**Purpose**

The purpose of this policy is to set out how our school will manage electronic funds in accordance with applicable Department of Education and Training policy and law.

**scope**

This policy applies to:

* all staff/responsible persons involved in management of funds transacted electronically
* all transactions carried out by Toolamba Primary School via the methods set out in this policy

**Policy**

Toolamba Primary School has developed this policy consistently with the [Schools Electronic Funds Management Guidelines](http://www.education.vic.gov.au/Documents/school/principals/finance/Fin%20Schools%20Electronic%20Funds%20Management%20Guidelines%20V1_2.pdf) and [Section 4 Internal Controls](https://www2.education.vic.gov.au/pal/internal-controls-finance-manual-section-4/policy) of the Finance Manual for Victorian Government schools.

**Implementation**

* Toolamba Primary School Council requires that all actions related to internet banking are consistent with The Department’s [Schools Electronic Funds Management Guidelines](http://www.education.vic.gov.au/Documents/school/principals/finance/Fin%20Schools%20Electronic%20Funds%20Management%20Guidelines%20V1_2.pdf).
* Toolamba Primary School Council approves the use of CBA Commbiz as the approved software for all internet banking activities as individual authority and security tokens are required.
* All payments through internet banking software must be consistent with Department requirements and must be authorised by the Principal and one other member of School Council nominated by the School Council.
* Toolamba Primary School Council will determine how refunds will be processed and any refunds processed through the EFTPOS terminal will be recorded in a refund register.
* Toolamba Primary School will undertake maintenance and upgrading of hardware and software as required.
* Toolamba Primary School will ensure proper retention/disposal of all transaction records relating to accounts such as purchase orders, tax invoices/statements, vouchers, payroll listings and relevant CASES21 reports.

**EFTPOS**

* The Principal of Toolamba Primary School, will ensure all staff operating the merchant facility are aware of security requirements.
* School Council minutes must record which staff are authorised to process transactions. Principal and Business Manager are the only to authorised to operate the EFTPOS
* No “Cash Out” will be permitted on any school EFTPOS facility.
* Copies of EFTPOS receipts, void transactions, refunds and reconciliations will be kept with Financial Records of the school
* Offline transactions will be completed using a MOTO Transaction form which records cardholder name, date of transaction, amount, and card details and purpose of the transaction.
* Toolamba Primary school will EFTPOS transactions via telephone or post.
* Maximum refund limit is set at $500
* All EFTPOS transactions will be reconciled with Cases 21 Finance.
* Transactions will only be accepted that match school invoice payments eg family charges, sundry debtors, trading operations payments etc.

**Direct Debit**

* All direct debit agreements must be approved and signed by School Council prior to implementation.
* The School Council requires all suppliers to provide tax invoices/statements to the school prior to direct debiting any funds from the school’s account
* A direct debit facility allows an external source [e.g. VicSuper, ATO, Westpac Purchasing Card, Annual Insurance premiums, newsletter subscription or monthly lease payments suppliers relevant to them] to a pre-arranged amount of funds from the school’s official account on a pre-arranged date. Any such payments will be authorised as appropriate and required.
* Toolamba Primary School will ensure adequate funds are available in the Official Account for the “sweep” of funds to the supplier.

**Direct Deposit**

* Toolamba Primary School utilises a “two user authorisation of payments” banking package, as it contains a greater degree of security and access controls.
* Creditor details will be kept up to date and the treatment of GST for creditors will be monitored.
* Payment transactions will be uploaded as a batch through the CASES21 system.
* All payments made through the internet banking system must be authorised by two authorised officers. Authorised users are: Heather Kennedy (Principal), Filippa Kimmorley (teacher) and Craig Thompson (teacher).
* The various internal controls that need to be considered include:
	+ the identification of staff with administrative responsibilities NOTE: The school business manager cannot be nominated as an authoriser even if he or she is a member of the school council. Business Manager uploads the payment batch for authorisation.
	+ the identification of staff with authorisation/signatory responsibilities (the Principal and other designated officer). NOTE: A single authoriser of payments via internet banking software is a clear breach of the regulations governing the payment of accounts by schools.
	+ the Business Manager must not have banking authorisation/signatory responsibilities other than for the transferring of funds between school bank accounts
	+ the allocation and security of personal identification number (PIN) information or software authorisation tokens
	+ the setting up of payee details in CASES21
	+ the authorisation of transfer of funds from the official account to payee accounts
	+ alternative procedures for processing, using the direct deposit facility, for periods of Business Manager’s and Principal leave of absence.
	+ Proper retention of all transactions relating to accounts such as purchase orders, tax invoices/statements, vouchers, payroll listings, signed or initialled screen prints and payee details, relevant CASES21 reports etc, including principal signed and dated internet transaction receipts attached to authorised payment vouchers.
	+ the retention of printed payment receipts that display all details of a payment so as to confirm payment details.

**BPay**

Toolamba Primary School Council will approve in writing the School Council’s decision for the utilisation of BPAY.

Payments made by BPay are subject to the same requirements as for all transactions relating to accounts such as:

* purchase orders
* tax invoices/statements
* payment vouchers
* signed screen prints and payee details
* relevant CASES21 reports etc.

This includes a requirement for the Principal to sign and date BPay transaction receipts attached to authorised payment vouchers.

**COMMUNICATION**

This policy will be communicated to our staff in the following ways:

* Included in staff induction processes for all staff who are involved in funds management
* Included in staff handbook/manual for relevant staff

**Further Information and Resources**

* Finance Manual for Victorian Government Schools
	+ [Section 3 Risk Management](https://www2.education.vic.gov.au/pal/risk-management-finance-manual-section-3/policy)
	+ [Section 4 Internal Controls](https://www2.education.vic.gov.au/pal/internal-controls-finance-manual-section-4/policy)
	+ [Section 10 Receivables Management and Cash Handling](https://www2.education.vic.gov.au/pal/receivables-management-and-cash-handling-finance-manual-section-10/policy)

Available from: [Finance Manual — Financial Management for Schools](https://www2.education.vic.gov.au/pal/finance-manual/policy)

* [Schools Electronic Funds Management Guidelines](http://www.education.vic.gov.au/Documents/school/principals/finance/Fin%20Schools%20Electronic%20Funds%20Management%20Guidelines%20V1_2.pdf)
* CASES21 Finance Business Process Guide
	+ [Section 1: Families](https://edugate.eduweb.vic.gov.au/edulibrary/Schools/Forms/AllItems.aspx?RootFolder=%2fedulibrary%2fSchools%2fCASES21%2fCASES21%20Finance%2fFinance%20Business%20Process%20Guide&FolderCTID=&View=%7b393E28AF%2d9188%2d49EC%2d9B2F%2d5B1CA6BF217D%7d)
* [Internal Controls for Victorian Government Schools](http://www.education.vic.gov.au/Documents/school/principals/finance/Fin%20Internal%20Control%20document%20v3.2.pdf)
* [ICT Security Policy](https://edugate.eduweb.vic.gov.au/Services/IT/ITPolicies/Pages/Responsibilities.aspx)
* [Public Records Office Victoria](https://www.prov.vic.gov.au/)
* [Records Management — School Records](https://www2.education.vic.gov.au/pal/records-management/policy)

**POLICY REVIEW AND APPROVAL**

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| --- | --- |
| Policy last reviewed  | 21st February, 2022 |
| Approved by  | School Council  |
| Next scheduled review date  | 2023 |