



SEATON TOWN COUNCIL

FINANCIAL REGULATIONS

1. General

- 1.1 These financial regulations govern the conduct of financial management by the Council and may only be amended or varied by resolution of the Council. Financial regulations are one of the council's governing policy documents providing procedural guidance for Councillors and Officers. Financial Regulations must be observed in conjunction with the council's standing orders, internal controls and any individual financial regulations relating to contracts.
- 1.2 The council is responsible in law for ensuring that its financial management is adequate and effective and that the council has a sound system of financial control which facilitates the effective exercise of the council's functions, including arrangements for the management of risk and for the prevention and detection of fraud and corruption. These financial regulations are designed to demonstrate how the council meets these responsibilities.
- 1.3 The council's accounting controls systems must include measures:
 - For the timely production of accounts;
 - That provide for the safe and efficient safeguarding of public money;
 - To prevent and detect inaccuracy and fraud; and
 - Identifying the duties of officers
- 1.4 These financial regulations demonstrate how the council meets these responsibilities and requirements.
- 1.5 At the first meeting of each new financial year, prior to approving the Annual Governance Statement, the council will review the effectiveness of its system of internal control which shall be in accordance with proper practices.
- 1.6 The Responsible Financial Officer (RFO) holds a statutory officer to be appointed by the Council. The Clerk has been appointed as the RFO for this council and these Regulations will apply accordingly.
- 1.7 Deliberate or wilful breach of these Regulations by an employee may give rise to disciplinary proceedings.
- 1.8 Members of the Council are expected to follow the instructions within these Regulations and not to entice employees to breach them. Failure to follow these Regulations brings the office of councillor into disrepute.

1.9 The RFO:

- Acts under the direction of the council;
- Administers the council's proper financial affairs in accordance with all Acts, Regulations and proper practices;
- Determines on behalf of the council its accounting records and accounting control systems;
- Ensures the accounting control systems are observed;
- Maintains the proper accounting records of the council up to date in accordance with proper practices;
- Assists the council to secure economy, efficiency and effectiveness in the use of its resources; and
- Produces financial management information as required by the council

1.10 The accounting records determined by the RFO shall be sufficient to show and explain the council's transactions and to enable the RFO to ensure that any income and expenditure account and statement of balances, or record of receipts and payments and additional information, as the case may be, or management information prepared for the Finance & General Purposes (F&GP) Committee and Council from time to time comply with the Accounts and Audit Regulations.

1.11 The accounting records determined by the RFO shall contain:

- Entries from day to day or all sums of money received and expended by the council and the matters to which the income and expenditure or receipts or payments accounts relate;
- A record of the assets and liabilities of the council; and
- Wherever relevant, a record of the council's income and expenditure in relation to claims made, or to be made, for any contribution, grant or subsidy.

1.12 The accounting control systems determined by the RFO shall include:

- Procedures to ensure that the financial transactions of the council are recorded as soon as reasonably practicable and as accurately and reasonably as possible;
- Procedures to enable the prevention and detection of inaccuracies and fraud and the ability to reconstruct any lost records;
- Identification of the duties of officers dealing with financial transactions and division of responsibilities of those officers in relation to significant transactions;
- Procedures to ensure that uncollectable amounts, including any bad debts are not submitted to the council for approval to be written off except with the approval of the RFO and that the approvals are shown in the accounting records; and
- Measures to ensure that risk is properly managed

1.13 The council is not empowered by these Regulations or otherwise to delegate certain specified decisions, in particular any decision regarding:

- Setting the final budget or the precept (council tax requirement);
- Approving accounting statements;

- Approving an Annual Governance Statement;
- Borrowing;
- Writing off of bad debts;
- Declaring eligibility for the General Power of Competence; and
- Addressing recommendations in any report from the internal or external auditors shall be a matter for the full council only

1.14 In addition the Council must:

- Determine and keep under regular review the bank mandate for all council bank accounts;
- Approve any grant or a single commitment in excess of £5,000; and
- In respect of the annual salary for any employee have regard to recommendations about annual salaries of employees made by the relevant committee in accordance with its terms of reference

1.15 In these financial regulations, references to the Accounts and Audit Regulations shall mean the Regulations issued under the provisions of section 27 of the Audit Commission Act 1998, or any superseding legislation, and then in force unless otherwise specified.

1.16 In these financial regulations the term 'proper practice' or 'proper practices' shall refer to guidance issued in Governance and Accountability for Local Councils (England) – a Practitioners' Guide published by the Joint Panel on Accountability and Governance (JPAG).

2. Annual Estimates (Budget) & Forward Planning

2.1 Each committee shall formulate and submit proposals to the F&GP Committee in respect of revenue and capital and sources of funding for the following financial year not later than the end of October each year. The Council will also have a 5-year financial forward plan which is updated each year at budget setting time.

2.2 Detailed estimates of all income and expenditure including the use of reserves and all sources of funding for the year shall be prepared each year by the RFO and chairman of the F&GP Committee in the form of a budget to be considered by the council.

2.3 The F&GP Committee shall review the budget and submit it to the council at the December meeting. The budget shall be approved by the Council at its January meeting each year. The council shall then fix the precept to be levied for the ensuing financial year. The RFO shall issue the precept to the billing authority and shall supply each member with a copy of the approved budget.

2.4 The approved annual budget shall form the basis of financial control for the ensuing year.

3. Budgetary Control & Authority to spend

- 3.1 Expenditure on revenue items may be authorised up to the amounts included for that class of expenditure in the approved budget. The authority is to be determined by:
- The council for all items over £5,000
 - A duly delegated committee of the council for items over £500; or
 - The Clerk, in conjunction with the Chairman of the Council or Chairman of the appropriate Committee, for any items below £500

Such authority is to be evidenced by a minute or by an authorisation slip duly signed by the Clerk, and where necessary also by the appropriate chairman.

Contracts may not be disaggregated to avoid the controls imposed by these regulations.

- 3.2 No expenditure may be authorised that will exceed the amount provided in the revenue budget for that class of expenditure other than by resolution of the council, or duly delegated committee. During the budget year and having considered fully the implications for public services, the F&GP committee may authorise the transfer of unspent and available amounts to other budget headings or to an earmarked reserve as appropriate ('virement').
- 3.3 The RFO shall monthly provide the F&GP committee with a statement of income and expenditure to date under each head of the budgets, comparing actual expenditure to the appropriate date against planned as shown in the budget. These statements are to be prepared and shall show explanations to material variances. For this purpose "material" shall be in excess of £100 or 15% of the budget.
- 3.4 The salary budgets are to be reviewed at least annually in October for the following financial year and such review shall be evidence by a hard copy schedule signed by the Clerk and the Personnel Committee. The RFO will inform the committee of any changes impacting on their budget requirement for the coming year in good time.
- 3.5 In cases of extreme risk to the delivery of council services, the Clerk may authorise revenue expenditure on behalf of the council which in the Clerk's judgement it is necessary to carry out. Such expenditure includes repair, replacement or other work whether or not there is budgetary provision for the expenditure, subject to a limit of £500. The Clerk shall report such action to the Chairman as soon as possible and will have a retrospective report to the F&GP Committee as soon as practicable thereafter.
- 3.6 No expenditure shall be authorised in relation to any capital project and no contract entered into or tender accepted involving capital expenditure unless the Council is satisfied that the necessary funds are available, or the requisite borrowing approval has been obtained.
- 3.7 All capital works shall be administered in accordance with the council's standing orders and financial regulations relating to contracts

3.8 Changes in earmarked reserves shall be approved by the F&GP Committee as part of the budgetary control process.

4. Accounting and Audit (Internal and External)

4.1 All accounting procedures and financial records of the Council shall be determined by the RFO in accordance with the Accounts and Audit Regulations, appropriate guidance and proper practices.

4.2 The RFO shall complete the annual return (including the Annual Governance Statement and Accounting statements) of the Council, including the council's annual return, as soon as practicable after the end of the financial year and shall submit them and report thereon to the Council within the timescales set by the Accounts and Audit Regulations.

4.3 The RFO shall complete the Accounts of the Council contained in the Annual Return (as supplied by the Auditor appointed from time to time by the Audit Commission) and shall submit the Annual Return for approval and authorisation by the Council within the timescales set by the Accounts and Audit Regulations.

4.4 The Council shall ensure that there is adequate and effective system of internal audit of its accounting records, and its system of internal control in accordance with proper practices. Any officer or member of the Council shall make available such documents and records as appear to the Council to be necessary for the purpose of the audit and shall, as directed by the council, supply the RFO, Internal Auditor or external auditor with such information and explanation as the Council considers necessary for that purpose.

4.5 The Internal Auditor shall be appointed by and shall carry out the work required by the council in accordance with proper practices. The Internal Auditor shall:

- be competent and independent of the financial operations of the Council;
- report to Council in writing, or in person, on a regular basis with a minimum of one annual written report in respect of each financial year;
- demonstrate competence, objectivity and independence, be free from any actual or perceived conflicts of interest, including those arising from family relationships; and
- have no involvement in the financial decision making, management or control of the council.

4.6 Internal or external auditors may not under any circumstances:

- perform any operational duties for the council;
- initiate or approve accounting transactions; or
- direct the activities of any council employee, except to the extent that such employees have been appropriately assigned to assist the internal auditor

4.7 For the avoidance of doubt, in relation to internal audit the terms 'independent' and 'independence' shall have the same meaning as is described in proper practices.

- 4.8 The RFO shall make arrangements for the opportunity for inspection of the accounts, books, and vouchers and for the display or publication of any Notices and statements of account required by Audit Commission Act 1998 and the Accounts and Audit Regulations.
- 4.9 The RFO shall, as soon as practicable, bring to the attention of all councillors any correspondence or report from the Internal or External Auditor, unless the correspondence is of a purely administrative matter.
- 4.10 The Council will review their Internal Auditor every 3 years to ensure that independence and objectivity are maintained.

5. Banking Arrangements and Cheques (Authorisation of payments)

- 5.1 The Council's banking arrangements, including the Bank Mandate, shall be made by the RFO and approved by the Council; banking arrangements may not be delegated to a committee.
- 5.2 A schedule of the payments required, forming part of the Agenda for the meeting, shall be prepared by the RFO and, together with the relevant invoices, be presented to F&GP Committee. If the schedule is in order it shall be authorised by a resolution of the F&GP Committee. Personal payments (including salaries, wages, expenses and any payment made in relation to the termination of a contract of employment) may be summarised to remove public access to any personal information
- 5.3 Cheques drawn on the bank account or purchases made with the Council's debit card in accordance with the schedule referred to in paragraph 5.2 or in accordance with paragraph 6.4, shall be signed by two authorised members of F&GP committee. If a member who is also a bank signatory has declared a disclosable pecuniary interest, or has any other interest, in the matter in respect of which the payment is being made, that councillor shall be required to consider Standing Orders, and thereby determine whether it is appropriate and/or permissible to be a signatory to the transaction in question.
- 5.4 To indicate agreement of the details shown on the cheque or order for payment with the counterfoil and the invoice or similar documentation, the signatories shall each also initial the cheque counterfoil.
- 5.5 The RFO will process payments on a weekly basis so that weekly cheque signing can take place to ensure that suppliers are paid in a timely manner.
- 5.6 'Cheque signatories shall be reviewed at the first meeting of each new financial year by the Council

6. Payment of Accounts

- 6.1 The Council will make safe and efficient arrangements for the making of its payments.

- 6.2 All payments shall be effected by cheque or debit card drawn on the Council's bankers.
- 6.3 All invoices for payment shall be examined, verified and certified by the RFO. The RFO shall satisfy him/herself that the work, goods or services to which the invoice relates shall have been received, carried out, examined and approved.
- 6.4 The RFO shall examine invoices in relation to arithmetic accuracy and shall analyse them to the appropriate expenditure heading. The RFO shall take all steps to settle all invoices submitted, and which are in order, for approval at the next available F&GP committee Meeting.
- 6.5 If a payment is necessary and the due date for payment is before the next scheduled Meeting of the F&GP Committee, where the RFO certifies that there is no dispute or other reason to delay payment, the RFO may (notwithstanding para 6.3) take all steps necessary to settle such invoices provided that a list of such payments shall be submitted to the next appropriate meeting of F&GP Committee
- 6.6 The RFO may provide petty cash to officers for the purpose of defraying operational and other expenses (where it is not possible or appropriate to be invoiced). Vouchers for payments made shall be forwarded to the RFO with a claim for reimbursement.
- The RFO shall maintain as petty cash float of £150 for the purpose of defraying operational and other expenses. Vouchers for payments made from petty cash shall be kept to substantiate the payment.
 - Income received must not be paid into the petty cash float but must be separately banked, as provided elsewhere in these regulations.
 - Payments to maintain the petty cash float shall be shown separately on the schedule of payments presented to F&GP Committee under 5.2 above.
- 6.7 If thought appropriate by the F&GP Committee, payment for utility supplies (energy, telephone and water) may be made by variable Direct Debit provided that the instructions are signed by two members and any payments are reported to council as made. The approval of the use of a variable Direct Debit shall be renewed by resolution of the F&GP Committee at least every two years.
- 6.8 The approval of the use of a Debit Card shall be reviewed by the F&GP Committee when setting the budget

7. Payment of Salaries

- 7.1 As an employer, the council shall make arrangements to meet fully the statutory requirements placed on all employers by PAYE (Pay as You Earn) and National Insurance legislation. The payment of all salaries shall be made in accordance with payroll records and the rules of PAYE and National Insurance currently operating, and salaries shall be as agreed by the Council's Personnel Committee.

- 7.2 Payment of salaries and payment of deductions from salary such as may be required to be made for tax, national insurance and pension contributions, or similar statutory or discretionary deductions, must be made in accordance with the payroll records and on the appropriate dates stipulated in employment contracts, provided that each payment is reported to and ratified by the next available the F&GP Committee, as set out in these regulations above.
- 7.3 No changes shall be made to an employee's pay, emoluments, or terms and conditions of employment without the prior consent of the Personnel Committee.
- 7.4 Each and every payment to employees of net salary and to the appropriate creditor of the statutory and discretionary deductions shall be recorded in a separate confidential record. This confidential record is not open to inspection or review (under the Freedom of Information Act 2000 or otherwise) other than:
- a) By any councillor who can demonstrate a need to know;
 - b) By the internal auditor;
 - c) By the external auditor; or
 - d) By any person authorised under the Audit Commission Act 1998, or any superseding legislation
- 7.5 The total of such payments in each calendar month shall be reported with all other payments as made as may be required under these Financial Regulations, to ensure that only payments due for the period have been paid.
- 7.6 Any termination payments shall be supported by a clear business case and reported to the council. Termination payments shall only be authorised by council.

8. Loans and Investments

- 8.1 All borrowings shall be effected in the name of the council, after obtaining any necessary borrowing approval. Any application for borrowing approval shall be approved by Council as to terms and purpose. The application for borrowing approval, and subsequent arrangements for the loan shall only be approved by full council.
- 8.2 All loans and investments shall be negotiated in the name of the Council and shall be for a set period in accordance with Council policy.
- 8.3 The council shall consider the need for an Investment Policy which, if drawn up, shall be in accordance with relevant regulations, proper practices and guidance. Any Policy shall be reviewed at least annually.
- 8.4 All investments of money under the control of the Council shall be in the name of the Council.
- 8.5 All borrowings shall be effected in the name of the Council, after obtaining any necessary borrowing approval. Any application for borrowing approval shall be

approved by Council as to terms and purpose. The terms and conditions of borrowings shall be reviewed at least annually.

- 8.6 All investment certificates and other documents relating thereto shall be retained in the custody of the RFO.

9. Income

- 9.1 The collection of all sums due to the Council shall be the responsibility of and under the supervision of the RFO.
- 9.2 Particulars of all charges to be made for work done, services rendered or goods supplied shall be agreed annually by the Council, notified to the RFO and the RFO shall be responsible for the collection of all accounts due to the Council.
- 9.3 The Council will review all fees and charges annually as part of the budget setting process following a report of the RFO.
- 9.4 Any sums found to be irrecoverable and any bad debts shall be reported to the council and shall be written off in the year
- 9.5 All sums received on behalf of the council shall be banked intact as directed by the RFO. In all cases, all receipts shall be deposited with the council's bankers with such frequency as the RFO considers necessary
- 9.6 The origin of each receipt shall be entered on the paying-in slip.
- 9.7 Personal cheques shall not be cashed out of money held on behalf of the Council.
- 9.6 The RFO or other officer delegated by the Council shall promptly complete any Value Added Tax (VAT) Return that is required. Any repayment claim due in accordance with VAT Act 1994 section 33 shall be made at least annually coinciding with the financial year end.
- 9.7 Where any significant sums of cash are regularly received by the Council, the RFO shall take such steps as are agreed by the Council to ensure that more than one person is present when the cash is counted in the first instance, that there is a reconciliation to some form of control such as ticket issues, and that appropriate care is taken in the security and safety of individuals banking such cash.

10. Orders for Work, Goods and Services

- 10.1 An official order or letter shall be issued for all work, goods and services unless a formal contract is to be prepared or an official order would be inappropriate. Copies of orders shall be retained.
- 10.2 All members and Officers are responsible for obtaining value for money at all times and shall ensure as far as reasonable and practicable that the best

available terms are obtained in respect of each transaction, usually by obtaining three or more quotations or estimates from appropriate suppliers, subject to any de minimis provisions in Regulation 11.1 below.

- 10.3 A member may not issue an official order or make any contract on behalf of the council
- 10.4 The RFO shall verify the lawful nature of any proposed purchase before the issue of any order, and in the case of new or infrequent purchases or payments, the RFO shall ensure that the statutory authority shall be reported to the meeting at which the order is approved so that the minutes can record the power being used.
- 10.5 Preference is to be given to local contractors or suppliers within the Seaton parish boundary where possible and where good value for money can be demonstrated.
- 10.6 Pro forma invoices will only be paid in exceptional circumstances and only where there is a clear audit trail to accompany the pro forma invoice.

11. Contracts

- 11.1 Procedures as to contracts are laid down as follows:
 - (a) Every contract shall comply with these financial regulations, and no exceptions shall be made otherwise than in an emergency (as in 3.4) provided that this regulation need not apply to contracts which relate to items (i) to (vi) below:
 - i. for the supply of gas, electricity, water, sewerage and telephone services;
 - ii. for specialist services such as are provided by solicitors, accountants, surveyors and planning consultants;
 - iii. for work to be executed or goods or materials to be supplied which consist of repairs to or parts for existing machinery or equipment or plant;
 - iv. for work to be executed or goods or materials to be supplied which constitute an extension of an existing contract by the council;
 - v. for additional work of the external auditor up to an estimated value of £500 (in excess of this sum the Clerk shall act after consultation with the Chairman and Vice Chairman of council); and
 - vi. for good and materials proposed to be purchased which are proprietary articles and/or are only sold at a fixed price
 - (b) Where it is intended to enter into a contract exceeding £25,000 in value for the supply of goods or materials or for the execution of works or specialist services the Council must comply with the Public Contract Regulations 2015 ("The Regulations") and will procure on the basis of a formal tender
 - (d) The full requirements of The Regulations, as applicable, shall be followed in respect of the tendering and award of a public supply contract, public service contract or public works contract which exceeds thresholds in The Regulations set by Public Contracts Directive 2014/24/EU (which may change from time to time).

- (e) Such invitation to tender shall state the general nature of the intended contract and the Clerk shall obtain the necessary technical assistance to prepare a specification in appropriate cases. The invitation shall in addition state that tenders must be addressed to the Clerk in the ordinary course of post. Each tendering firm shall be supplied with a specifically marked envelope in which the tender is to be sealed and remain sealed until the prescribed date for opening tenders for that contract.
- (f) All sealed tenders shall be opened at the same time on the prescribed date by the Clerk in the presence of members of the appropriate committee.
- (f) If less than three tenders are received for contracts above £25,000 or if all the tenders are identical the Council or appropriate committee may make such arrangements as it thinks fit for procuring the goods or materials or executing the works.
- (g) Any invitation to tender issued under this regulation shall be subject to Standing Order X and shall refer to the terms of the Bribery Act 2010.
- (h) When it is to enter into a contract less than £25,000 in value for the supply of goods or materials or for the execution of works or specialist services other than such goods, materials, works or specialist services as are excepted as set out in paragraph (a) the Clerk shall obtain 3 quotations (priced descriptions of the proposed supply); where the value is below £2,500 and above £100 the Clerk shall strive to obtain 3 estimates. Otherwise, Regulation 10.2 above shall apply.
- (i) The Council shall not be obliged to accept the lowest tender, quote or estimate
- (j) Should it occur that the council, or duly delegated committee, does not accept any tender, quote or estimate, the work is not allocated and the council requires further pricing, providing that the specification does not change, no person shall be permitted to submit a later tender, estimate or quote who was present when the original decision making process was being undertaken.
- (k) The European Union Procurement Directive shall apply and the terms of the Public Contracts Regulations 2015 and the Utilities Contracts Regulations 2006 including thresholds shall be followed.

12. Payments Under Contracts for Building or Other Construction Works

- 12.1 Payments on account of the contract sum shall be made within the time specified in the contract by the RFO upon authorised certificates of the architect or other consultants engaged to supervise the contract (subject to any percentage withholding as may be agreed in the particular contract).
- 12.2 Where contracts provide for payment by instalments the RFO shall maintain a record of all such payments. In any case where it is estimated that the total cost

of work carried out under a contract, excluding agreed variations, will exceed the contract sum of 5% or more a report shall be submitted to the council.

- 12.3 Any variation to a contract or addition to or omission from a contract must be approved by the Council or appropriate committee and Clerk to the Contractor in writing, the Council being informed where the final cost is likely to exceed the financial provision.

13. Stores and Equipment

- 13.1 The RFO shall be responsible for periodic checks of stocks & stores at least annually.

14. Assets, Properties and Estates

- 14.1 The Clerk shall make appropriate arrangements for the custody of all title deeds and Land Registry Certificates of properties owned by the Council. The RFO shall ensure a record is maintained of all properties owned by the Council, recording the location, extent, plan, reference, purchase details, nature of the interest, tenancies granted, rents payable and purpose for which held in accordance with Accounts and Audit Regulations.
- 14.2 No tangible moveable property shall be purchased or otherwise acquired, sold, leased or otherwise disposed of without the authority of the Council, together with any other consents required by law, save where the estimated value of any one item of tangible movable property does not exceed £200.
- 14.3 No real property (interests in land) shall be sold, leased or otherwise disposed of without the authority of the council, together with any other consents required by law. In each case a report in writing shall be provided to council in respect of valuation and surveyed condition of the property (including matters such as planning permissions and covenants) together with a proper business case (including an adequate level of consultation with the electorate).
- 14.4 No real property (interests in land) shall be purchased or acquired without the authority of the full council. In each case a report in writing shall be provided to council in respect of valuation and surveyed condition of the property (including matters such as planning permissions and covenants) together with a proper business case (including an adequate level of consultation with the electorate).
- 14.5 Subject only to the limit set in Regulation 14.2 above, no tangible moveable property shall be purchased or acquired without the authority of full council. In each case a report in writing shall be provided to council with a full business case
- 14.6 The RFO shall ensure that an appropriate and accurate Register of Assets and Investments is kept up to date. The continued existence of tangible assets shown in the Register shall be verified at least annually, possibly in conjunction with a health and safety inspection of assets.

15. Insurance

- 15.1 Following the annual risk assessment (per Financial Regulation 17), the RFO shall effect all insurances and negotiate all claims on the Council's insurers.
- 15.2 The RFO shall keep a record of all insurances including new risks effected by the Council and the property and risks covered thereby and annually review it.
- 15.3 The RFO shall be notified of any loss liability or damage or of any event likely to lead to a claim, and shall report these to Council at the next available meeting.
- 15.4 All appropriate members and employees of the Council shall be included in a suitable fidelity guarantee insurance which shall cover the maximum risk exposure as determined annually by the Council, or duly delegated committee.

16. Charities

- 16.1 Where the Council is sole trustee of a Charitable body the RFO shall ensure that separate accounts are kept of the funds held on charitable trusts and separate financial reports made in such form as shall be appropriate, in accordance with Charity Law and legislation, or as determined by the Charity Commission. The RFO shall arrange for any Audit or Independent Examination as may be required by Charity Law or any Governing Document.

17. Risk Management

- 17.1 The council is responsible for putting in place arrangements for the management of risk. The RFO shall prepare, for approval by the council, risk management policy statements in respect of all activities of the council. Risk policy statements and consequential risk management arrangements shall be reviewed by the council at least annually.
- 17.2 When considering any new activity, the Clerk shall prepare a draft risk assessment including risk management proposals for consideration and adoption by the council.

18. Suspension and Revision of Financial Regulations

- 18.1 It shall be the duty of the Council to review the Financial Regulations of the Council from time to time. The Clerk shall make arrangements to monitor changes in legislation or proper practices and shall advise the council of any requirement for a consequential amendment to these financial regulations.

19. Finance System

- 19.1 Regular back up copies of the records on any computer shall be made and shall be stored securely away from the computer in question, and preferably off site
- 19.2 The Council shall ensure that anti-virus, anti-spyware and firewall, software

with automatic updates, together with a high level of security, is used.