns are maximised.
- 4.6.8 All long-term Council assets with a value exceeding £10,000 or over must be recorded on the Fixed Asset Register maintained by the Director of Community Services/Chief Finance Officer.
- 4.6.9 Directors must supply information immediately to the Director of Community Services/Chief Finance Officer in respect of all acquisitions, disposals and changes of use of assets and confirm annually that the Fixed Asset Register reflects a true record of the assets under their control.
- 4.6.10 The Director of Community Services will take appropriate action to ensure that land, premises and other relevant assets of the Council are valued appropriately and in accordance with accounting requirements laid down in the Code of Practice on Local Authority Accounting in the UK (CIPFA/LASAAC) as agreed with the Chief Finance Officer and that the values are promptly recorded in the Fixed Asset Register.
- 4.6.11 In addition to the above, the Director of Community Services will maintain a terrier of all properties (including land and premises) owned, leased and licenced by and to the Council. The terrier should include full details regarding acquisition, location, purpose held and other aspects of ownership. Directors must ensure that the Director of Community Services is advised accordingly where they exercise control and where land and premises become surplus to requirements.
- 4.6.12 The Director of Community Services will ensure the reconciliation of information held in the Fixed Asset Register and the terrier of properties.

- 4.6.13 The Director of Community Services will have custody of all title deeds under secure arrangements.
- 4.6.14 Directors will ensure that land or premises for which they are responsible are properly used for the purpose for which they are held and that there is an adequate programme for annual inspection. Where security is deemed defective, the Director of Community Services will be consulted. All lettings should be subject to an appropriate agreement, which addresses amongst other things responsibility and indemnification of the Council.
- 4.6.15 Where the Council holds or retains articles, equipment or other property on behalf of a 'client' (for example in residential homes, goods seized by Trading Standards or Bailiffs) these items must be properly recorded as to the identity of the item and its owner and held as securely as is reasonably possible. Its disposal/return will likewise be recorded, with the signature of the client or their representative where applicable. The Council should not normally hold or retain items on behalf of others where it does not have a duty or formal approval from the relevant Director to do so. In all cases, insurance and liability arrangements must be determined at the outset.
- 4.6.16 Other than where a Council policy would allow, Directors are responsible for ensuring that no Authority assets are subject to personal use by an employee or other. Where there are exceptional circumstances, any use must be properly authorised by the Director and recorded. Specific guidance for IT equipment is included in the IT Security and Email/Internet Policy.
- 4.6.17 Keys to doors, safes and similar receptacles are to be carried by the person responsible. Any loss of such keys must be reported to the Director of Community Services immediately and where necessary the Chief Finance Officer.

4.7 Treasury Management

- 4.7.1 The Council is required to take account of statutory backed guidance, including The Code of Practice on Treasury Management in the Public Services (Treasury Code) and guidance notes published by the Chartered Institute of Public Finance and Accountancy (CIPFA), and the Prudential Code (CIPFA) when putting in place policies and procedures for dealing with Treasury Management.

- 4.7.2 The Chief Finance Officer is responsible for preparing on an annual basis for consideration by the Cabinet before submission to Full Council for approval:
- (a) a Treasury Management Strategy including the Treasury Management Policy Statement, Treasury Management Resolutions, the Policy of Borrowing in Advance of Need, the Minimum Revenue Provision Policy, the Treasury Limits, the Prudential Indicators and Borrowing Requirements;
 - (b) an Investment Strategy.
- 4.7.3 The Chief Finance Officer is responsible for the execution and administration of all treasury management decisions, including decisions on borrowing, investment and financing, in accordance with the Council's Treasury Management Strategy and Investment Strategy.
- 4.7.4 The Council has delegated responsibility for the implementation and monitoring of its Treasury Management and Investment activities to the Cabinet, who will receive at least one monitoring report from the Chief Finance Officer during the year and an annual outturn report.
- 4.7.5 The Council has delegated responsibility for reviewing, analysing and monitoring delivery of the Treasury Management Strategy, the Investment Strategy and related policies and practices to the Treasury Management and Capital Panel, which includes the Cabinet Member for Finance and other Members as appropriate. The Chief Finance Officer is responsible for making reports to the Cabinet on behalf of the Treasury Management and Capital Panel.
- 4.7.6 The Chief Finance Officer is responsible for procuring the services of external treasury management or investment advisors.
- 4.7.7 All money in the hands of the Council will be aggregated for the purposes of treasury management and will be under the control of the Chief Finance Officer, who will maintain appropriate records of all treasury management and investment transactions.
- 4.7.8 All borrowing or investment are to be effected in the name of the Council.

4.7.9 The Director of Resources/Head of Legal & Democratic Services are responsible for ensuring that the effective due diligence below is undertaken on any applications for loans from third parties, prior to consideration for approval by the Cabinet:

- (a) Financial – Robust business case in place which is financially viable and would enable a loan to be repaid by the loanee, the Council has the necessary funds in place to grant the loan, commercial rate of interest to be determined and loan to be treated as non-treasury investment;
- (b) Customer – “Know your Customer” checks to verify identity and status of all associated parties, eligibility, and assessment of potential fraud and money-laundering risks;
- (c) Legal – Statutory powers for granting the loan identified, compliance with State Aid requirements and formal loan agreement drafted (signed after approval);
- (d) Security – Adequate security is in place, e.g. charge on property, to safeguard the loan in the event of default;
- (e) Full Cost Recovery – All costs incurred by the Council (financial, legal and property etc.) in considering, granting and managing the loan will be recovered.

4.8 Banking

4.8.1 The Chief Finance Officer is responsible for all arrangements concerning banking services, including the opening, closing and operation of the Council’s bank accounts.

4.8.2 The Chief Finance Officer is responsible for the reconciliation of the Council’s bank accounts with the Council’s financial accounts.

4.8.3 Directors are responsible for ensuring that all banking arrangements determined by the Chief Finance Officer are observed and to advise him of any changes in their Directorates that may require a change in these arrangements.

4.8.4 All bank accounts of the Council must bear its full official title (not initials) and not solely in the name of an individual.

4.8.5 The Chief Finance Officer is responsible for determining those officers authorised to sign individual cheques or approve transaction instructions on the Council’s bank accounts.

4.8.6 Except where other specific arrangements have been approved by the Chief Finance Officer, all cheques will be ordered only on the authority of the Chief Finance Officer who will make proper arrangements for their safe custody.

4.8.7 Bank accounts maintained by Schools under the Education Reform Act 1988 will comply with the Council's Financial Regulations for Schools.

4.9 Income Collection

4.9.1 The Chief Finance Officer is responsible for approving all methods of income collection, records and systems.

4.9.2 Directors are responsible for:

- (a) ensuring that all income due to the Council is promptly recorded in a form approved by the Chief Finance Officer and all accounts for income due to the Council are rendered by arrangements approved by the Chief Finance Officer;
- (b) ensuring the timely billing/invoicing of all income due to the Council;
- (c) consulting with the Chief Finance Officer on the proposed amendment, cessation or introduction of an income stream (other than a prescribed legal fee);
- (d) ensuring all income is held securely and within insurance limits;
- (e) ensuring compliance with income and banking arrangements specified by the Chief Finance Officer;
- (f) ensuring fees and charges are based on full cost recovery and reviewed at least annually, in consultation with the Chief Finance Officer;
- (g) the approval of fees and charges in accordance with the Individual Cabinet Member Delegations – "Determination of increases in fees and charges in excess of inflation, as long as such charges are within the Cabinet's overall charging policy to ensure consistency, do not conflict with, or compromise any other existing or proposed policy or portfolio initiative, are within approved budget lawful and financially sound and do not include any profit element";
- (h) ensuring that all financial stationery is appropriately controlled and accounted for;
- (i) the separation of duties between officers calculating and recording income owed to the Council and the collection of those sums;
- (j) avoiding the uneconomic use of the sundry debtors system, sums less than £50 should be collected in advance or at the time of receipt of the service;

- (k) ensuring that personal cheques are not cashed out of money held on behalf of the Council nor should any officer borrow money from cash income collection.
- 4.9.3 Where cash tills/electronic registry systems are operating, all income should be registered immediately. Proper security as regards keys or passwords should be applied. Till/system readings should be taken at the appropriate times and closedown/end of day procedures should be documented and applied. Regular unannounced cash ups by management will take place and be recorded.
- 4.9.4 All income received by an officer on behalf of the Council will be recorded in a manner directed by the Chief Finance Officer (including on-line returns) and will without delay or as prescribed be paid to the Chief Finance Officer or as he may direct to the Council's bank or other body entitled thereto. For main collection points, depending on sums collected or other instruction daily banking/deposits would be expected. In all other cases, unless otherwise agreed, a minimum of weekly bankings/deposits would be expected. Additionally:
- (a) all cheques, postal orders and negotiable instruments (e.g. credit notes) should be made payable to Pembrokeshire County Council;
 - (b) cheques not crossed "A/c Payee or similar" payable to a third party and endorsed are not to be accepted except with the authorisation of the Chief Finance Officer;
 - (c) where cash or postal orders have been received, these must be promptly acknowledged by the receiving officer, by way of receipt or other acknowledgement to the payer approved by the Chief Finance Officer;
 - (d) No deduction will be made from income received;
 - (e) Each officer who banks money will complete a paying-in slip quoting a reference for identification purposes;
 - (f) Arrangements should be made in accounting records to identify surpluses (which should be banked) and deficiencies. Where these are regular or serious the Chief Finance Officer/Head of Internal Audit should be notified immediately and appropriate action taken;
 - (g) Transfer of official money between officers will be evidenced by the signature of both officers.
- 4.9.5 Incoming mail should be delivered to a secure, theft proof environment and appropriate procedures adopted for opening, recording, transferring and processing items received.

4.10 Anti-Money Laundering

4.10.1 The Chief Finance Officer is the Council's Money Laundering Reporting Officer and is responsible for the development, maintenance and review of the Anti-Money Laundering Policy.

4.10.2 The Audit Committee are responsible for approving the Council's Anti-Money Laundering Policy.

4.10.3 The Chief Finance Officer is responsible for the implementation and administration of the Council's Anti-Money Laundering Policy.

4.11 External Funding

4.11.1 Directors are responsible for ensuring that any bids/applications for external funding are made in consultation with the Chief Finance Officer and in accordance with the Individual Cabinet Member Delegations:

(a) Up to £100,000 – Directors approval required;

(b) Exceeding £100,000 to £2,000,000 – Individual Cabinet Members approval required subject to financial regulations and any match funding being identified at the time of bidding;

(c) Exceeding £2,000,000 – Cabinet approval required.

4.11.2 The Chief Finance Officer will be responsible for authorising all applications for, and acceptance of, external funding.

4.11.3 Directors must ensure that any project to be funded by external funding does not commence until approval has been obtained and the source of external funding confirmed.

4.11.4 Directors must ensure that full consideration has been given to the lifetime financial commitment of the grant and adequate provision is made to ensure compliance with the terms and conditions to indemnify the Council against future costs, e.g. redundancies, and clawback of grant.

4.11.5 The Chief Finance Officer is responsible for ensuring that all funding notified by external bodies is received and properly recorded in the Council's accounts. Directors are responsible for providing all necessary information to enable this to be achieved.

4.12 Debt Collection

4.12.1 The Chief Finance Officer is responsible for maintaining records of debt and the maintenance and review of a Corporate Debt Recovery Policy.

4.12.2 The Cabinet is responsible for approving the Corporate Debt Recovery Policy.

4.12.3 Directors are responsible for:

- (a) ensuring effective systems are in place to allow sums due to the Council to be easily identified;
- (b) ensuring debtor accounts are raised accurately and promptly and that adequate records are maintained to support the raising of the debt and any recovery action taken;
- (c) assisting in the collection of debt by providing any further information necessary to pursue the debt, as requested by the Chief Finance Officer or the Head of Legal and Democratic Services;

4.12.4 The Chief Finance Officer is responsible for:

- (a) determining the level of bad debt provision;
- (b) approving the write-off of bad debts.

4.13 Voluntary Funds and Trust Funds

4.13.1 The Chief Executive and Chief Finance Officer are responsible for approving the Council's involvement in any voluntary or trust fund. Directors are responsible for approving any employee's involvement in a voluntary or trust fund.

4.13.2 Directors are responsible for ensuring that funds are managed and administered in accordance with any statutory or specific requirement for each fund, and to equivalent standards as those applicable to the Council generally.

4.14 Purchase Cards

4.14.1 The Chief Finance Officer/Head of Procurement will issue guidelines regarding the application process and their controlled use.

4.14.2 Card holders are personally responsible for the security of purchase cards and for ensuring compliance with the guidelines.

4.15 Advance Accounts

- 4.15.1 The Chief Finance Officer will provide such cash floats and imprest accounts to Directors as he considers appropriate.
- 4.15.2 Directors are responsible for having procedures in place for the effective management of the cash floats and imprest accounts.
- 4.15.3 All cash floats and imprest accounts to be certified as correct by the Director at the end of each financial year, as part of the year end closedown procedures.

4.16 Employees

- 4.16.1 The Head of Human Resources, in consultation with the Chief Finance Officer, is responsible for the provision of all HR and payroll/pension related policies and procedures;
- 4.16.2 The Chief Finance Officer/Head of Human Resources are responsible for paying employees securely, accurately and on time;
- 4.16.3 Directors are responsible for managing their employee resource by:
 - (a) ensuring compliance with all Human Resources and payroll/pension policies and procedures;
 - (b) effective workforce development and planning, including ensuring that staffing levels can be funded from the approved budget provision;
 - (c) monitoring employee costs through monthly budget reports;
 - (d) effective vacancy management.
- 4.16.4 The Chief Finance Officer/Head of Human Resources will only authorise payments outside of the normal payroll runs (Pay Advances) where they are satisfied there are exceptional circumstances that warrant such action and that no duplication of payment will occur.
- 4.16.5 Directors are responsible for maintaining absence records (annual leave and sickness etc.) and for supplying the Chief Finance Officer/Head of Human Resources with all information necessary for this purpose on the prescribed forms or by other arrangement agreed with them:

- (a) Such information will include full details of new appointments, resignations and dismissals, attendance records, sickness certificates, overtime claims, bonuses and other particulars affecting the processing and payment of salaries and wages;
- (b) Such information should be supplied complete and promptly in order to meet payroll deadlines;
- (c) All time records or other pay documents will be certified (in manuscript or electronically) by or on behalf of Directors. The names of officers authorised to sign such records will be sent to the Chief Finance Officer/Head of Human Resources, together with specimen signatures and will be amended on the occasion of any change. Any proposed alternative arrangements, for example the use of electronic facilitation, will be approved by the Chief Finance Officer/Head of Human Resources and incorporate adequate security and controls.
- (d) Where the Chief Finance Officer/Head of Internal Audit carries out periodic certification exercises to obtain assurance from employing Directorates of the accuracy of payroll/pension records, Directors must ensure their Directorates respond fully and promptly.

4.16.6 Employees are required to comply with the Officers Code of Conduct, including the declaration of any outside employment, personal interests and offers/receipt of gifts and hospitality.

4.16.7 Directors are responsible for notifying the Chief Finance Officer of any declarations which could have financial implications for the Council, e.g. related party transaction inclusion in the Statement of Accounts.

5.0 Financial Systems and Procedures

5.1 General

5.1.1 Sound systems and procedures are essential to an effective framework of accountability and control.

5.1.2 The Chief Finance Officer is responsible for:

- (a) the operation of the Council's accounting and financial management systems;
- (b) the form of accounts and any supporting financial records;
- (c) advising Directors on the establishment and operation of trading accounts and business units;
- (d) approving any changes to existing financial systems or the establishment of new systems.

5.1.3 It is the responsibility of Directors to:

- (a) ensure the proper operation of financial processes in their own Directorates and agree with the Chief Finance Officer any changes to these processes to meet their own specific needs;
- (b) ensure that their employees receive relevant and appropriate financial management training that has been approved by the Chief Finance Officer;
- (c) ensure that employees are aware of their responsibilities under the Data Protection Act and Freedom of Information Act.

5.2 Contracts and Purchasing

5.2.1 All contracts and purchases, including ordering and committing expenditure, will be subject to the requirements of the Council's Contract Procedure Rules.

5.2.2 All contracts for the supply of goods and services or the undertaking of works will be in accordance with the Individual Cabinet Member Delegations:

Goods and Services

- (a) Up to £100,000 – Directors approval required;
- (b) Exceeding £100,000 to £2,000,000 – Individual Cabinet Members approval required;

- (c) Exceeding £2,000,000 – Cabinet approval required.

Light Touch Services

- (a) Up to £500,000 – Directors approval required;
- (b) Exceeding £500,000 to relevant EU threshold from time to time – Individual Cabinet Members approval required;
- (c) Exceeding relevant EU threshold – Cabinet approval required.

Works

- (a) Up to £500,000 – Directors approval required;
- (b) Exceeding £500,000 to relevant EU threshold from time to time – Individual Cabinet Members approval required;
- (c) Exceeding relevant EU threshold – Cabinet approval required.

Concession Contracts

- (a) Up to £500,000 – Directors approval required;
- (b) Exceeding £500,000 to relevant EU threshold from time to time – Individual Cabinet Members approval required;
- (c) Exceeding relevant EU threshold – Cabinet approval required.

5.2.3 The Head of Procurement is responsible for:

- (a) preparing the Contract Procedure Rules and for promoting and embedding them throughout the Council;
- (b) maintaining a continuous review of the Contract Procedure Rules and submitting any additions or changes as necessary to the Audit Committee for approval.

5.2.4 No alternative procurement arrangements will be implemented without the approval of the Chief Finance Officer/Head of Procurement.

5.2.5 No credit arrangements (e.g. leasing agreements or other annual or deferred payment schemes) are to be made without the approval of the Chief Finance Officer or under arrangements already approved by the Chief Finance Officer. Directors must ensure that appropriate records are maintained in respect of all lease agreements with related obligations and that any property/equipment that is subject to lease agreements is identifiable.

- 5.2.6 Under no circumstances should any purchasing arrangement of the Authority be used to obtain goods or services for private or personal use.
- 5.2.7 The Chief Finance Officer is responsible for ensuring efficient and effective arrangements for all payments.
- 5.2.8 The following requirements should be adhered to in relation to the payment of accounts:
- (a) The normal method of payment from the Council will be by BACS or cheque or other instrument (including direct debit, EFT's, CHAPS, purchase card and standing orders) drawn on the Council's bank account by the Chief Finance Officer;
 - (b) Directors issuing an order in whatever form are responsible for examining, verifying and certifying the related invoice or transaction log;
 - (c) At least two officers should be involved in the verification process, which should be evidenced. The budget provision under which the expenditure was incurred will be indicated by completion of the expenditure code together with the appropriate VAT treatment by the Director concerned;
 - (d) Certified accounts will be passed for payment to the Chief Finance Officer to comply with the suppliers/contractors payment terms, and with due account taken of the Late Payments of Commercial Debts (Interest) Act 1998;
 - (e) Directors are responsible for notifying the Chief Finance Officer, in accordance with the annual timetable for closure, of all outstanding expenditure relating to the previous financial year and when such payments are made he will be notified accordingly.
- 5.2.9 Directors are responsible for ensuring:
- (a) that before entering into purchasing commitments, the estimated cost is covered by financial provision in the budget to which it relates;
 - (b) that the Contract Procedure Rules and any payment procedures are adhered to in their Directorates;
 - (c) that appropriate records are maintained and registers completed to substantiate and record decisions made under delegated powers;
 - (d) that all employees within their Directorate are aware of any guidance issued by the Chief Finance Officer and for ensuring that effective internal controls are established to ensure compliance;

- (e) the care and custody of stocks and stores in their Directorate and for the provision of control systems commensurate with risks faced and values;
- (f) up to date inventories of furniture, fittings, equipment, office machinery, vehicles, movable plant and machinery, rolling stock and similar property within their Directorate;
- (g) that property is appropriately security marked and formal procedures are established to record equipment removed from the premises;
- (h) that physical checks are undertaken and evidenced at least annually, with discrepancies fully investigated.

5.3 Officers and Members Allowances

- 5.3.1 The Chief Finance Officer/Head of Human Resources are responsible for operating secure and reliable systems to process Officers and Members Allowances.
- 5.3.2 Officers travel and subsistence allowances will be paid by the Chief Finance Officer/Head of Human Resources in accordance with the Travel and Subsistence Policy.
- 5.3.3 Members basic, special responsibility and travel and subsistence allowances will be paid by the Chief Finance Officer/Head of Human Resources in accordance with the Council's Members Allowances Scheme.
- 5.3.4 It is the responsibility of Officers and Members to claim for travel and subsistence by:
 - (a) submitting claims in the prescribed form determined by the Chief Finance Officer;
 - (b) submitting claims within three months of the date on which the duty was carried out (any Officer claims outside this period will require the approval of the Director);
 - (c) certifying their claim as an accurate record, for payment to be made;
 - (d) submitting VAT receipts with claims wherever possible.

5.4 Taxation

5.4.1 The Chief Finance Officer (and Head of Human Resources in relation to personal taxation) is responsible for:

- (a) ensuring that appropriate advice and guidance is available for Directors on all taxation issues that affect the Council, having regard to guidance issued by appropriate bodies and relevant/applicable legislation;
- (b) for maintaining the Council's tax records, making all payments, receiving tax credits, submitting statutory tax returns by their due date and complying with HMRC regulations.

5.4.2 Directors are responsible for:

- (a) Obtaining advice from the Chief Finance Officer (and Head of Human Resources in relation to personal taxation) on all taxation issues that affect their Directorate;
- (b) compliance with any guidance issued by the Chief Finance Officer (and Head of Human Resources in relation to personal taxation).

5.5 Housing Revenue Account

5.5.1 The Chief Finance Officer is responsible for:

- (a) making arrangements for the preparation of annual Housing Revenue Account budgets (revenue and capital) as part of the Council's budget setting process;
- (b) making recommendations, as appropriate, to the Cabinet and/or Full Council to enable the Council to fulfil its statutory duties in relation to the Housing Revenue Account (housing rent determinations, welsh housing quality standards, major repairs allowance and 30 year business plan);
- (c) preparing annual accounts for the Housing Revenue Account to be incorporated into the Council's Statement of Accounts.

6.0 Partnerships

- 6.1 Full Council and/or the Cabinet, as appropriate, are responsible for approving the Council's involvement in formal partnerships with other local, public, private, voluntary and community sector organisations. They will also be responsible for approving any delegations of power, e.g. regional working Joint Committees.
- 6.2 Full Council and/or the Cabinet, as appropriate, are responsible for the nomination of Members to represent the Council on partnerships and external bodies.
- 6.3 The Chief Executive is responsible for the nomination of Directors, or senior managers, to represent the Council on partnerships and external bodies.
- 6.4 The Director, or senior manager, representing the Council on a partnership or external body will be responsible for consulting with the Chief Finance Officer on the accounting and audit arrangements to be adopted, and consulting with statutory officers on the governance and risk management arrangements to be adopted.
- 6.5 The Monitoring Officer (or designated Monitoring Officer of a partnership or external body) is responsible for promoting and maintaining the same high standards of Member conduct in partnerships and external bodies that apply to the Council.

7.0 Clarification and Contacts

7.1 Where clarification on any aspect of the Financial Regulations is required, please contact one of the following officers:

Jon Haswell	Director of Resources (Section 151 Officer)
Ian Eynon	Head of Finance & Business Services (Deputy S151 Officer)
Sarah Edwards	Finance Manager
Nicola Lewis	Finance Manager
Caroline Lawley	Finance Manager
Huw Jones	Finance Manager
Richard Edwards	Principal Finance & Transformation Officer
Jo Hendy	Governance, Assurance & Information Manager (Head of Internal Audit and Data Protection Officer)
Matthew Holder	Audit, Risk & Counter Fraud Manager
Paul Ashley-Jones	Head of Procurement
Steven Jones	Director of Community Services (Asset related matters only)
Ceri Davies	Head of Human Resources (Payroll related matters only)