

Sanctuary Group

Financial Regulations (Scotland)

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Financial Regulations

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General Introduction

All activities of the Group's Scottish subsidiaries must be in accordance with statutory requirements and with the requirements of the Scottish Housing Regulator. In cases of conflict such requirements shall supersede any provision of these Financial Regulations.

Compliance with the Financial Regulations is compulsory for all staff connected with the Group. It is the responsibility of the Director - Sanctuary Scotland and Heads of Departments to ensure all staff are made aware of the existence and content of the Financial Regulations (Scotland) and that all employees are aware of where to obtain information on the Financial Regulations (Scotland).

FR1 1.1 Interpretation

“Administrator” means any officer appointed to the post of Administrator;

“Administration Assistant” means any officer appointed to the post of Administration Assistant;

“Administration Officer/Senior Administration Assistant” means any officer appointed to the post of Administration Officer/Senior Administration Assistant;

“Area Manager” means an officer whose job title is Area Manager;

“Asset Director - Care” means the officer appointed to the post of Asset Director - Care;

“Care Regional Maintenance Managers” means any officer appointed to the post of Care Regional Maintenance Managers;

“Chair” means the person holding the office of Chair or Chair of Sanctuary Housing Association or Sanctuary Scotland Housing Association Limited (Sanctuary Scotland Housing Association);

“Chief Customer Officer” means the officer appointed to the post of Chief Customer Officer;

“Chief Financial Officer” means the officer appointed to the post of Chief Financial Officer;

“Chief Operating Officer - Commercial” means any officer of the Association or a Subsidiary whose job title is Chief Operating Officer – Commercial;

“Committee” includes the Group Audit and Risk Committee and any other committees formed in accordance with the Rules of the Association;

“Construction Director” means the officer appointed to the post of Construction Director or Construction Director - Scotland;

“Contract Manager - Care” means the officer appointed to the post of Contract Manager - Care;

“Customer Care Manager” means any officer appointed to the post of Customer Care Manager;

“Customer Contact Manager” means any officer appointed to the post of Customer Contact Manager;

“Customer Delivery Manager” means any officer appointed to the post of Customer Delivery Manager;

“Deputy Heads of (Property)” means any officer appointed to the post of Deputy Head of within Property Services;

“Designated Staff Member” means any officer with delegated authority for a specific activity. The delegated authority, specific activity and level of delegated authority (£) must be in writing from a Director (apart from GPC cards where requests may be made by a staff member) and be addressed to the Company Secretary and approved by either the Group Chief Executive or Chief Financial Officer. Where no authority level is stipulated, the authority levels will be as designated within the Group Financial Regulations;

“Director” means any officer of the Group whose job title is “Director” and includes the Group Chief Executive, Chief Financial Officer, Chief Information Officer, Chief Customer Officer and Chief Operating Officer - Commercial;

“Director of Corporate Finance” means the officer appointed to the post of Director of Corporate Finance;

“Director of Finance - Care & SSL” means the officer appointed to the post of Director of Finance - Care & SSL;

“Director - Financial Planning and Analysis” means the officer appointed to the post of Director - Financial Planning and Analysis;

“Director of Group Finance” means the officer appointed to the post of Director of Group Finance;

“Director of Customer Experience and Compliance” means the officer appointed to the post of Director of Customer Experience and Compliance

“Director of Information Technology” means the Officer appointed to the post of Director of Information Technology;

“Development Director - England” means the officer appointed to the post of Development Director - England;

“Development Director - National” means the officer appointed to the post Development Director National;

“Development Director - Scotland” means the officer appointed to the post of Development Director - Scotland;

“Director - Sanctuary Scotland” means the officer appointed to the post of Director - Sanctuary Scotland;

“Director of Property Management - Care” means any officer appointed to the post of Director of Property Management - Care;

“Director of Property Services” means the officer appointed to the post of Director of Property Services;

“Director - Sanctuary Students” means any officer appointed to the post of Director - Sanctuary Students;

“Director - Treasury Services” means the officer appointed to the post of Director of Treasury Services;

“Executive Committee” is the Executive Committee of the Group, membership of which is determined by the Group Chief Executive;

“Executive Director - Corporate Services” means the officer appointed to the post of Executive Director - Corporate Services;

“Finance Director - Affordable Housing” means the officer appointed to the post of Finance Director - Affordable Housing;

“Financial Year” means the year beginning on the first day of April and ending the last day of March;

“Finance Director - Development” means the officer appointed to the post of Finance Director - Development;

“Finance Manager” means any officer appointed to the post of Finance Manager;

“Gas Resource Planner” means any officer appointed to the post of Gas Resource Planner;

“General Meeting” is a meeting of the shareholders/guarantors of Sanctuary Scotland called in accordance with its Rules;

“Governing body” means the Board of Management of Sanctuary Scotland;

“Group Audit and Risk Committee” means the Audit and Risk Committee of the Group, appointed by the Group Board;

“Group Board” means the governing body of Sanctuary Housing Association;

“Group Chief Executive” means the officer appointed to the post of Group Chief Executive;

“Group Director” means any officer appointed to the post of; Chief Financial Officer, Chief Operating Officer – Commercial, Chief Information Officer, Chief Customer Officer, Group Managing Director - Asset Strategy and Development, Executive Director - Corporate Services, Group Director - Growth & Partnerships or Group Director - Sustainability & Climate Change;

“Group Facilities Manager” means any officer appointed to the post of Group Facilities Manager;

“Group Managing Director - Asset Strategy and Development” means the officer appointed to the post of Group Managing Director - Asset Strategy and Development;

“Group Procurement” means the central Group Procurement team based in Worcester;

“Head of Asset Sustainability” means the person appointed to the post of Head off Asset Sustainability;

“Head of Business Information” means the Officer appointed to the post of Head of Business Information;

“Head of Construction” means the officer appointed to the post of Head of Construction;

“Head of Customer Contact Centre” means the officer appointed to the post of Head of Customer Contact Centre;

“Head of Compliance Delivery” means the officer appointed to the post of Head of Compliance Delivery;

“Head of Housing” means an officer whose job title is Head of Housing;

“Head of Operations - Gas and National” means the officer appointed to the post of Head of Operations - Gas and National;

“Heads of Finance” means any officer whose job title is Head of Finance;

“Head of Financial Analysis” means the officer appointed to the post of Head of Financial Analysis;

“Head of Financial Reporting” means the officer appointed to the post of Head of Financial Reporting;

“Head of Operations - Fire and Security” means the officer appointed to the post of Head of Operations - Fire and Security;

“Head of Operations - Property” means the officer appointed to the post of Head of Operations - Property;

Head of Regeneration” means the officer appointed to the post of Head of Regeneration;

“Head of Shared Service Centre” means the officer appointed to the post of Head of Shared Service Centre;

Head of Technical and Design” means the officer appointed to the post of Head of Technical and Design;

“Housing Manager” means an officer whose job title is Housing Manager;

“Managing Director – Care” means the officer appointed to the post of Managing Director – Care;

“Member” means a member of the Board of Management of Sanctuary Scotland;

“National Head of Asset Sustainability” means the officer appointed to the post of National Head of Asset Sustainability;

“National Head of Compliance Delivery” means the officer appointed to the post of National Head of Compliance Delivery;

“National Head of Property Services Hub” means the officer appointed to the post of National Head of Property Services Hub;

“Officer” means an employee of Sanctuary Scotland;

“Operations Director” means any officer appointed to the post of Operations Director;

“Performance Improvement Manager” means any officer appointed to the post of Performance Improvement Manager;

“Performance Improvement Officer” means any officer appointed to the post of Performance Improvement Officer;

“Programme Management Team Members” means any officer reporting to the Head of Development – Programme Delivery or Director of Programme Management; “Senior Staff Member (Property)” covers grades 9 to 14;

“Property Surveyors” means any officer appointed to the post of Property Surveyor within Assets, Maintenance and Seniors;

“Purchase Officer” means an officer responsible for raising purchase requisitions and receipting of purchase orders;

“Regional Head of Customer Delivery (Property)” means any officer appointed to the post of Regional Head of Customer Delivery;

“Regional Maintenance Manager” means any officer appointed to the post of Regional Maintenance Manager;

“Resource and Scheduling Manager” means any officer appointed to the post of Resource and Scheduling Manager;

“Resource Planner” means any officer appointed to the post of Resource Planner;

“Rules” means the Rules or Memorandum and Articles of Association of the Association (as the context requires);

“Scheduling Manager” means any officer appointed to the post of Scheduling Manager;

“Senior Administrator” means any officer appointed to the post of Senior Administrator;

“Senior Customer Care Manager” means any officer appointed to the post of Senior Customer Care Manager;

“Senior Customer Contact Manager” means any officer appointed to the post of Senior Customer Contact Manager;

“Senior Field Workforce Planner” means any officer appointed to the post of Senior Field Workforce Planner;

“Senior Finance Manager” covers grades 10 to 13 inclusive;

“Senior Manager” means any officer appointed to the post of Senior Managers in Housing, Sanctuary Care, Supported Living, Home Care, Extra Care, Student and Market Rented;

“Service Delivery Manager” means any officer appointed to the post of Service Delivery Manager;

“Shares” includes stock and the expression “share capital” shall be construed accordingly;

“Statutory enactment” means, as well as any Act of Parliament, any Order, Rule, Regulation or Scheme made by the authority of Parliament;

“Sub committee” means any sub committee of the Board of Management of Sanctuary Scotland;

“Team Manager” means any officer appointed to the post of Team Manager;

“Trade Supervisor” means any officer appointed to the post of Trade Supervisor;

“Vice Chair” means the person appointed to the post of Vice Chair of Sanctuary Housing Association or Sanctuary Scotland;

FR2

Budgets

- 2.1 The Director - Sanctuary Scotland will prepare an annual budget each year for detailed consideration and approval by the governing body prior to submission to the Executive Committee and Group Board for ratification. The annual budget shall cover all areas of activity and shall show income and expenditure in detail well as capital expenditure planned for the year.
- 2.2 The governing body delegate to the Director - Sanctuary Scotland the authority to spend up to the approved Budget limit.
- 2.3 Variations in actual income and expenditure against budget shall be reported to the governing bodies no less frequently than quarterly.
- 2.4 The Director - Sanctuary Scotland may, with the approval of the Chief Financial Officer, switch budget amounts between different budget headings.

FR3

Financial and Management Accounting

- 3.1 The following information to the applicable extent shall be reported to the governing body or to any Sub Committee to which the governing body has specifically delegated authority to consider this information at the noted frequency (unless prior agreed with the Chief Executive)::

| | At least |
|---------------------------------|-----------------|
| Audited Accounts | Yearly |
| Rent Arrears | Quarterly |
| Cash flow and Financing | Quarterly |
| Budgets - Capital and Resources | Yearly |
| Management Accounts | Quarterly |
| Property Sales | Half yearly |

- 3.2 The governing body and the Group Board may require additional reports as deemed necessary from time to time.

FR4 **Registers and Books of Record**

- 4.1 The Director - Sanctuary Scotland is responsible to the governing body for ensuring appropriate financial records are kept which meet legislative and regulatory requirements.

FR5 **Orders for Goods and Services**

- 5.1 No order shall be issued for goods or services unless the cost is covered by an approved annual revenue or capital budget, except as permitted under FR7.
- 5.2 All purchase orders must be authorised in accordance with the authorisation levels set out in FR7 below.
- 5.3 No request for goods or services shall be communicated to a supplier who has not already been approved through the Group's supplier process and authorised for use by Group Procurement. Exceptions to this require approval in writing from the Group Chief Executive.
- 5.4 No request for goods or services shall be communicated without a duly authorised purchase order number issued in advance of supply. All purchase orders shall indicate clearly the nature and quantity of the work or service required and any contract or agreed price relating thereto except for where a purchase order is not required.
- 5.5 A purchase order is not required for following expenditure:
- a) Utilities;
 - b) General rates, water rates;
 - c) Government Procurement Cards;

- d) Company Credit Cards;
- e) Council tax; and
- f) Rent due to third party landlords.

5.5.1 Other exceptions, including transitional arrangements for acquisitions and other new entrants to the Group, require the approval of the Group Chief Executive, or Chief Financial Officer, or Director - Treasury Services, or Director of Group Finance or Director - Financial Planning and Analysis.

5.5.2 An exception to this relates to Government Procurement Cards (GPC). Employees that are in receipt of a GPC (in line with Sanctuary GPC requisition policy) are able to expend in accordance with their agreed limits. The standard default limits are detailed in the table below.

| Business Division | Role | Monthly credit limit (£) | Transaction limit (£) |
|--------------------------|---|---------------------------------|------------------------------|
| Care | All | 500 | 100 |
| Property & Compliance | Operatives/ Fire Services | 250 | 100 |
| Property & Compliance | Supervisors/ Ops Managers | 1,000 | 300 |
| Property | Heads of | 5,000 | 1,500 |
| Property | Estates | 1,400 | 250 |
| Housing | Avenue Services | 500 | 100 |
| Development | All | 1,000 | 300 |
| Housing | Housing officer | 500 | 100 |
| Housing | Area Manager | 3,000 | 500 |
| Housing | Housing Manager / Heads of | 5,000 | 1,500 |
| Students | All | 1,000 | 500 |
| Corporate Services | Finance, Central functions and Technology | 500 | 100 |
| Housing | Decants (Customer Case Manager) | 25,000 | 5,000 |
| All | Directors | 5,000 | 1,000 |
| Corporate Services | Business managers/ Heads of | 1,500 | 300 |
| Governance and Legal | All | 1,000 | 500 |
| Sales and Marketing | All | 1,000 | 300 |

- 5.6.1 Default limits are subject to change with written authorisation from the Chief Financial Officer. Approval of expenditure takes place retrospectively in line with **Appendix 1**.

FR6 Certification of Goods and Services Received

- 6.1 All documents transmitted electronically or sent to the Group Finance Department for processing for payment, with the exceptions of items covered in 5.3, must be matched to an authorised purchase order approved by an Officer with the appropriate level of authority as set out in FR7. Authorisation is deemed to certify that:
- a) the goods have been received, examined and approved as to the quality and quantity, or that the work/service has been carried out satisfactorily in accordance with the order;
 - b) the prices and expenditure codes are correct; and
 - c) the account has not previously been authorised for payment and is to be paid.
- 6.2 Once goods or services have been received, Purchase Officers will receipt against the purchase order in a timely fashion that permits suppliers to be paid on time in accordance with the Group's standard payment terms.
- 6.3 The Group Finance Department will not accept statements or photocopies of accounts for processing unless instructed to do so by the Group Chief Executive, or Chief Financial Officer, or Director - Treasury Services, or Director of Group Finance or Director - Financial Planning and Analysis.
- 6.4 Responsibility for certifying the accuracy of an account for payment, except in payments due under a contract that provides for independent certification, lies with the Officer who authorises the payment.
- 6.5 Invoices shall be paid in accordance with the Group's standard terms of business with the exception of:
- a) Capital works certificates which shall be paid by their contractual date which is assumed to be 21 days after the issue date;
 - b) Public Utilities invoices (e.g. Electricity, Gas, telephones etc.) which shall be paid in accordance with the supplier terms and conditions;
 - c) General Rates, water rates and loan repayments shall be paid by the due by date;

- d) Government Procurement Cards; direct debit arrangements as laid down by terms and conditions with the card provider (all expenditure being approved in line with these regulations);
- e) Company Credit Cards; direct debit arrangements as laid down by terms and conditions with the card provider; and
- f) Other direct debit payments, where the total cost for the duration of the direct debit has been approved in accordance with section FR7.

6.5.1 Other exceptions to these terms require the approval of the Group Chief Executive, or Chief Financial Officer, or Director - Treasury Services, or Director of Group Finance, or Director - Financial Planning and Analysis.

FR7 **Authorisation Levels for Expenditure**

7.1 Staff are authorised to approve levels of revenue expenditure as set out by **Appendix 1** Table 1 (all amounts include VAT). These levels apply to at risk matrix expenditure authorised by the Group Managing Director - Asset Strategy and Development, Director - Development and Finance Director – Development as outlined in the unapproved/pre contract matrix shown below. Any expenditure in excess of the approved abortive cost budget must be authorised by the Chief Financial Officer or the Group Chief Executive.

| Project Status | Code | Definition | Requires Chief Financial Officer sign off |
|----------------|------|---|--|
| Feasible | FEAS | Investigatory stage | Any item of expenditure exceeding £10,000 once total project expenditure exceeds £50,000 |
| Bid submitted | BIDS | Bid submitted for acquisition | Any item of expenditure exceeding £10,000 once total project expenditure exceeds £50,000 |
| Bid accepted | BIDA | Bid accepted for acquisition – subject to Board/treasury approval | Any item of expenditure exceeding £10,000 once total project expenditure exceeds |

| | | | |
|---------------------------|------|---|--|
| | | | £50,000 |
| Existing asset | FIXA | Existing asset development – pre contract | Any item of expenditure exceeding £10,000 once total project expenditure exceeds £50,000 |
| Committed – without land | APPR | Board/Treasury approved | Any item of expenditure exceeding £10,000 once total project expenditure exceeds £50,000 |
| Committed – with land | ACQD | Land purchase completed | NO – expenditure sign off in line with Appendix 2 |
| In contract | CNTR | In contract, not yet on site | NO – expenditure sign off in line with Appendix 2 |
| On site – main contractor | ONST | On site | NO – expenditure sign off in line with Appendix 2 |
| On site – in house | ONST | On site | NO – expenditure sign off in line with Appendix 2 |
| Complete | PCOM | Full scheme reached practical completion | |
| Post completion | POST | Last sales complete/retention paid | |

- 7.2 Entering into a contract for the purchase of the property at a regeneration scheme (buy back), can be treated as contracted expenditure for the purposes of approval and does not need to be approved by the Chief Financial Officer, provided the expenditure is still approved inline with financial regulations.
- 7.3 Property staff can use the delegated approval levels shown in **Appendix 1** (Table 2) provided prior written approval has been obtained from the appropriate level of seniority.
- 7.3 All leases can only be signed as outlined in SO10 of the Scotland Standing Orders.
- 7.4 Staff are authorised to approve levels of expenditure for capital expenditure, development and reinvestment as set out by **Appendix 2** (all amounts include VAT).
- 7.5 Expenditure incurred in the construction of a property, for rent or sale, to be treated as capital expenditure for the purpose of

approvals within Finance Regulations. Although the expenditure may ultimately be incurred through the income and expenditure account.

- 7.6 In order to ensure the continuity of service during a significant incident, authority can be delegated to cover for staff absence using the Delegation of Approval Authority form attached at Appendix 3. This must be authorised by the Group Chief Executive or the Chief Financial Officer. This is a temporary measure and will be removed once conditions allow.

FR8 **Banking Arrangements and Bank Mandates**

- 8.1 Barclay's Bank plc is the Group's main clearing bank, the governing body of Sanctuary Scotland has delegated authority to establish and maintain bank accounts with the following:

Barclays Bank plc.

- 8.2 Investments are placed with financial institutions as approved by the governing body. The credit rating of all financial institutions with whom the Group has an exposure are monitored on a monthly basis and reported to the Group Audit and Risk Committee on a quarterly basis. The following are approved institutions for the investment of surplus funds;

Nationwide Building Society.

- 8.3 Any cheques, electronic payments, drafts, bills, promissory notes, acceptances, negotiable instruments, orders and instruction for Group accounts (except those covered by 9.5) where pre-approval does not exist may be signed by the Group Officers referred to below, subject to Table A. Where revenue expenditure has been pre-approved in line with these regulations (e.g. approved PO; approved Non-PO; OTV; approved VAT payments; approved payroll related payments and so on), the submission of the total 'request to pay' to the bank may be approved by Group Officers referred to below subject to Table B.

Table A

| | |
|---------------------------|---|
| £1,000 or less | Any 1 signature from either List A or List B |
| £1,000.01 to £15,000 | Any 2 signatures from either List A or List B |
| £15,000.01 to £999,999.99 | 2 signatures with a least one being from List A |
| £1,000,000 or more | 2 signatures from List A |

| | |
|---|---|
| £50,000 or less | Any 1 signature from either List A or List B |
| All other total payment amounts | 2 signatures with a least one being from List A |
| Any invoices included in the above £1,000,000 or more | A second signature from List A for each invoice |

Table B

| List A | List B |
|--|-------------------------|
| Group Chief Executive | Heads of Finance |
| Chief Financial Officer | Senior Finance Managers |
| Director of Group Finance | Finance Manager |
| Director - Financial Planning and Analysis | |
| Director - Treasury Services | |
| Director - Corporate Finance | |
| Director of Finance – Care & SSL | |
| Finance Director - Affordable Housing | |
| Finance Director - Development | |

- 8.4 The authorisation levels in the tables above will also apply to new payments and the amendment or removal of existing payment direct debits or standing orders. The levels will apply to the estimated annual cost of the goods or services. The authority will automatically renew each year providing the expected cost is covered by an approved budget. If the spend is expected to exceed the approved budget, additional authorisation must be obtained in line with the tables at 8.3.
- 8.5 Approval of contractual interest payments and repayment of principal in line with signed loan facilities.

| | |
|---------------------------|--|
| £1,000 or less | Any 1 signature from either List A or List B |
| £1,000.01 to £15,000 | Any 2 signatures from either List A or List B |
| £15,000.01 to £999,999.99 | 2 signatures with at least 1 being from List A |
| £1,000,000 or more | 2 signatures from List A |

| List A | List B |
|--|-------------------------|
| Group Chief Executive | Heads of Finance |
| Chief Financial Officer | Senior Finance Managers |
| Director - Treasury Services | |
| Director of Group Finance | |
| Director - Financial Planning and Analysis | |
| Director - Corporate Finance | |
| Director of Finance – Care & SSL | |
| Finance Director - Affordable Housing | |
| Finance Director - Development | |

- 8.6 Authority to incur redemption penalties requires Group Board approval.
- 8.7 Investment of surplus funds with approved financial institutions to be approved as in 8.5 above.

FR9 Petty Cash Imprests

- 9.1 The Director - Sanctuary Scotland is authorised to establish petty cash imprests in offices and/or schemes in accordance with the approved policy on petty cash.

FR10 Writing Off Irrecoverable Income

- 10.1 Income is written off in accordance with the accounting policies of the Group when the debt is deemed to be irrecoverable. Before any income is written off in the financial records of Sanctuary Scotland, the approval of the Governing body must be obtained. The Governing body shall also approve the writing off of any arrears of rent and sundry debts. All write offs shall also require the authorisation of the Chief Financial Officer, or Director - Treasury Services, or Director of Group Finance or Director - Financial Planning and Analysis or Director of Finance – Care & SSL or Finance Director - Affordable Housing. Write offs individually over £100,000 also require approval from either the Group Chief Executive or the Chief Financial Officer.
- 10.2 A report will be provided to the Governing body at its first meeting after 31 March each year to outline the value of debts written in the financial year just ended along with details of any individually significant items.

FR11 Depreciation and Amortisation Policy

- 11.1 Depreciation and amortisation rates will be as set out in specific Capital policies and set out in the annual statutory accounts.
- 11.2 The Group Chief Executive and the Chief Financial Officer are authorised to apply different depreciation/amortisation rates when the specific nature of the asset so requires it.

FR12 Pay and Expenses - Officers

- 12.1 Wages and salaries will be paid in accordance with the approved Group policy on pay and benefits. All salaries shall be paid through the payroll and not through petty cash, regardless of how small the payment or how short the period of employment.
- 12.2 The monthly and lunar payrolls shall be authorised by one of Group A and released on Webseries by a different member of Group B where:

| Group A |
|--|
| Group Chief Executive Chief Financial Officer Director - Treasury Services Director of Group Finance Executive Director - Corporate Services Director - Financial Planning and Analysis Director - Corporate Finance |

| Group B |
|--|
| Chief Financial Officer Director – Corporate Finance Director of Group Finance Director – Financial Planning and Analysis Head of Financial Analysis Head of Financial Reporting Head of Shared Service Centre Senior Finance Manager - Group Reporting |

- 12.3 Requests for manual payments outside of the monthly pay runs should be requested via a Manual Payment request form available on Solis. This form is reviewed and approved by the payroll team. The payment will be approved and paid in line with FR8.3.
- 12.4 Sanctuary Scotland shall pay travel expenses and subsistence to Officers accordance with the approved travel, subsistence

and other expenses policy. Line managers shall approve all expenses. Any expense claims of £750 or above shall be approved in addition by a Director.

- 12.5 Annual salary increases shall be determined in accordance with the Group policy on pay and remuneration.

FR13 Members' Expenses

13.1 While the provisions of Schedule 7 to the Housing (Scotland) Act 2001 were repealed in April 2010, the spirit of Schedule 7 is still applied in order to maintain high levels of probity.

13.2 Sanctuary Scotland's policy is to pay expenses to Members necessarily incurred on their business. "Sanctuary Scotland's business" is defined as follows:

- a) Any properly convened and recorded Meeting of the Board, a Committee, Sub Committee or Working Group of the Sanctuary Scotland with an Officer in attendance; or
- b) Any training event, seminar or conference authorised in advance by the Director - Sanctuary Scotland: or
- c) Any properly convened meeting of any other organisation or body which Members are required to attend as delegates or representatives of Sanctuary Scotland and where expenses cannot be claimed from that other organisation or body; or
- d) Any other meeting or event authorised in advance by the Director - Sanctuary Scotland.

13.3 The circumstances in which Members can claim for reimbursement of expenses and the procedure for applying for such expenses is set out in the Sanctuary Housing Association policy and procedure entitled "Gifts, Hospitality and Legacies". It is the responsibility of Members to comply with this policy and procedure.

FR14 Cash Receipts and Payment

14.1 All cash collected shall be recorded on a standard cash sheet. Issue of these sheets shall be recorded. All cash so received should be banked without delay in accordance with instructions issued by the Chief Financial Officer.

FR15 Collection and Banking of Income

15.1 The arrangements for the collection of all monies due to Sanctuary Scotland shall be under the control of the Chief

Financial Officer but with delegation given to the Director - Sanctuary Scotland.

- 15.2 All monies received on behalf of Sanctuary Scotland shall be banked in the relevant account.
- 15.3 The Chief Financial Officer may require the Director - Sanctuary Scotland to furnish such particulars of charges for work done, goods supplied and services rendered and of amounts accruing due, in order to ensure that there is prompt recording of all sums receivable.

FR16 Rent Setting and Reviewing

- 16.1 Sanctuary Scotland's policy statement on Rent Setting determines the way in which rents for Scottish Secure Tenancies and Short Scottish Secure Tenancies are set and reviewed.
- 16.2 Tenancy agreements shall contain a rent review clause which allows the rent to be reviewed annually, normally on the first Monday in July each year.

FR17 Interim and Final Certificates

17.1 Major Repairs, Renewals and Improvements Contracts

The following officers are authorised to sign *interim and final* certificates in relation to major repairs, renewals and improvement contracts being administered by the Group's or Sanctuary Scotland's technical staff:

Director - Sanctuary Scotland;
Senior Manager; and
Senior Staff Member (Property).

17.2 Cyclical Decorations Contracts

The following officers are authorised to sign *interim* certificates in relation to cyclical decorations contracts being administered by the Group's or Sanctuary Scotland's technical staff:

Director - Sanctuary Scotland;
Senior Manager; and
Senior Staff Member (Property).

The following officers are authorised to sign *final* certificates in relation to cyclical decorations contracts being administered by the Group's technical staff:

Director - Sanctuary Scotland;

Senior Manager; and
Senior Staff Member (Property).

FR18 Scottish Housing Regulator - authorised signatories

- 18.1 The following Officers are authorised to sign the undernoted submissions to the Scottish Housing Regulator:

All documents:

Chair of governing body;
Group Chief Executive;
Chief Financial Officer;
Company Secretary;
Director - Sanctuary Scotland;
Director - Treasury Services;
Director of Group Finance;
Director - Financial Planning and Analysis;
Director of Corporate Finance;
Head of Business Information and Designated Staff
Members(via the Scottish Housing Regulator's portal); and
Deputy Company Secretary.
Finance Director – Development;
Senior Finance Manager.

All development scheme and major repair documents including grant applications and claims, except Consents for Disposal:

Development Director or Development Managers; or
Programme Management Team Members

Appendix 1
Approval limits for graded officers (Table 1)
Sanctuary Scotland Financial Regulations

Delegated authority limit for budget holders within approved budget/ specific approvals.

| Financial Impact | Sanctuary Scotland | *Unapproved budgets for all business units |
|--|---------------------------|---|
| Group Chief Executive | No Limit | £1,000,000 |
| Chief Financial Officer | No Limit | £1,000,000 |
| Group Director | £500,000 | £50,000 |
| Director of Group Finance/ Director - Financial Planning & Analysis / Director of Property Services/ Director - Treasury Services / Finance Director – Development / Director of Corporate Finance / Director of Customer Experience and Compliance | £250,000 | £15,000 |
| Director Operations Directors Heads of (grade 14 and above) | £150,000 | n/a |
| 13 / 12 Head of Housing | £50,000 | n/a |
| 11 Housing Manager | £30,000 | n/a |
| 10 Area Manager | £20,000 | n/a |
| 9 | £10,000 | n/a |
| 8 and below | £1,000 | n/a |
| Care Regional Maintenance Managers | £10,000 | n/a |
| Designated authorised staff only | Up to £3,000 | n/a |
| Property Surveyors (Assets, Maintenance, Senior) / Trade Supervisors | £5,000 | n/a |

*Expenditure unapproved by the Group Board or Executive Committee requires both the Group Chief Executive and Chief Financial Officer signatures for amounts over £250,000.
The Group Chief Executive and the Chief Financial Officer can approve across all approved budgets/cost centres.

Appendix 1**Sanctuary Maintenance Contractors Limited - Delegated approval limits (Table 2)**

Sanctuary Maintenance Contractors Limited only. Prior approved delegated authority limit for budget holders within approved budget/specific approvals.**

Delegated approval limits can only be used where written prior approval has been obtained from the appropriate level of seniority, otherwise the approval limits in **Appendix 1 (Table 1) apply.

| Group grade | SMCL grade | Affordable Housing/ Supported Living |
|--|-------------------|---|
| 14/ Head of Customer Contact Centre National Head of Property Services Hub | n/a | £200,000 |
| 11/ Senior Customer Contact Manager/Senior Customer Care Manager Customer Delivery manager | n/a | £30,000 |
| 10/Performance Improvement Manager/ Resource and Scheduling Manager/Customer Contact Manager/ Service Delivery Manager / Scheduling Manager | G/H | £20,000 |
| 9/Team Manager/Customer Care Manager/ Performance Improvement Officer | F | £20,000 |
| 8/Senior Field Workforce Planner | n/a | £10,000 |
| 7/Senior Administrator | DS | £10,000 |
| 7/Administrator/Resource Planner/ Gas Resource Planner | D | £10,000 |
| 5/Administration Officer/ Senior Administration Assistant | C | £5,000 |
| 4/Administration Assistant | B | £5,000 |

Appendix 2 Capital Expenditure

Sanctuary Scotland Financial Regulations

Delegated authority limits for budget holders within approved budget/ specific approvals including pre contract expenditure.

| Group grade (or Role Specific) | Approval level (excluding REPCAP) | Unapproved - Group* |
|---|-----------------------------------|---------------------|
| Group Chief Executive | No Limit | £1,000,000 |
| Chief Financial Officer | No Limit | £1,000,000 |
| Group Managing Director - Asset Strategy and Development | £5,000,000 | £15,000 |
| Chief Customer Officer Chief Operating Officer - Commercial Finance Director - Development Director of Property Services Director of Customer Experience and Compliance | £2,000,000 | £15,000 |
| Construction Director Director of Property Management - Care National Head of Asset Sustainability Regional Head of Customer Delivery (Property) Development Director - National Development Director - England Development Director - Scotland | £1,500,000 | £15,000 |
| Directors (Development) Head of Asset Sustainability | £750,000 | n/a |
| Development – Heads of | £250,000 | n/a |
| Head of Operations – Property Head of Operations – Gas and National Head of Operations – Fire and Security Head of Compliance Delivery | £150,000 | n/a |
| Group Directors Director - Sanctuary Students Director – Sanctuary Scotland 11, 12 and 13 Care Property staff only 11,12 Property Staff | £100,000 | n/a |
| Directors 10 Asset and Care Property staff only Grade 10 Property staff Director of Finance – Care & SSL Finance Director - Affordable Housing Heads of Housing | £50,000 | n/a |

| | | |
|--|---------|-----|
| Group Facilities Manager | £30,000 | n/a |
| Head of Operations - Gas and National Head of Operations - Fire and Security Contract Manager - Care Housing Managers | £25,000 | n/a |
| Head of Housing Grade 9 Care Property staff Grade 9 Property staff | £10,000 | n/a |
| Housing Managers Regional Maintenance Manager Grade 8 Property Care staff Grade 8 Property Staff | £5,000 | n/a |
| | | |

| Group grade (or Role Specific) | Property Services - REPCAP Only |
|--|--|
| Group Chief Executive | No Limit |
| Chief Financial Officer | No Limit |
| Chief Customer Officer Director of Property Services Director of Customer Experience and Compliance | £2,000,000 |
| National Head of Compliance Delivery Regional Head of Customer Delivery (Property) Head of Asset Sustainability | £1,500,000 |
| Head of Operations - Gas and National Head of Operations - Fire and Security Head of Operations - Property Deputy Heads of (Property) | £500,000 |
| Grades 11 & Grade 12 Property Staff | £25,000 |
| Grade 10 Property Staff | £15,000 |
| Grade 9 Property Staff | £12,500 |
| Grade 8 Property Staff | £10,000 |
| Grade 7 Property Staff | £5,000 |

*Expenditure unapproved by the Group Board or Executive Committee requires both the Group Chief Executive and Chief Financial Officer signatures for amounts over £250,000. The Group Chief Executive and Chief Financial Officer can approve across all approved budgets/cost centres. All company car purchases require the approval of one of the Group Chief Executive or Chief Financial Officer.

Appendix 3

Delegation of approval authority

By means of this form, I (Job Title)
delegate the approval levels as outlined below to
effective from/...../..... and shall terminate on/...../..... as
outlined in section FR 7.5 of the Group Financial Regulations (England) and
Financial Regulations (Scotland).

Revenue expenditure £.....

Capital expenditure £.....

These levels of approval apply across the following operations divisions;

Affordable Housing/Supported Living/Property Services/Care

Students and Commercial/Central Services*

Delete as required*

Approved.....(GCE/CFO)