



Financial Regulations

JUNE 2026

HEBRIDEAN HOUSING PARTNERSHIP |

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INTRODUCTION

WHY DO WE HAVE FINANCIAL REGULATIONS

- 1.1.1 To conduct its business effectively, a housing association needs to ensure that it has sound financial management systems in place and that they are strictly adhered to. Part of this process is the establishment of financial regulations which set the financial policies of the association.

STATUS OF FINANCIAL REGULATIONS

- 1.2.1 This document sets out the Financial Regulations which form part of our Constitutional Documents and provide a framework for managing our financial affairs.
- 1.2.2 The Financial Regulations apply to the Partnership and any subsidiary undertakings. The relationship between the various parts of the constitution is at Appendix 1.
- 1.2.3 Compliance with the Financial Regulations is compulsory for all our employees. It is the duty of the Chief Executive or delegated nominee(s) to ensure that these Regulations are adhered to. Such delegation may be explicit or may be implicit in the nature of the employee's title or job description.
- 1.2.4 All Board members and employees have a responsibility to take reasonable action for the security of the assets under their control, and for ensuring the use of these resources is legal, properly authorised and provides value for money.
- 1.2.5 All employees shall be supplied with, and formally acknowledge receipt of, a copy of these Regulations and any changes to them. It shall be the duty of each employee to observe them within the scope of their job description.
- 1.2.6 The Audit & Risk Committee shall review the Regulations at least annually.
- 1.2.7 Detailed financial procedures set out how the Regulations will be implemented and are in a separate manual. It is the Director of Finance & Corporate Services' responsibility to prepare and maintain the financial procedures and make them available to all employees and Board Members.

STATEMENT OF PRINCIPLES

- 2.1.1 The Board expects high standards of conduct from its members and employees and those with whom it has dealings and this is outlined in the Code of Conduct for Board Members and Code of Conduct for employees. The Board's core value of integrity together with openness and honesty will underpin its financial affairs and all those involved with its finances should work with these values in mind. An extension of this is the Statement of Principles below which provide the basis for the detailed guidance in the Financial Regulations.

THE PRINCIPLES

- 2.2.1 We expect our members and employees to exercise high standards in financial management and administration and we aim to stimulate openness and a climate of frankness that will be supported through policies and regulations, such as the Whistleblowing Policy.
- 2.2.2 Our core value as a business is Integrity and this is upheld through a competency framework which outlines the requirements of each role.
- 2.2.3 The importance of planning, monitoring and controlling the use of resources is vital and we will make arrangements for these activities to be undertaken effectively.
- 2.2.4 Issues of probity will be dealt with effectively and we will work to meet our duty to maintain proper accounts and related records.
- 2.2.5 Value for money is at the core of how we conduct our financial affairs.
- 2.2.6 Compliance with statutory requirements, accounting standards and appropriate codes of practice will be inherent in all our financial arrangements.
- 2.2.7 We are mindful of the need for consistent standards in financial administration and management across all our operations. In particular, we expect officers to consult with and use all the expertise in financial matters that it has available in house and act on advice from such sources.
- 2.2.8 Our assets and resources must be protected from loss, damage and theft.
- 2.2.9 Identifying and quantifying risks is of key importance and arrangements must be made to reduce, eliminate or insure against them as appropriate.
- 2.2.10 We will ensure that the payment and collection of monies is accurate, appropriate and timely.

FINANCIAL MANAGEMENT

THE BOARD

- 3.1.1 The Board has ultimate responsibility for our finances. Its financial responsibilities are to:

Ensure

- a) we are solvent;
- b) we safeguard our assets;
- c) the effective and efficient use of resources;
- d) the compliance with the Scottish Housing Regulators performance standards including the annual publication of our Assurance Statement.
- e) financial control systems are in place and are working effectively and that a statement of assurance is produced by the internal audit provider annually;
- f) compliance with the regulatory body's code of audit practice;
- g) compliance with financial covenants set up Funders

Approve

- h) our strategic plans;
- i) budgets and annual financial statements; and

Recommend

- j) to the Annual General Meeting the appointment of the external auditors.

COMMITTEE STRUCTURE

- 3.2.1 The Board exercises some of its responsibility through three subordinate committees. These are the Audit and Risk Committee, Development & Finance and the Joint Consultative Committee. General authority is not delegated to a Committee, but specific authority is delegated in particular areas as defined in the Standing Orders. However, no decision made by a Committee of the Board is binding on HHP unless it is acting within its specifically delegated powers. The Terms of Reference for the Committees is contained within the Standing Orders Part 3.

BOARD MEMBER

- 3.3.1 The duty of Board members is to HHP, its tenants, its employees and more generally where it is in receipt of public funds – to the community at large. All Board Members should therefore satisfy themselves that they have sufficient access to all relevant information and are sufficiently informed to be able to

make properly informed decisions. The Director of Finance & Corporate Services will ensure that regular management reports are made available to all Board Members.

RESPONSIBLE OFFICERS

The Chief Executive

- 3.4.1 The Chief Executive is responsible for the operational management of the association's affairs. The Chief Executive must assist the Board in determining its strategic goals and promote the achievement of such goals through the deployment of the association's resources.

The Company Secretary

- 3.5.1 The Company Secretary is responsible for advising all Board members and employees about who has the authority to take a particular decision and whether a decision is likely to be considered contrary to the policy framework.

The Director of Finance & Corporate Services

- 3.6.1 The Director of Finance & Corporate Services is responsible for promoting and maintaining high standards of financial conduct and for reporting any actual or potential breaches of the law or maladministration and for ensuring that the procedures for recording and reporting key decisions are operating effectively.
- 3.6.2 The Director of Finance & Corporate Services is responsible for reporting to the Chief Executive if he considers that any proposal, decision or course of action will involve incurring unlawful expenditure or is likely to cause a loss or deficiency, or if the Partnership is about to enter an item of account unlawfully. If the item in question relates to the Chief Executive, the Board and External Auditor will be advised accordingly.
- 3.6.3 The Director of Finance & Corporate Services has the responsibility for the proper administration of the financial affairs including:
- a) ensuring that all reports detail fully the resource implications of any course of action recommended to the Board or its Committees;
 - b) presenting management reports to the Board on a timely basis;
 - c) maintaining an efficient system of financial operations and controls;
 - d) preparing the annual accounts, liaising with the Partnership's Auditors in respect of the year end audit and giving the final presentation of such accounts to the Annual General Meeting;
 - e) managing the day to day running of our finances;
 - f) safeguarding our assets;
 - g) responsibility for long term financial planning;

- h) ensuring the requirements of the Financial Conduct Authority (FCA) are observed concerning the requirements of the Partnership to keep proper books and records;
- i) reviewing the Financial Regulations on behalf of the Board at least annually;
- j) maintaining statutory records;
- k) preparing appraisals for major investment and development decisions;
- l) ensuring that medium and long term financial plans and annual investment and revenue budgets are prepared;
- m) providing professional advice to the Board on all matters relating to financial policies and procedures including treasury management; and
- n) setting and monitoring compliance with financial management standards and procedures.

Money Laundering Reporting Officer

- 3.7.1 The Finance Manager is appointed as the Money Laundering Reporting Officer and the Financial Accountant is appointed as the Depute Money Laundering Reporting Officer. They are responsible for notifying the National Crime Agency (NCA) of any suspected cases of money laundering committed within the accounts of the Partnership as soon as possible and fulfil other duties as defined by legislation or regulation related to that post.

General

- 3.8.1 Heads of Service are responsible for accountability and control of employees and the security, custody and control of all other resources including plant, buildings, materials, cash and stores relating to their spheres of responsibility.

ACCOUNTING

- 3.9.1 All accounting procedures and records of the Partnership and its Officers shall be approved by the Director of Finance & Corporate Services in accordance with requirements of statutory agencies, authorities and the needs of the services. No change to existing accounting procedures may be made without prior consultation with the Director of Finance & Corporate Services.
- 3.9.2 The Director of Finance & Corporate Services or the Finance Manager must examine and certify where required any submission or claim for payment of grant by a Government Department or funding from any other body. Officers responsible for the administration of such grants, funds and spending associated with them must ensure compliance with the conditions of the grant/funding.
- 3.9.3 All formal accounts and accounting records shall be compiled under the direction of the Director of Finance & Corporate Services.

FINANCIAL PLANNING & CONTROL OF EXPENDITURE

- 4.1.1 Sound budget management is crucial to informing good decision making and achieving best value in the use of our resources.

BUDGET PREPARATION

- 4.2.1 The budget must be prepared in a form agreed by the Board and must be in line with our Strategic Goals and Business Plan. When the budget is presented to the Board it will come with recommendations from the Development & Finance Committee on its acceptability and on its impact on overall finances.
- 4.2.2 The budget is to be prepared according to the requirements defined in the detailed financial procedures. Once approved, the budget is to be used as the basis for authority to incur expenditure and for comparison with actual monthly and quarterly results. The approval for each officer to incur expenditure is defined in the detailed financial procedures and may be amended from time to time by the Board.
- 4.2.3 When the budget has been approved, the Director of Finance & Corporate Services shall allocate various amounts to delegated budget managers, in accordance with their responsibilities, and shall notify such employees of the budgeted amounts. All references to individual responsibilities within these Financial Regulations assume that authority is restricted to these amounts.
- 4.2.4 The Director of Finance & Corporate Services will prepare and present budgets to the Board for:
- a) Income & Expenditure
 - b) Investment
 - c) Development
 - d) Non-Housing investment
- 4.2.5 The introduction of new items after the Budget has been approved (where such items exceed the virement delegation in place for directors at Appendix 3) requires the advance approval of the Board.
- 4.2.6 The Board must approve any slippage greater than 12 months for Investment and Development.

BUDGETARY CONTROL

- 4.3.1 Significant variations in actual income and expenditure against budget are to be reported and explained at each meeting of the Board by the Director of Finance & Corporate Services. Any variations will be explained and reflected in the forecast out-turn presented to the Board.
- 4.3.2 The inclusion of items in approved budgets or investment programmes shall constitute authority to incur such expenditure (within delegations as outlined in the Standing Orders & Financial Authorities) unless the Board shall have placed a reservation on any such item or items. Expenditure on any such reserved items may be incurred only when and to the extent that such reservation has been removed. Such reservations shall only be removed when the Board has approved full details and costs of the item.
- 4.3.3 Budget managers are responsible for ensuring that expenditure does not exceed the allocated budget and must identify pressures on their own budgets at a stage which allows the position to be addressed (i.e. during the financial year rather than at the end). Budget holders must not authorise expenditure which will create or increase an overspend on that budget.
- 4.3.4 When considering the adoption of a new policy or a variation to an existing policy, the Board must ensure it is fully apprised of the costs involved. Heads of Service are responsible for ensuring that the Board are provided with all cost information pertinent to the policy.
- 4.3.5 Significant budget variations should be reported to the Director of Finance & Corporate Services by the relevant budget manager. Anticipated variations should be incorporated in the reporting process. It is the responsibility of Heads of Service to provide timely, accurate and reasonable explanations for variances to be included in the month end management report.
- 4.3.6 With regard to Investment and Development programmes, actual spend will be monitored against budget and reported at each meeting of the Board as part of the regular management accounts report.
- 4.3.7 Actual and forecast expenditure and progress on tender awards and projects within the Investment and Development programme will be reported to the Board. Detailed reports including post development completion reports will be provided to the Development & Finance Committee.
- 4.3.8 The Director of Finance & Corporate Services will prepare a year end report on performance against budget and make recommendations to the Board on any budgets which should be carried forward into the next financial year.

BORROWING

- 4.4.1 It is the responsibility of the Director of Finance & Corporate Services to provide the Board with a written report on affordable levels of borrowing. The Treasury Management Policy requires an Annual Financing Strategy to be prepared before the end of the financial year.

RESERVES

- 4.5.1 It is the responsibility of the Director of Finance & Corporate Services to provide the Board with a written report on the levels of reserves that are considered prudent. This advice is to be based on an annual risk assessment of the Partnership.

VIREMENTS

- 4.6.1 Where a virement represents a major change in policy or exceeds the delegation levels outlined at Appendix 3, the Head of Service needs to prepare a report for the Board to seek approval for the policy change and the associated virement.
- 4.6.2 Where a virement involves an adjustment to Salary budgets, the Head of Service needs to seek approval from the Chief Executive before being processed.
- 4.6.3 For development projects, virements which allocate budget within the project will not require to be approved by Board as there is no change being made to the total budget.
- 4.6.4 All other virements should be approved by the Head of Service and forwarded to the Finance Manager using the approved Virement Form with the appropriate approvals required.
- 4.6.5 Virements should be prepared timely and in advance of any committed spend. It is noted that some virements are reactive e.g., following a large insurance type event. In these circumstances, virements should be requested as soon as the budget manager becomes aware of the need to amend budget and, where appropriate, be presented for approval at the next meeting of the Board.
- 4.6.6 The Director of Finance & Corporate Services (or in his absence the Chief Executive) shall have the authority to approve virements to an amount as specified in the detailed financial procedures.

RISK MANAGEMENT & CONTROL OF RESOURCES

- 5.1.1 The Board is responsible for approving our Risk Management Strategy, the Audit and Risk committee is responsible for reviewing the overall effectiveness of the strategy.
- 5.1.2 The Chief Executive, in conjunction with Directors is responsible for preparing the risk management policy statement and for promoting it throughout the organisation and updating it.
- 5.1.3 The general controls for risk management are:-
- Procedures are in place to identify, assess, prevent or contain material known risks and these procedures are operating effectively throughout the organisation;
 - A monitoring process is in place to review the effectiveness of risk reduction strategies and the operation of these controls;
 - Managers know which risks they are responsible for managing and are provided with relevant information;
 - Provision is made for any losses that might result from the risks that remain;
 - Claims are investigated within a given time scale;
 - Acceptable levels of risk are determined and insured against where appropriate;
 - Business continuity plans are in place in the event of a disaster that results in significant loss or damage to our resources.

INTERNAL CONTROL

- 5.2.1 Internal control refers to the systems of control devised by management to help ensure our objectives are achieved in a manner that promotes economical, efficient and effective use of resources and that our assets and interests are safeguarded.

SYSTEMS OF INTERNAL CONTROL

- 5.3.1 The Director of Finance & Corporate Services is responsible for advising and implementing on effective systems of internal control. These arrangements need to ensure compliance with all applicable statutes and regulations, and other relevant statements of best practice.
- 5.3.2 The Director of Finance & Corporate Services will prepare an annual statement on the effectiveness of the Partnership's system of internal control. The statement will be published as part of the Annual Statement of Accounts and will be approved by the Audit Committee.

SEGREGATION OF DUTIES

5.4.1 To ensure proper segregation of duties exist:

- a) the duties of providing information about money due to or from HHP and of calculating, checking and recording these sums shall be separated as completely as possible from the duty of collecting or paying them;
- b) Officers charged with the duty of examining and checking the accounts of cash transactions must not themselves be engaged in any of these transactions.

YEAR END AND RETENTION OF RECORDS

5.5.1 HHP's financial year shall be from 1 April to 31 March.

5.5.2 Accounting and other records must be retained for periods that comply with relevant legal requirements and the detailed standards in Paragraph 5.5.3.

5.5.3 Records must be retained for periods specified by Internal Audit, which will ensure the Partnership's compliance with VAT and other law. The following periods provide a broad indication only:

- All records associated with grant funding and the transfer agreement must be retained for longer periods if required by the funding body;
- Expenditure record (e.g. orders, invoices) should be retained for 5 years plus the current year;
- Income records (receipts, debtors' invoices) should generally be retained for 6 years plus the current year.

TREASURY MANAGEMENT (INVESTMENT & BORROWINGS)

5.6.1 The Board adopts the key recommendations of CIPFA's Treasury Management in the Public Services: Code of Practice (the Code), as described in Section 4 of that Code.

5.6.2 Accordingly, the Board will create and maintain, as the cornerstones for effective treasury management:

- a treasury management policy statement, stating the policies and objectives of its treasury management activities;

Suitable treasury management practices (TMPs), setting out the manner in which the organisation will seek to achieve those policies and objectives, and prescribing how it will manage and control those activities.

5.6.3 The content of the policy statement and TMPs will follow the recommendations contained in Sections 6 and 7 of the Code, subject only to amendment where necessary to reflect the particular circumstances of this organisation. Such amendments will not result in the organisation materially deviating from the Code's key recommendations.

- 5.6.4 The Board will receive reports on its treasury management policies, practices and activities, including, as a minimum, an annual strategy and plan in advance of the year, and an annual report after its close, in the form prescribed in its TMPs.
- 5.6.5 The Board delegates responsibility for the execution and administration of treasury management decisions to the Director of Finance & Corporate Services who will act in accordance with the organisation's policy statement and TMPs and, if the Director of Finance & Corporate Services is a CIPFA member, CIPFA's Standard of Professional Practice on Treasury Management

INSURANCE

- 5.7.1 The Corporate Resources Manager must effect all insurance cover and negotiate all claims (within their delegation) in consultation with other Officers where necessary.
- 5.7.2 Each Head of Service shall ensure prompt notification to the Corporate Resources Manager of all new risks, properties, or vehicles which require to be insured and of any alterations affecting existing insurance policies.
- 5.7.3 Each Head of Service shall ensure that they notify the Corporate Resources Manager of any loss, liability or damage or any event likely to lead to a claim; and in instances of criminality, inform the Police and obtain the relevant crime reference number, unless otherwise decided by an identified officer.
- 5.7.4 All appropriate officers of the Partnership must be included in a suitable fidelity guarantee insurance policy.
- 5.7.5 The Director of Finance & Corporate Services must annually, or at any such lesser period as he may consider necessary, review all insurances and report to the Board in consultation with other Heads of Service as appropriate.

SECURITY PROCEDURES

- 5.8.1 Each Head of Service is responsible for maintaining proper security at all times for all buildings, stock, stores, furniture, equipment, cash, etc. under his control. He must consult the Chief Executive in any case where security is thought to be defective or where it is considered that special security arrangements may be needed.
- 5.8.2 Maximum limits for cash holdings must be agreed with the Director of Finance & Corporate Services and shall not be exceeded without his express permission.
- 5.8.3 Keys to safes or other similar containers are securely stored in a locked drawer; the loss of any such keys must be reported to the Director of Finance & Corporate Services forthwith. Keys must not be passed to any Officer who is not authorised to access the safe.

PAYMENTS & BENEFITS

- 5.9.1 All financial activities conducted by the organisation will conform to the requirements of the Entitlements, Payments and Benefits Policy which restricts

the types of direct and indirect financial benefits which may be awarded to employees and Board members and describes the actions which must be taken in the event of a potential breach.

- 5.9.2 All Officers and Board members should be aware of the requirements of the Entitlements, Payments and Benefits Policy and further information or advice can be provided on request by the Director of Finance & Corporate Services.
- 5.9.3 The basic requirements of the Policy are that a registered social landlord must not make a payment or grant a benefit to an officer or employee (current) of the landlord; a person who has been an officer or employee within the last 12 months (recent); a close relative of an officer or employee (current or recent); a business trading for profit of which a person falling within one of the previous categories is a principal proprietor or in the management of which such a person is directly concerned, except in the following cases:
- a) payments made or benefits granted to an officer or employee under a contract of employment;
 - b) payment of expenses to an officer who does not have a contract of employment;
 - c) where a tenancy has been granted to a person who later became an officer or employee of the organisation (or a close relative thereof), the grant to that tenant of a new tenancy for the same or another house; or
 - d) payments made or benefits granted with the approval of Scottish Ministers.
- 5.9.4 Any issues which may give rise to a breach or potential breach of the requirements of policy should be reported to the Chief Executive (or their depute in their absence) immediately.
- 5.9.10 Heads of Service may approve overtime working, in consultation with the Chief Executive for Grades A to E. The Chief Executive will approve overtime working for Grades F to H.
- 5.9.11 Overtime must be authorised in advance and will only be paid in exceptional circumstances.

EXTERNAL AUDIT

- 5.10.1 We will appoint external auditors as required by statute, and in a way consistent with the requirements of the current guidance issued by the Scottish Housing Regulator.
- 5.10.2 Preparation of annual accounts is to commence immediately after the end of each financial year and draft accounts are to be prepared for consideration by the auditors and by the Board no later than three months after the year-end.
- 5.10.3 The Director of Finance & Corporate Services is responsible for drawing up a timetable for final accounts purposes which will be agreed with the auditors.

- 5.10.4 The draft accounts and audit management letter will be reviewed by the Audit and Risk Committee. On their recommendation, the draft accounts will be submitted to the Board for approval, and subsequently for adoption at the Annual General Meeting.
- 5.10.5 Final audited and signed accounts are to be submitted to the Scottish Housing Regulator within the timescales set by the regulator.
- 5.10.6 The external auditors should be given the opportunity, at least once each year, to meet the Audit and Risk Committee without any officials being present, to discuss issues that may have arisen during their work or highlight areas of concern.
- 5.10.7 Each year, the Audit and Risk Committee will review the effectiveness of external audit and, provided the External Auditor's work is of a sufficiently high standard and reasonably priced, the Committee shall recommend that they be re-appointed at the Partnership's AGM. In addition, the Audit and Risk Committee will carry out a comprehensive review of the service provided every three years. A competitive tendering exercise will be held at least every seven years for the appointment of an External Auditor for the Partnership.

INTERNAL AUDIT

- 5.11.1 There will also be an internal audit function, under the independent control and direction of the Director of Finance & Corporate Services which shall be arranged to carry out a continuous examination of financial and other operations. An annual programme of work will be set by the Director of Finance & Corporate Services in consultation with the Chief Executive and other Directors and approved or otherwise amended by the Audit and Risk Committee.
- 5.11.2 The Internal Auditor will report to the Director of Finance & Corporate Services and the Audit and Risk Committee.
- 5.11.3 The internal audit service remains independent in its planning and operation and has direct access to the Board, the Chief Executive and the Chair of the Audit and Risk Committee.
- 5.11.4 The Chief Executive, the Director of Finance & Corporate Services or their authorised representatives and the external and internal auditors shall have authority to:
- a) enter at all reasonable times any Partnership premises or land;
 - b) access all records, documents and correspondence relating to any financial and other transactions of the Partnership;
 - c) require and receive such explanations as are necessary concerning any matter under examination; and
 - d) require any employee of the Partnership to produce cash, stores or any other Partnership property under his/her control.

5.11.5 Whenever any matter arises which involves, or is thought to involve, irregularities of fraud concerning cash, stores or other property of the Partnership or there is any other suspected irregularity in the exercise of the activities of the Partnership, the manager concerned shall notify the Director of Finance & Corporate Services, in accordance with the Partnership's Fraud policy. The Director of Finance & Corporate Services will take such steps as necessary by way of investigation, the involvement of internal audit and reporting the matter to the regulatory body where required. The Board shall also ensure that a procedure for whistle blowing is in place and operating effectively.

5.11.6 If the suspected irregularity potentially involves:

- a) the Director of Finance & Corporate Services or the Director of Operations, the Chief Executive shall be informed; or
- b) The Chief Executive, the Chair of the Audit and Risk Committee, or failing that the Chair of the Board shall be informed.

SYSTEMS & PROCEDURES

GENERAL CONTROLS

- 6.1 The general controls for systems and procedures are:
- a) Performance is communicated to the appropriate managers on accurate, complete and timely basis;
 - b) Early warning is provided on deviations from targets, plans and budgets and management action is taken; and
 - c) Operating systems and procedures are secure.

EXPENDITURE

Purchasing Arrangements

- 6.2.1 Delegated Budget Managers must ensure and be able to demonstrate that the Partnership obtains value for money in purchasing activity and that purchasing accords with service priorities.
- 6.2.2 The most effective purchasing arrangements should be used. In case of routine purchasing this should be undertaken through the Corporate Resources Team except:
- a) transactions excluded by agreement with the Director of Finance & Corporate Services and the Delegated Budget Manager concerned; or
 - b) small items which may be purchased through petty cash.
- 6.2.3 Where any purchasing or services involves tendering or contracts these arrangements must conform to the requirements set out in the procurement policy.
- 6.2.4 The Finance Manager must ensure that e-business/purchasing processes maintain the security and integrity for transacting business electronically and must approve the introduction of such systems.

Orders of Work, Goods and Services

- 6.2.5 All orders, requests for works, instructions to vary works contracts or to vary individual orders, and the entering into of contracts, must be carried out according to the detailed requirements of the procurement policy. The procurement policy is available on our intranet/SharePoint to all employees.
- 6.2.6 Official orders must be in a form approved by the Director of Finance & Corporate Services and must be signed or otherwise authorised only by approved officers.

6.2.7 Official orders must be issued for all work, goods or services to be supplied to HHP except for:

- supplies of public utility services;
- for periodical payments such as rent or rates;
- for payments set by statute or other regulations (including home loss and disturbance payments);
- for petty cash purchases; or
- such other exceptions as the Director of Finance & Corporate Services may approve in advance.

Any verbal orders issued in an emergency must be confirmed by an official order by the next working day. A copy of each order must be retained for audit purposes.

6.2.8 Employees of the Partnership are not allowed to purchase goods privately under any Partnership arrangements or solicit preferential treatment in a private capacity from the Partnership's suppliers.

Orders under Procurement (Other Services)

6.2.9 One written quotation must be requested for individual orders up to an amount up to £1,999.99. The details of the quotation must be documented and held on file.

6.2.10 Two written quotations must be requested for individual orders which are estimated to be in the region of £2,000-£24,999.99. If a quotation other than the lowest is accepted, a written report must be made to the next meeting of the Board justifying this course of action. Where orders are awarded on a combined quality and price assessment, it is understood that the lowest price may not always be the one which will be accepted, and this will not need to be presented to Board.

6.2.11 Results of tenders should be referred to the Board or one of its committees. This regulation does not apply to the renewal of annual maintenance agreements previously agreed by the Board.

Orders under Procurement (Building Works)

6.2.12 All investment works are subject to a robust tender process with tenders for lots being returned as per the Board approved Investment Framework.

6.2.13 Repairs & Maintenance works are outsourced to a repairs contractor. The appointment of the contractor follows a robust, full tender process and the Board is regularly updated as to the performance of the contractor against agreed contractual performance targets.

6.2.14 The methods of procurement and appropriate limits for development contracts and consultants are outlined in our procurement policy.

Orders under Procurement Frameworks

- 6.2.15 Framework agreements may also be used to procure contractors and suppliers without committing or binding us to any specific expenditure.

General

- 6.2.16 No Officer may use the Partnership or its stationery to order goods and/or services intended for their private and personal use except in circumstances approved in advance and in writing by the Chief Executive.

Contracts

- 6.2.17 Where contracts provide for payment to be made by instalments, the Budget Manager will ensure that an approved purchase order is in place to reflect the staging of payments on each contract between the Partnership and the contractor.
- 6.2.18 Payments to contractors on account of contracts shall be made only in accordance with agreed expenditure authorisation procedures.
- 6.2.19 Subject to the provisions of investment/development contracts, in each case every variation shall be authorised in writing by the:
- a) Director of Operations or any other officer nominated by him in writing for the purpose; or
 - b) consultant engaged by the Partnership when an outside consultant is appointed.
- 6.2.20 Any such variation shall be reported to the Board on a quarterly basis. If the variation creates an overspend, the procedure in relation to authorising overspends must be followed (see paragraph 4.3.2).
- 6.2.21 The final certificates of completion of any contract shall not be issued until the external consultant has produced to the Director of Operations, or Development Manager, a detailed statement of account and all relevant documents required.
- 6.2.22 Where completion of a contract is delayed beyond the contract period, it shall be the duty of the Director of Operations to consider and, where appropriate, to take action in respect of any claim for liquidated damages.
- 6.2.23 All officers and consultants shall have regard to the requirements of the relevant regulatory body and government departments in respect of matters relating to such contracts.

Payments of Accounts

- 6.3.1 The procedures for making all payments shall be in a form specified by the Director of Finance & Corporate Services.
- 6.3.2 Apart from petty cash and other payments from advance accounts, the normal method of payment of money due from the Partnership must be by cheque, electronic payment (Bankline or Credit Card), BACS or CHAPS

transfers drawn on the Partnership's bank account by signatories duly authorised by the Board.

- 6.3.3 The names of Officers authorised to sign orders and invoices will be maintained in a register along with a specimen signature by the Director of Finance & Corporate Services. Any changes to the register must be requested in writing. Employees authorised to issue an order are responsible for examining, verifying and certifying the related invoice(s) and similarly for any other payment vouchers or accounts arising from his/her department. Such certification must be in writing by the Officer.
- 6.3.4 Payment will only be made by the Director of Finance & Corporate Services against invoices which have been certified for payment by the appropriate head of department or budget holder. Certification of an invoice should involve at least two officers in the process and will ensure that:
- a) the goods have been received, examined and approved with regard to quality and quantity, or that services rendered or work done is satisfactory;
 - b) where appropriate, it is matched to the order;
 - c) invoice details (quantity, price, discount) are correct;
 - d) the invoice is arithmetically correct;
 - e) the invoice has not previously been passed for payment;
 - f) where appropriate, an entry has been made on a stores record or departmental inventory;
 - g) VAT issues have been complied with where they apply; and
- appropriate coding advice is provided. This coding advice must be one of the codes included in the budget holder's area of responsibility and must correspond with the types of goods or service described on the invoice.
- 6.3.5 Once accounts have been correctly certified, they must be passed promptly to the Director of Finance & Corporate Services who must examine them to the extent that he considers necessary, for which purpose the Director of Finance & Corporate Services is entitled to make such enquiries and to receive such information and explanations as he may require.
- 6.3.6 The Chief Executive and each Director must, six weeks after the financial year end, agree with the Director of Finance & Corporate Services all outstanding expenditure in relation to the previous financial year.
- 6.3.7 Responsibility for the authorisation of an account lies ultimately with the Officer who signs the payment authorisation. The Officers who have the authority to approve payment for either goods or services within the approved revenue budget are specified in the detailed financial procedures.

- 6.3.8 Cheque or Banks Automated Clearing System (BACS) payments – all invoices should be paid within agreed payment terms and such terms are recorded in our Finance System against each supplier. The general rule is that properly authorised invoices are paid once goods have been certified as received and no later than 30 days of receipt by the Finance Department. This is subject to variations as agreed with the individual supplier of goods and services and as set out in the Partnership's detailed financial procedures.
- 6.3.9 No individual or employee of the Partnership shall act as the first signatory or certify transactions for any payments to themselves or their immediate families or to their companies or companies of their immediate families.
- 6.3.10 The use of direct debits as a payment method requires the prior approval of the Director of Finance & Corporate Services or Finance Manager.
- 6.3.11 Officers of the Partnership must not prepare supplier's invoices. If it is necessary for an officer to amend an invoice, that fact and the reason therefore shall be shown on the invoice and the amendment must conform to the Value Added Tax regulations.
- 6.3.12 Override procedure - If a payment has to be made more quickly than the general rule and is not covered by the exceptions, then the date of payment must be marked on the certified invoice and addressed to the Resources Department duly marked for special treatment.

Petty Cash

- 6.4.1 Petty cash will be controlled through the Imprest system. Detailed guidance will be issued by the Financial Accountant and is contained in the Partnership's financial procedures.
- 6.4.2 At the end of the financial year, a certificate of the balances held should be completed by the member of employees responsible for the float and countersigned by the head of department.

Company Credit Cards

- 6.5.1 The Director of Finance & Corporate Services will make arrangements for the administration of "company credit cards" and will issue them where the circumstances require.
- 6.5.2 Directors are responsible for ensuring that "company" credit cards used in their Department are only held by appropriate employees and are used strictly in compliance with the specific guidance issued by the Director of Finance & Corporate Services.

Expenditure Authorisations

- 6.6.1 The Board has approved the following procedures for the authorisation of expenditure commitments and invoices for payment. Levels of authority range from department employees to the Board, and it is important for good internal control of the Partnership's expenditure that all employees have a working knowledge of the content. It is the responsibility of each Director to ensure that

all of their employees affected are fully aware of their own authority levels and limits.

6.6.2 The following important points shall be observed in the authorisation procedure and followed carefully:

- a) three separate procedures involved in incurring expenditure:
 - Taking on the commitment to spend;
 - Approving the invoice after goods or services received;
 - The actual transfer of funds to creditors.
- b) evidence of approval and authority must be kept.
- c) the person approving the invoice will be expected to be satisfied that prior approval of the original order or instruction was given, at the appropriate level, in cases where such prior approval is required.
- d) payments to suppliers, etc. will not be made if substantiated only by statements. If an invoice has been mislaid, a copy must be obtained from the supplier.
- e) the cost code must be in accordance with the approved budget heading and not changed because another original budget head is being used in order to "vire" expenditure.
- f) approval of invoices must include a check of the calculations.

6.6.3 The Director of Finance & Corporate Services shall maintain a register of authorised signatories including limits. Any changes to the authorities to sign must be notified to the Director of Finance & Corporate Services immediately. Heads of Service must supply the Director of Finance & Corporate Services with specimen signatures of those authorised to certify invoices for payment.

6.6.4 Where changes to the authorisation schedule are required ahead of the annual review of financial regulations and procedures, the Director of Finance & Corporate Services shall instruct, or confirm, changes in writing to Heads of Service, and other appropriate employees and Board Members.

6.6.5 Authorisations can be obtained through e-signatures, e-mail, system authorisations or physical signatures in accordance with the delegations permitted in the Financial Authorisations.

INCOME & BANKING

Banking Arrangements

- 6.7.1 The Board is responsible for the appointment of our bankers. Should there be an occasion where the banking arrangements are deemed to no longer meet our requirements, the Board shall be provided with a report outlining why this is the case and banking services will be re-tendered through a competitive tendering process.
- 6.7.2 Bank accounts held by HHP are specified in the detailed financial procedures. Only the Director of Finance & Corporate Services may open or close a bank account for dealing with HHP's funds. All bank accounts shall be in the name of "Hebridean Housing Partnership" or its Subsidiary "HHP Community Housing". The Finance Manager is responsible for ensuring that all bank accounts are subject to regular reconciliation and independent review and that large or unusual items are investigated as appropriate.
- 6.7.3 All arrangements with HHP's bankers shall be made by or under arrangements approved by the Director of Finance & Corporate Services, who shall be authorised to operate such banking accounts, as he may consider necessary.
- 6.7.4 All cheques, electronic payments (Bankline or Credit Card), BACS or CHAPS shall be ordered only on the authority of the Director of Finance & Corporate Services who shall make proper arrangements for their safe custody. Cheques on HHP's banking accounts shall bear the signature of identified Officers or Board Members as authorised by the Board. Details of authorised persons and the Partnership's cheque mandate can be found in the Partnership's detailed financial procedures.

Income

- 6.8.1 The Board is responsible for approving the level of rents, lettings and other charges, as determined by procedures approved by the Finance & Development Committee.
- 6.8.2 The collection of money due shall be under the supervision of the appropriate Director within procedures defined by the Director of Finance & Corporate Services. The relevant Director will ensure that the procedures are followed and that adequate arrangements are in place to ensure safe custody of monies to our premises or bankers.
- 6.8.3 All Officers shall furnish the Finance Manager with such particulars in connection with work done, goods supplied or services rendered and of all other amounts due as may be required by them to record correctly all sums due and to ensure that accounts are rendered within seven days for the recovery of income due.
- 6.8.4 Safeguards against loss of income are in place as follows:
 - a) prompt claiming of all Local Authority, Scottish Government or other public body grants, subsidies and allowances;

- b) prompt reviews of rent. Increases must be implemented at the appropriate time, as agreed by the Board;
 - c) prompt action against all debtors and the institution of recovery proceedings, except where the contrary is approved by the Board, or in case of rent and tenants' charges, by the Director of Operations;
 - d) comprehensive accounting procedure and internal controls for all income sources;
 - e) appropriate investment in stock to ensure minimal rent loss through voids.
- 6.8.5 All receipt forms, books, tickets and other such items shall be ordered and supplied by the Finance Manager, who shall approve the arrangements for their control.
- 6.8.6 All money received by an employee on behalf of HHP shall, without delay, be paid to the Director of Finance & Corporate Services or, as he may direct, to the appropriate bank account or transmitted directly to any other body or person entitled thereto. No deduction may be made from such money except to the extent that the Director of Finance & Corporate Services may specifically authorise. Each employee who so banks money shall enter on the paying-in slip a reference to the related debt. The detailed financial procedures set out the exact procedures to be followed with regard to the receipt of cash, cheques and postal orders.
- 6.8.7 Every transfer of money from one employee to another will be evidenced in the records by the signature of the receiving employee.
- 6.8.8 Any income due shall only be written off as a bad debt under procedures outlined in our Debt Management policy.
- 6.8.9 Donations of cash or other items must be recorded and a written acknowledgement sent to the donor by the Chief Executive.
- 6.8.10 All incoming post shall be opened in the presence of two members of employees and any remittances shall be recorded in a register. This register shall be done monthly and independently checked to bankings. All income shall be banked weekly unless the cash held in the safe will exceed £4,000 and receipts given for all payments by cash or postal order.
- 6.8.11 Personal cheques must not be cashed nor must IOUs be accepted out of monies held on behalf of the Partnership.
- 6.8.12 The Finance Manager shall ensure that:
 - a) debtors' invoices are raised promptly in respect of income due to us;
 - b) debtors' accounts are raised on official invoices;
 - c) swift and effective action is taken to collect overdue debts in accordance with formal procedures (detailed in the financial procedures):

d) outstanding debts are monitored and reports are prepared for managers.

6.8.13 A limit is imposed on the cash amount received in settlement for the payment for goods and services of £5,000 in any one transaction. This limit is required to ensure that the Partnership complies with the Money Laundering Regulations.

6.8.14 The Director of Finance & Corporate Services is responsible for implementing credit arrangements and indicating a period in which different types of invoices must be paid, and for implementing procedures and instructions for the allocation of sums received to individual constituent elements of tenants' rent accounts.

Control of Cash, Stock, etc.

6.9.1 Cash floats and balances kept by us are specified in the detailed financial procedures. All such floats must be maintained on the Imprest system and reimbursement will be authorised by the Financial Manager.

6.9.2 We will maintain inventories of various items as defined in the detailed financial procedures.

6.9.3 A register of documents of title (deeds, share certificates, building society books, etc.) must be kept and the documents stored in a secure place such as a locked safe. Access to the documents will be restricted to the Chief Executive, Director of Finance & Corporate Services, Governance Officer, Auditors and the Partnership's solicitors.

6.9.4 Computer records shall be maintained in line with the Partnership's Information and Communication Technology Policy [ICT] to ensure information held on personal computers and servers is secure. Backups must be stored securely off site.

Writing off Irrecoverable Items of Income

6.9.5 HHP will write off all established bad debts as soon as possible in order not to distort the rent arrears and other bad debts position. Consideration must be given as to whether or not the present abode of former tenants in arrears is known to establish whether the doubtful debts are collectable or not.

6.9.6 Before any income is written off in the financial records, the approval of the Director of Finance & Corporate Services must be obtained for write-offs up to an agreed amount as specified in the detailed financial procedures and the approval of the Board for all write-offs above the agreed amount. Any write-offs must be made in accordance with the authorisation levels specified in the detailed financial procedures.

6.9.7 Records of debts written off in the financial records will be retained by the Director of Finance & Corporate Services for a period of not less than ten years, for use in the event of a debt becoming recoverable again in the future.

SALARIES AND WAGES

Salaries, Wages and Pensions

- 6.10.1 Salaries paid to permanent employees must be on the basis of the appointment as agreed by the Board.
- 6.10.2 All employees are paid on a set day each month as specified in the Partnership's Terms and Conditions of Employment.
- 6.10.3 All payments shall be made by the Director of Finance & Corporate Services.
- 6.10.4 Appointment of all employees must be made in accordance with the regulations of the Partnership and the approved establishments, grades and rates of pay.
- 6.10.5 All partnership employees will be appointed to the salary scales approved by the Board and in accordance with appropriate conditions of service.
- 6.10.6 All-time records and other pay documents must be in a form prescribed or approved by the Director of Finance & Corporate Services.
- 6.10.7 Each Head of Service is responsible for ensuring that the Director of Finance & Corporate Services and the Chief Executive's Personal Assistant are notified as soon as possible and in the form prescribed by them, of all matters affecting the payment of such benefits, and in particular:
 - a) appointments, resignations, dismissals, suspensions, secondments and transfers;
 - b) absences from duty for sickness or other reason, apart from approved leave;
 - c) changes in remuneration, other than normal increments, and pay awards and arrangements of general application;
 - d) information necessary to maintain records of service for superannuation, income tax, national insurance, etc.
- 6.10.8 All casual and part-time employees must be included on the payroll.
- 6.10.9 Overtime and temporary recruitment of employees must be approved as prescribed in the expenditure authorisations schedule.
- 6.10.10 The Director of Finance & Corporate Services is responsible for keeping all records relating to payroll including those of a statutory nature. Administration of payroll process will be carried out by a member of the Finance Team with the Director of Finance & Corporate Services carrying out verification checks.

Travel and Subsistence

- 6.11.1 All claims for payment of mileage allowances, subsistence allowances, travelling and incidental expenses must be submitted, duly certified by a Head

of Service in a form approved by the Director of Finance & Corporate Services, to him.

- 6.11.2 The certification by the Head of Service shall be taken to mean that the certifying Officer is satisfied that the journeys were authorised, the expenses properly and necessarily incurred and that the allowances are properly payable by the Partnership.

TAXATION

- 6.12.1 Compliance with taxation rules is important for the Partnership to meet its legal requirements and avoid unnecessary costs. Failure to comply with tax legislation can result in penalties and interest payments or may lead to the overpayment or under-recovery of taxes.
- 6.12.2 Heads of Service must ensure all employees are aware of the various tax regimes that impact on their areas of operational activity and ensure they are compliant with legislation governing tax and the detailed standards below.

VAT standards

- 6.12.3 Officers should be aware of the Partnership's VAT guidance, available from the Finance Manager and where to access primary reference documents for VAT related matters.
- 6.12.4 VAT must be paid and recovered within the time constraints laid down by H.M. Revenue and Customs.
- 6.12.5 Officers are responsible for obtaining and issuing proper tax documents (e.g. invoices, receipts) to ensure compliance with VAT law and to facilitate full recovery on expenditure.

Other Tax Standards

- 6.12.6 Guidance on taxation matters, other than VAT will be issued from time to time by the Director of Finance & Corporate Services.
- 6.12.7 Officers responsible for issuing or payment of invoices must give consideration to the impact of various taxes. Particular attention should be paid to the correct treatment of employment taxes and VAT
- 6.12.8 In instances of doubt over the correct treatment of taxation officers should consult the appropriate employees of the Resources Department
- a) PAYE and National Insurance - Director of Finance & Corporate Services
 - b) VAT and other taxation - Financial Manager or Director of Finance & Corporate Services

FIXED ASSETS

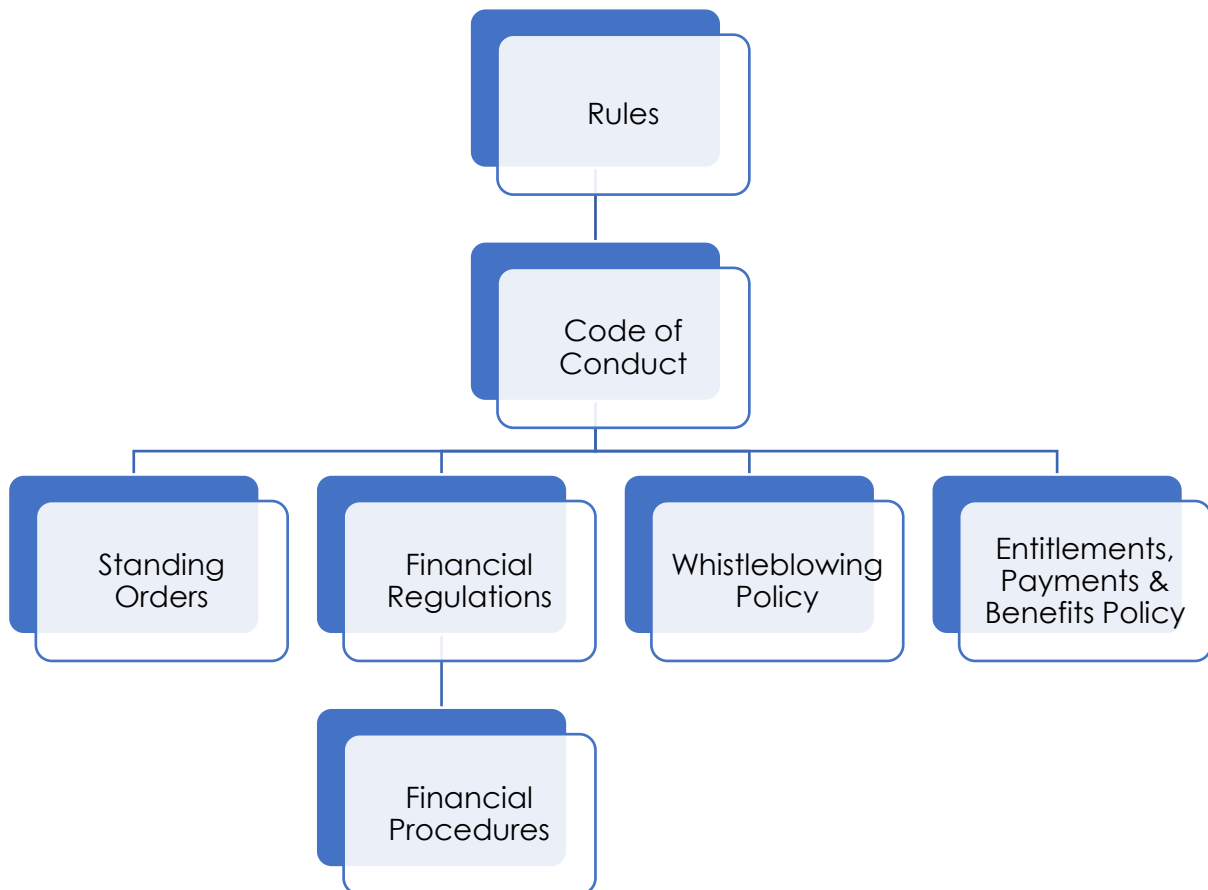
Fixed Asset Register

- 6.13.1 A fixed asset register shall be maintained, recording an adequate description of furniture, fittings and equipment, plant and machinery and other capital equipment owned by the Partnership, and the form in which the fixed asset register shall be kept shall be determined by the Director of Finance & Corporate Services. The Chief Executive and each Director will be responsible for items within their areas, with an updated copy being provided annually to the Director of Finance & Corporate Services in line with the closing of accounts timetable.
- 6.13.2 Each Head of Service shall be responsible to the Director of Finance & Corporate Services for maintaining an annual check of all items on the fixed asset register for taking action in relation to surpluses and deficiencies and noting in the fixed asset register accordingly. The Director of Finance & Corporate Services must be notified of these changes.
- 6.13.3 The Partnership's property must not be removed other than in the ordinary course of the Partnership's business or used other than for the Partnership's purposes except in accordance with specific directions issued by the Director concerned.
- 6.13.4 Equipment in housing schemes must be separately identified and recorded in the Asset Register.

Inventories

- 6.14.1 Inventories shall be maintained by the appropriate Director and Chief Executive, recording an adequate description of furniture, fittings and equipment, plant and machinery and other small items of equipment used up during developments. The form in which the inventories shall be kept shall be determined by the Director of Finance & Corporate Services.
- 6.14.2 Each Head of Service shall be responsible to the Director of Finance & Corporate Services for maintaining an annual check of all items on the inventory in line with the closing of accounts timetable, for taking action in relation to surplus or deficiencies and noting on the inventory accordingly.
- 6.14.3 The Partnership's property must not be removed from its normal location other than in accordance with the ordinary course of the Partnership's business or used other than for the Partnership's purposes except in accordance with specific directions issued by the Director concerned.
- 6.14.4 Each Head of Service must be responsible for the care and custody of the stocks and stores under his/her control, and for the maintenance of the relevant inventories.
- 6.14.5 Significant stock losses & losses on the disposal of components ahead of their natural replacement must be reported to the Board.
- 6.14.6 Scheme inventories must be separately identified and recorded.

RELATIONSHIP WITH CONSTITUTION



PROCUREMENT ARRANGEMENTS

The thresholds below are net of VAT and the GPA (Government Procurement Agreement) thresholds are updated every two years (shown as at 1st January 2026)

GOODS & SERVICES

Value Range	Procurement Journey
£0 – £1,999	1 written quotation
£2,000 – £24,999	2 written quotations
£25,000 – £50,000 (SRPT)	Route 1 (Quick Quote or Simplified PCS Tender)
£50,000 (SRPT) – £173,100 (GPAT)	Route 2 (Full PCS Tender)
Over £173,100 (GPAT)	Route 3 (Full PCS tender, bespoke contracts requiring enhanced governance)

WORKS

Value Range	Procurement Journey
£0 – £24,999	1 written quotation
£25,000 – £349,999	2 written quotations
£350,000 – £499,000	Quick Quote issued to min. 3 suppliers
£500,000 – £1,999,999 (SRPT)	Route 1 (Quick Quote or Simplified PCS Tender)
£2,000,000 – £4,327,500 (GPAT)	Route 2 (Full PCS Tender)
Over £4,327,500 (GPAT)	Route 3 (Full PCS tender, bespoke contracts requiring enhanced governance)

CONSTRUCTION

Value Range	Procurement Journey
£0 – £349,999	PCS Quick Quotes (CPR 1A)
£350,000 – £1,999,999 (SRPT)	PCS Tender Process (CPR 1B)
£2,000,000 – £4,327,500 (GPAT)	PCS Tender Process (CPR 2A)
Over £4,327,500 (GPAT)	PCS Tender Process (CPR 2B)

VIREMENTS

Overriding Principles:

- a) no virement should cause a breach of our financial covenants
- b) all overspends must be funded by savings or increased income

		Limit	Approved by
1)	Where an item of expenditure and associated income (E.g., Rent / Internal fees) has to be delayed for legitimate reasons that results in slippage of less than 12 months	None	Director of Finance & Corporate Services
2)	Saving or overspend on Supervision & Management budget (excluding depreciation, amortisation and year end pension actuarial adjustments)	£10,000	Budget Manager
		£20,000	Director of Finance & Corporate Services & Chief Executive
3)	Saving or overspend on a repairs & maintenance budget	£20,000	Budget Manager
		£50,000	Director of Operations or Director of Finance & Corporate Services
4)	Saving or overspend on investment, development or fixed asset budget	£50,000	Budget Manager
		£100,000	Director of Operations or Director of Finance & Corporate Services
5)	Savings or overspend on employee expenses	£5,000	Budget Manager
		£20,000	Chief Executive

- c) A list of virements over £50K will be reported to the Development and Finance Committee quarterly.

INTERPRETATIONS & ABBREVIATIONS

The following interpretations and abbreviations are used in this policy:

Word	Interpretation
Board	Means the Board of the Hebridean Housing Partnership
Board Members	All Members of the Board including co-opted Members
Chair	Chairperson of the Board of Management of the Partnership
Chief Executive	The Chief Executive of Partnership or anyone who is deputising for the Chief Executive.
Committee	A committee of the Partnership appointed by the Board shall have the same meaning as the term sub-committee used in the Rules. In the Standing Orders, the term committee shall include sub-committees unless the sense of the context indicates otherwise.
Scottish Housing Regulator	An independent regulator of RSLs and local authority housing services in Scotland established on 1 April 2011 under the Housing (Scotland) Act 2010.
Local Connection	Means having a main or principal residence or principal place of business or operation in the Outer Hebrides and having lived or operated in the Outer Hebrides for a period of three consecutive years.
Rules	The Rules of the Partnership incorporated under the Industrial and Provident Societies Acts and registered with the Financial Services Authority.
The Partnership	Hebridean Housing Partnership
Heads of Service	A Director, Head of Executive Office or the Chief Executive
Delegated Budget Manager	Member of employees with responsibility for managing specific budgets
Standing Orders	Standing Orders of the Partnership which detail how the business of the Partnership will be conducted in practice.
Significant Variation	Where actual cost/income differs to budget by greater than 10% and over £5K



HHP is a registered society under the Co-operative and Community Benefit Societies Act 2014, Registered Number: 2644R(S). Registered Office: Creed Court, Gleann Seileach Business Park, Willowglen Road, STORNOWAY, Isle of Lewis HS1 2QP. It is a charity registered in Scotland, Charity Number: SC035767, registered as Registered Social Landlord with the Scottish Housing Regulator, Registration Number: 359 and registered as a Property Factor, Registration Number PF000183

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