Financial Regulations

Part of Riverside

Registered Scottish Charity No: SC042551

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1. Introduction

Riverside Scotland operates within The Riverside Group Limited (TRGL) and is committed to the highest standards of financial governance, accountability, and internal control. These Financial Regulations set out the principles, responsibilities, and control framework governing all financial activities undertaken by, or on behalf of, Riverside Scotland.

Riverside Scotland must conduct its affairs in a prudent manner, safeguarding all assets, ensuring financial sustainability, and complying with relevant Scottish legislative, regulatory, and accounting requirements, including:

- The Housing (Scotland) Act 2014
- Scottish Housing Regulator (SHR) Regulatory Standards on financial health, governance, and sustainability
- Registered Social Landlords' Accounting Requirements (Scotland)

As part of TRGL, Riverside Scotland aligns to Group-level policy standards included in the ***Finance Policy*** which sets out the Group's **risk management approach**, **internal controls assurance framework**, and **financial governance expectations.** The ***Finance Policy*** also outlines the fundamental principles TRGL Finance functions operate under within the policy and includes details of the Financial Directives which shape the framework for each team engaged in financial decision making or financial activities including those undertaken by TRGL Group Finance, on behalf of Riverside Scotland.

Riverside Scotland's financial management framework therefore combines:

- Scotland-specific financial regulatory requirements and statutory duties.
- Riverside Group-wide financial governance, control environment and risk methodology for all financial decision-making, risk assessments or activities with financial implications undertaken on behalf of Riverside Scotland.
- Local operational responsibilities of the Riverside Scotland Board and SMT.

The Riverside Scotland Board is responsible for ensuring Riverside Scotland's financial and legal responsibilities are met and that it operates as economically and efficiently as possible within its overall objectives.

Although the Riverside Scotland Board is ultimately responsible for the regulation and control of Riverside Scotland's finances, this is largely exercised through the Riverside Scotland Senior Officers or TRGL Finance Functions as detailed in this document. Overall responsibility for the day-to-day financial management of Riverside Scotland lies with the Managing Director, with responsibility delegated to Senior Officers where appropriate and supported by TRGL appointed Finance Business Partner (FBP).

All employees and members of Riverside Scotland are required to adhere to the Regulations and to comply with all statutory obligations arising from them. The Managing Director must be

informed in all cases of non-compliance. Breaches may be investigated under the internal disciplinary procedures.

2. Finance Fundamentals and Enablers

The Finance Regulations are based on **four core Finance Fundamentals** and **two Finance Enablers**, consistent with the Group Finance Policy and tailored to Scotland's regulatory environment.

2.1 Finance Fundamental 1 – Compliance

- Group Finance will, on behalf of Riverside Scotland, comply with all statutory, regulatory and tax obligations and will not undertake ultra vires transactions.
- Group Finance, on behalf of Riverside Scotland, maintain statutory accounting records in accordance with recognised accounting standards, and archive and retain financial information in accordance with legal and regulatory requirements.
- The Group Treasury function will manage loan funding and relationships with lenders on behalf of Riverside Scotland. Riverside Scotland will comply with all requirements imposed by specific loan agreements and treasury instruments.
- Group Finance will provide access to all information and papers supporting the activities of the finance function to its auditors and those charged with regulatory reviews.
- Group Finance will adopt appropriate underpinning processes and procedures to fulfil requirements obligations.

2.2 Finance Fundamental 2 – Liquidity

- All monies held by Riverside Scotland are under the control of the Managing Director.
- The Group Treasury function will ensure Riverside Scotland has adequate liquidity, cash resources and borrowing arrangements to always enable it to have a level of funds available to it which are necessary for the achievement of its business objectives, to invest in homes and services, and to respond to economic and sector challenges.
- Cashflow projections will be prepared regularly and reviewed in line with Group Treasury Policy requirements.
- Riverside Scotland will ensure liabilities are met when due and unexpected expenditure can be supported.

2.3 Finance Fundamental 3 – Safe Assets

- Riverside Scotland will direct its affairs in a prudent manner.
- Riverside Scotland will maintain a robust framework of internal financial controls supported by Group Finance's operational risk register and control assurance model.
- Group Finance will maintain a Finance Manual setting out how controls and processes are operated.
- Group Finance will support Riverside Scotland to assess the risks and financial viability of all major investment opportunities through rigorous appraisal, affordability testing,

stress testing, and covenant analysis.

- Riverside Scotland will maintain an effective internal audit function which will be provided by TRGL Corporate Audit.
- Riverside will maintain robust arrangements to prevent, detect, and investigate fraud.
- Riverside Scotland will maintain whistleblowing arrangements for employees to raise legitimate concerns.
- TRGL will ensure that adequate insurances are in place on behalf of the Riverside Scotland.
- Riverside Scotland will preserve the capital value of its resources and minimise the risks associated with Treasury Management using only those instruments, methods and techniques approved in the Treasury Strategy and permitted by the rules.

2.4 Finance Fundamental 4 – Business Insight

- Group Finance will prepare an annual budget and 30-year business plan for Riverside Scotland Board approval. The plan will be prepared in line with TRGL timetable and will require subsequent approval by TRGL Board.
- Business planning will incorporate risk identification, scenario planning and stress-testing in line with the Group Finance Policy.
- Financial and treasury performance reporting will be provided by Group Finance to Riverside Scotland Senior Officers and to the Riverside Scotland Board.
- Riverside Scotland Board members will receive training on relevant financial matters.

2.5 Finance Enabler 1 – People

- All employees will manage finances with the highest standards of integrity and fairness, avoiding activities that compromise reputation or customer trust.
- All employees with authority to commit Riverside Scotland's resources or who have responsibility for financial and treasury processes must have appropriate skills, qualifications, and training. This will be achieved through suitable recruitment, training, development, and appraisal.
- Access to systems, data and information will be role based and all employees are expected to act honestly and with integrity and to safeguard resources for which they are responsible.
- Responsibilities must be clearly defined and understood across all teams.

2.6 Finance Enabler 2 – Technology

- Riverside Scotland will use Group finance systems and be consistent TRGL processes unless there are clear business reasons for Scotland specific exceptions.
- TRGL will maintain and enhance systems to ensure they remain efficient, secure, robust and fit-for-purpose.
- TRGL will ensure finance system controls are put in place to protect accounting records, intellectual property, information, and files from unauthorised access, tampering, loss, or damage.

- Finance systems will be reviewed on an ongoing basis and enhanced as required to maintain business objectives.

3. Financial Directives (FD1–FD16)

The Financial Directives describe the high-level processes, controls and accountabilities underpinning all financial activities.

3.1 FD1: Planning

Aligning to the ***Finance Policy*** planning and risk methodology, a prudent approach will be taken in financial planning and risk, ensuring borrowing, investment, and development decisions are affordable, stress-tested, and consistent with the risk appetite.

- Each year, Group Finance (Financial Planning and FBP) will produce a thirty-year business plan and a detailed annual budget. These will consist of a statement of comprehensive income, a statement of financial position and a statement of cash flows together with narrative and key performance indicators.
- Appropriate, robust, and prudent business plans will be prepared including assumptions approved by the Group Finance Committee and Riverside Scotland Board
- The planning process usually takes place between September and March of each financial year and the timetable must be strictly adhered to.
- Group Finance (Financial Planning and FBP) will ensure effective systems are in place to monitor and accurately report delivery of the business plan to Riverside Scotland SMT and Board.
- Group Finance (Financial Planning and FBP) must ensure that the financial and other implications of risks to the delivery of plans are fully considered, that robust stress testing is carried out against identified risks and combinations of risks across a range of scenarios, and that appropriate mitigation strategies are developed as a result.
- Any circumstances that come to light which significantly impact previously agreed business plans must be reported immediately to the Managing Director and to the Riverside Scotland Board.

3.2 FD2: Accounting Policies

- In addition to TRGL approval requirements, Accounting Policies are approved by Riverside Scotland Board. The main accounting policies can be found in the latest Financial Statements, although these are not exhaustive.
- Any proposed accounting treatment not specified in accounting policies should be discussed with the Managing Director.

3.3 FD3: Financial Accounting

- Group Finance (Financial Accounting) will, on behalf of Riverside Scotland maintain accounting records sufficient at all times to:
    - Identify assets and liabilities and hold on a register.
    - Ensure debts are paid when due.
    - Recognise and collect all income that is due.
    - Provide regular reports on the financial position to senior managers, the Riverside Scotland Board and Statutory or Regulatory bodies.
- These allow for the preparation, at any time, of financial statements, which give a true and fair view of both the results for the period prescribed and the net assets.
- The financial statements must be prepared in compliance with all the relevant statutory and regulatory requirements, filed accurately and timely, and in accordance with the approved accounting policies. These include:
    - UK Generally Accepted Accounting Practice, including FRS102.
    - Co-operative and Community Benefit Societies Act 2014
    - Housing (Scotland) Act 2014
    - Registered Social Landlords Determination of Accounting Requirements 2019
- Riverside Scotland will respond to the information requirements of the regulator and ensure that all deadlines are met.
- Group Finance will, on behalf of Riverside Scotland archive and retain financial information in accordance with legal and regulatory requirements.
- Approval of the annual financial statements by Board follows a recommendation by the Audit & Risk Committee.

3.4 FD4: Management Accounting

- The Group Finance FBP ensure robust and prudent budgets and forecasts which are based on appropriate and reasonable assumptions.
- The Group Finance FBP will ensure effective systems are in place to monitor and accurately report delivery of the Budget and Forecasts. The FBP will produce a detailed monthly performance report. This will consist of a statement of comprehensive income, a statement of financial position, capital expenditure, covenant compliance report, key performance indicators and explanation of variances and corrective actions.
- All management accounts will comply with accounting policies.
- The Group Finance FBP will monitor and report on financial performance through business reviews with Riverside Scotland SMT and Riveside Scotland Board, against the approved business deliverables within the Business Plan including key performance indicators, explanation of variances, corrective actions and identified financial risks and opportunities.
- The Group Finance FBP will provide detailed and insightful financial data and analysis to support strategic decision making.
- The Group Finance FBP will identify the impact of significant business decisions by Riverside Scotland SMT and Board on risk and financial viability (including continued covenant compliance) ensuring financial scrutiny and sign off business development opportunities for example, moving into a new business stream or taking on new sources of funding.

3.5 FD5: Responsibility Through Delegation

- Riverside Scotland will maintain a Scheme of Delegation which will set out roles and responsibilities as well as agreed authorisation levels.
- In all cases, delegated authority levels are subject to the necessary budget approval.
- Authority to approve or make payments should not be granted to temporary members of staff without close supervision.

3.6 FD6: Salaries, Wages and Pensions

- The payroll function is wholly provided by Group Central Services.
- No permanent staff appointments shall be made at Executive Team level or above without the prior approval of the Board.
- Any permanent amendments made to the staff structure below Executive Team level will be reported to Board.
- Delegated authority sets out financial authority levels for employees who can authorise salary payments.
- Group Finance (Treasury Pensions) will comply with all legal and regulatory requirement ensuring pension schemes are fit for purpose.

3.7 FD7: Payments for Goods and Services

- Delegated authority (see Appendix 1 Schedule of Delegated Authority) sets out financial authority levels for Riverside Scotland employees who can commit to expenditure and authorise payments.
- The Group Procurement Policy sets out how value for money will be achieved and how goods and services will be procured both to secure best value and so that the procurement process is fair and transparent, ensuring that any arrangements entered do not inappropriately advance the interests of third parties.
- The Group Procurement Policy also sets out the necessary checks which must take place before supplier accounts are set up within the finance system and amendments to supplier accounts are verified against relevant and accurate information.
- Procurement will ensure payment of external suppliers in accordance with binding procurement contracts.
- Group Accounts Payable effective systems are in place to supports the segregation of duty for the requisitioner, budget holder and approver.
- Group Accounts Payable will ensure that all payments for goods and services are properly authorised in line with the Scheme of Delegated Authority.
- Group Accounts Payable will ensure amendments to supplier accounts within the finance system will be subject to rigorous checks and controls to prevent fraud.

3.8 FD8: Income

- Group Finance (Customer Payments) will ensure that suitable controls are in place for the proper and timely recording and accounting of all income receivable to its collection and banking to ensure all income receipts are applied to customer accounts in the housing management system to maintain customer rent balances.
- Group Finance will ensure effective systems are in place to support the segregation of duty ensuring that staff with access to amend the housing management system do not have access to amend accounting records (and vice versa).
- Wherever practicable, cash handling must be minimised. Cash payments should only be taken in exceptional circumstances e.g. prior to court action.
- Current tenant debt will only be written off where there are legislative reasons for doing so e.g. sequestration, protection via trust deed.
- Effective systems are in place to ensure that debt is written off only once all avenues for recovery have been exhausted and write offs are properly authorised in line with the Scheme of Delegated Authority.
- Effective systems are in place to ensure robust and prudent provisions for doubtful debt which are based on appropriate and reasonable assumptions.
- The central Former Tenant Arrears team will manage all former tenant debts on behalf of the Association.
- Former tenant debt will be written off after one year. During the year, a range of tracing techniques for all debt which are economic to recover will be utilised. Formers debts older than one year will be chased where there is a reasonable belief that the debt is collectable.
- All debts written off will be reported to Riverside Scotland Board on an annual basis.

3.9 FD9: Banking Arrangements

- For day-to-day banking purposes, the Association will use bankers appointed by Group.
- It may be necessary to open an account where the banker has not been appointed by Group. Where this is the case, officers will work with Treasury colleagues in Group.
- Approval from both the Riverside Scotland Board and TRGL Board is required prior to the opening of any such bank account.
- Day to day control of the banking arrangements will rest with the Managing Director.
- No payment is to be made from any bank account unless in accordance with the system of delegated authority.
- The central Treasury function will ensure effective management of cash and loan resources on behalf of the Riverside Scotland

3.10 FD10: Insurance

- Riverside Scotland will be included within the Group insurance policies.
- The Group Corporate Services Director, overseen by TRGL Board, is responsible for the appointment of insurers.
- The Group Corporate Services Director will take appropriate advice to ensure that appropriate cover is secured.

3.11 FD11: Assets

- All assets must be acquired in accordance with the procurement policy, the development scheme appraisal procedure, and the system of delegated authority. This is subject to budgetary provision.
- An appropriate register of all properties owned by Riverside Scotland will be kept by Group Central Services recording relevant property details.
- Group Finance will maintain a register of other capital items such as office property, computer equipment etc. on behalf of the Riverside Scotland.
- Assets capitalised in the Statement of Financial Position are to be depreciated in line with policy. Social housing and other grant will be amortised in line with policy. An annual impairment review will be carried out.
- All disposal of assets must be the best sale value, in accordance with delegated authority and the asset management strategy.
- The rechargeable repairs policy sets out the arrangements to minimise the cost of damage to properties by tenants.
- Treasury Property will ensure that all housing assets are protected, ensure efficient use of property assets to act as security for existing and future funding ensuring that new schemes achieve desired security values, existing property assets are chargeable and can achieve maximum borrowing value, all funding is secured in line with liquidity and cashflow requirements, and all property related covenants are achieved.

3.12 FD12: Treasury

The Treasury function will be managed on behalf of Riverside Scotland by the Group Treasury function. The Treasury function will ensure:

- there is access to sufficient liquidity at all times,
- effective management of cash and loan resources to meet all payment obligations as they fall due.
- comply with funders' covenants.
- financial and other implications of risks to the delivery of the business plan are considered including sufficient cash planning to aid investment decisions.
- minimise the risks associated with treasury management using only those instruments, methods and procedures approved in the Group Treasury Policy.

3.13 FD13: Tax

Tax matters are managed in accordance with the Tax Statement of Principles and in accordance with the Group Tax strategy and Tax Policy which includes:

- Ensuring correct tax treatment is applied to all transactions.
- Complying with all statutory requirements and filing accurate and timely returns to HMRC for VAT, CIS, and Corporation Tax.
- Complying with tax obligations and not undertaking ultra vires transactions.

3.14 FD14: Audit

Internal Audit

- The Group Corporate Audit function will provide independent, objective assurance on the system of internal controls. This will help bring a systematic, disciplined approach to evaluate the effectiveness of risk management, control, and governance.
- An annual risk-based audit strategy will be approved by the Audit & Risk Committee.
- Issues raised as a result of an audit will be reported to management. Regular follow up will take place until agreed management actions are completed. The main findings are reported to the Audit & Risk Committee.
- Corporate Audit are authorised to have unrestricted access to all functions, records, property, and personnel; have full and free access to the Audit & Risk Committee; and obtain the necessary assistance of staff within the Association where they perform audits, as well as specialised services from within or outside Group.
- Corporate Audit will maintain professional audit staff with sufficient knowledge and skills. Corporate Audit will undertake its work in accordance with appropriate professional standards, such as those laid out by the Institute of Internal Auditors.

External Audit

- The Group Audit Committee will appoint and monitor the performance of the external auditors.

3.15 FD15: Company Secretarial

The Riverside Scotland Board, together with senior management will ensure that the company is operating within its permitted boundaries as laid down in the Rules, or memorandum and articles of association.

3.16 FD16: Anti-Fraud

- The Association is committed to the prevention of fraud.
- The Managing Director is responsible for the establishment and promotion of an anti-fraud culture and is further responsible for the establishment of systems of control that assist in the prevention of fraud. Day to day operation and management of these systems is the responsibility of Managers.
- Managers must make themselves aware of the risks involved in the operations for which they are responsible, ensuring that these are regularly reviewed to satisfy themselves that their systems continue to operate effectively.
- Through the Managing Director, the Director of Governance and Deputy Company Secretary must be informed of all suspected frauds and will be responsible for investigating major frauds.
- Managers are required to report all actual or attempted fraud in the quarterly fraud and loss return submitted to Corporate Audit.
- All employees will act honestly with integrity and safeguard the resources for which they are responsible.

- All employees, particularly those with specifically delegated responsibilities, are responsible for ensuring that the established systems of control are operated in practice. It is the duty of all staff to protect Riverside Scotland's Assets; this includes information and goodwill as well as property.
- Employees will play a key part in the prevention of fraud, especially through reporting of suspected fraud. A whistleblowing procedure is in place in the interests of employee raising legitimate concerns.
- Any report of suspected fraud will be treated seriously and investigated to establish whether there is any substance to their claims. The Fraud Response Plan sets out how any cases of actual or suspected irregularity will be investigated.
- Consideration will also be given to the requirements of the UK's Anti-Money Laundering regime. Whilst as a Housing Association, the Riverside Scotland falls outside the financial services sector regulation and therefore outside the scope of the anti-money laundering regime, all businesses should be aware of the money laundering provisions of the Proceeds of Crime Act.

4. Roles & Responsibilities

4.1 Riverside Scotland Board

- Has ultimate responsibility for financial governance and use of resources.
- Approves business plans, budgets, and Financial Regulations.

4.2 Audit & Risk Committee (Scotland)

- Advises the Board on risk management, internal control, and audit.
- Monitors the performance of the internal and external auditors and the implementation of their recommendations.

4.3 Managing Director

- Responsible for day-to-day financial management.
- Must be informed of all non-compliance.

4.4 Group Finance

- Maintains financial controls, planning processes and compliance with these Regulations.
- Provides treasury management, financial systems, tax, corporate audit, external audit procurement, and technical accounting support.

4.5 Group Audit

- Oversees the process for selecting the external auditors. It makes recommendations on their ongoing re-appointment through the Board to the members/shareholders to consider at the AGM. The Group Audit Committee sets and monitors a policy on the engagement of the external auditors for non-audit assignments.

4.6 Group Audit Committee

- Independent, objective assurance on the systems of internal control is provided by The Riverside Group Corporate Audit. Written reports are presented to the Audit & Risk Committee.

4.7 All Employees

- Must comply with the Regulations, protect assets, and operate internal controls.

5. Equality, Diversity & Inclusion

Riverside Scotland is committed to equality, diversity and inclusion and aligns with the Group EDI Policy. All financial policies undergo Equality Impact Assessment where required.

6. Associated Policies

- Finance Policy
- Treasury Policy

Appendix 1 Schedule of Delegated Authority

NEW Riverside Scotland				PROPOSED		
1. All delegations are subject to implementation of relevant policy and procedures.						
2. The delegation below is the lowest level to which authority is delegated.						
3. Officers can authorise costs only up to the limits stated within the annual budget.						
4. Individuals must not authorise any matter directly relating to themselves or in which they have a conflict of interest.						
5. Where authorisations exceed limits below authorisation will be required by Group Executive Director or Group Chief Executive.						
6. Other than in exceptional circumstances, officers should only authorise transactions within their remit.						
7. All write offs must be approved by the Group Financial accountant						
Post	**Contract Approval**	**Order Approval**	**Invoice Approval**	**Rent Adjustment**	**Write Off (7)**	**Over the Counter Payments**
TRGL Board	> £5m	N/A	N/A	N/A	N/A	N/A
Board	>£200,000	N/A	N/A	N/A	N/A	N/A
Committees	£200,000	N/A	N/A	N/A	N/A	N/A
Managing Director	100,000	100,000	100,000	5,000	5,000	10,000
Head of Assets	25,000	50,000	50,000	1,000	1,000	10,000
Head of Finance & Business Support Service	25,000	50,000	50,000	1,000	1,000	10,000
Head of Housing and Communities	25,000	50,000	50,000	1,000	1,000	10,000
Asset Operations Manager	10,000	10,000	10,000	500	500	2,500
Business Support Manager	10,000	10,000	10,000	500	500	2,500
Housing Manager	10,000	10,000	10,000	500	500	-
Governance & Company Secretarial Assistar	-	5,000	5,000	-	-	-
Affordability Officer	-	2,000	2,000	500	-	-
Asset & Building Safety Officer	-	5,000	5,000	-	-	-
Asset Officer	-	2,000	2,000	-	-	-
Complaints Officer	-	2,000	2,000	-	-	-
Customer & Community Engagement Officer		2,000	2,000	500		-
Housing First Family Officer	-	2,000	2,000	-	-	-
Marketing and Communications Business Pa	-	2,000	2,000	-	-	-
Project & Planning Analyst	-	2,000	2,000	-	-	-
Tenant Partner	-	2,000	2,000	500	-	-
Voids & Letting Assistant	-	2,000	2,000		-	-
Voids & Letting Coordinator	-	2,000	2,000	-	-	-
Business Support Assistant	-	-	-	-	-	-
Estate & Compliance Coordinator	-	-	-	-	-	-
Retirement Living Assistant	-	-	-	-	-	-