



FINANCE POLICY

2021

Rodmarton Primary School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share the same commitment. All staff and volunteers are subject to an enhanced DBS check.

Please refer to the school's Child Protection Policy for more information.

'We have carefully considered and analysed the impact of this policy on equality and the possible implications for pupils with protected characteristics, as part of our commitment to meet the Public Sector Equality Duty requirement to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations.'

Agreed date: February 2021

Next review: Spring Term 2022

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1. OVERVIEW

The Governing Body of Rodmarton Primary School is committed to ensuring that the School meets all of its statutory obligations, complies with the County Council's financial regulations and maintains the Schools Financial Values Statement (SFVS).

The detailed financial responsibilities of the Governing Body, its committees, the Headteacher and other staff are defined in this Finance Policy. This should allow the Governing Body to ensure that adequate systems of financial control are in place, and that it receives the financial information it needs to carry out its role.

2. ROLES & RESPONSIBILITIES

The Full Governing Body (FGB) will:

- have the responsibility, though liaison with the Headteacher and the School Business Manager to ensure the statutory requirements for financial management are met and to ensure compliance with the County Council's financial regulations;
- set spending priorities;
- consider and approve the budget; and
- to act responsibly as defined in the FGB Terms and conditions

The Headteacher will:

- ensure compliance with the County Council's financial regulations;
- ensure that sound systems of internal control are in place;
- be responsible for day-to-day financial management;
- compile draft budgets; and
- supply the Governors with regular budget monitoring information.

The staff will:

- comply with the School's financial regulations; and
- be responsible for any budget delegated to them.

3. BEST VALUE

The Full Governing Body is accountable for the way in which the school's resources are allocated to meet the objectives set out in the school's development plans. Governors need to secure the best possible outcome for pupils, in the most efficient and effective way, at a reasonable cost.

The Governors, Headteacher and staff will apply the principles of best value when making decisions about:

- the allocation of resources to best promote the aims and values of the school.
- the targeting of resources to best improve standards and the quality of provision.
- the use of resources to best support the various educational needs of all pupils.

Governors, Headteacher and staff:

- will not waste time and resources on investigating minor areas with values less than [£500] where few improvements can be achieved.
- will not waste time and resources to make minor savings in costs.
- will not waste time and resources by seeking tenders for minor supplies and services.

The pursuit of minor improvements or savings is not cost effective if the administration involves substantial time or costs. Time wasted on minor improvements or savings can also distract management from more important or valuable areas.

4. EFFECTIVE CONTROLS

The School may periodically be subject to a review by internal audit. Governors will complete the School Financial Value Standard (SFVS) every 12 months. Once agreed by governors the SFVS must be signed by the Chair of Governors and submitted to Gloucestershire County Council. The School will implement a timely action plan to implement any recommendations made by its auditors or to address any actions identified by the SFVS. The Full Governing Body will monitor progress against any such action plans to ensure that there is no evidence to suggest unnecessary delays in its implementation.

5. BUDGETS

5.1 Budget Construction

The Headteacher is responsible for the detailed preparation of the annual budget. In doing this he or she should consult with other members of staff to ascertain detailed requirements.

The Full Governing Body will determine the overall sum within which the budget must be set and the amount of any anticipated balance to be carried forward into the following financial year.

In constructing the budget, The Headteacher must take into account priorities identified in the School Development Plan and incorporate the costs of these in the budget. Priorities identified in the Development Plan should always be costed.

The budget total must not exceed the amount of the LA allocation plus or minus any balance brought forward from the previous year. If it appears that this cannot be achieved The Headteacher and Chairman of Governors must inform the Education Department immediately this becomes apparent.

The Full Governing Body must meet in the Autumn term to consider a broad budget strategy and again in the Spring term to consider and approve the detailed budget. The Full Governing Body must subsequently approve the full budget and minute this approval. The Education Department must be informed in writing of the approved budget in a format determined by the Education Department. This statement must be signed by the Chair of the Governors.

In constructing the detailed budget, factors the Headteacher must take account of include:

- any anticipated changes in pupil numbers
- current and previous year's expenditure levels on individual budget headings
- Development Plan priorities
- staff pay awards and increments
- anticipated price inflation
- changes in the staffing complement
- changes in the supply of services (gas, electricity, water, etc)

5.2 Budgetary control and monitoring

The Headteacher is responsible for regular detailed control of the school budget. To achieve this he or she will receive monthly reports from the school's accounting system. Such reports shall show for each budget heading:

- total budget for year
- total commitment and expenditure to date
- variance

The Headteacher is empowered to take remedial action to address variances by effecting virement¹ between individual budget headings. Individual virements may be authorised as follows:

- up to £3,000 - Headteacher (subsequently reported to the Full Governing Body)
- £3001 and over - Full Governing Body

Virements, once approved, must be promptly recorded in the school's accounting system to keep the approved budget up to date.

¹ **Definition of Virement:** This is where budgets are re-allocated from one cost centre to another
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The Headteacher will present detailed budget monitoring statements to the Full Governing Body on a termly basis. Such statements shall show for each budget heading:

- total budget for year
- total commitment and expenditure to date
- variances

The Headteacher will provide explanations for any significant variances identified. The Full Governing Body should identify any significant budgetary issues and decide any remedial action taken or needed and any policy decisions required.

The Headteacher may assign budgetary control of individual budget headings to other members of staff. Such members of staff must receive monthly budget statements as detailed above. The Headteacher remains ultimately accountable to the Full Governing Body for these budget headings.

Payroll expenditure data notified by Shire Hall (in printout format) must be entered promptly each month by the School Business Manager or Administrator into the school's accounting system.

Other non-pay expenditure notified by Shire Hall must be reconciled promptly on a monthly basis to the school's accounting system by the School Business Manager or Administrator.

When the accounts for each financial year are closed, a final statement from the school's accounting system must be presented to the next meeting of the Resources Committee.

6. PAYROLL

6.1 Starters/variations/leavers

All forms for:

- setting up new employees on the payroll (starters)
- effecting variations to pay
- taking existing employees off the payroll (leavers)

must be made out by the School Business Manager or Administrator and authorised (electronically) by the Headteacher, or in his or her absence, the Chair of Governors. Such forms must then be actioned via the Schools' Launchpad Portal promptly to Shire Hall.

6.2 Time Sheets

All time sheets submitted by a member of staff must be checked initially by the School Business Manager or Administrator and then authorised (signed) by the Headteacher, or in his or her absence, the Chair of Governors. Authorised time sheets must be actioned via the Schools' Launchpad Portal to Shire Hall and never handed back to the employee (filed in the School Office).

6.3 Checking of Payroll Data

Payroll data received monthly from Shire Hall must be scrutinised by:

- The School Business Manager or Administrator and Headteacher to ensure all employees are recognised and pay appears reasonable (no detailed check) within 2 weeks of the end of the month during term-time
- The School Business Manager or Administrator to check accuracy of pay calculations.

6.4 Pay-related Expenses

All pay-related expenses must be processed through the payroll system. Pay-related expenses must never be paid via petty cash or by the creditor payment system. If any doubt exists about whether an item should be processed via the payroll system the Payment and Income Control section at Shire Hall must be contacted for advice.

6.5 Supply Teachers

The Full Governing Body will decide on the basis of advice from the Headteacher whether supply teacher insurance cover shall be taken out and the extent of the cover.

All claims submitted by supply teachers must be authorised (signed) by the Headteacher, or in his or her absence, the Chair of Governors.

Reimbursement claims must be submitted on a monthly basis by the School Business Manager or Administrator.

The School Business Manager or Administrator must check on a monthly basis that correct amounts have been charged as per the Shire Hall expenditure printout.

7. SCHOOL FUND

7.1 Accounts

The accounts of the School Fund are to be maintained on a day to day basis by the School Business Manager or Administrator. All income and expenditure will be entered promptly in the accounts. A bank reconciliation will be performed monthly when bank statements are received between the balance as per the accounting record and the balance as per bank statements.

The School Fund will have Cheque and debit card provision to minimise petty cash problems and management.

7.2 Debit Card

The school debit card is only authorised for use by the School Business Manager and Head teacher and will be used for purchasing online and to avoid petty cash transactions when buying fresh items. All use of the debit card will be offset via the school budget account using the invoice procedure to reimburse the funds from the correct cost centre budget allocations.

All transactions using the debit card will have a paper trail using current school ordering processes.

7.3 Signatories

The following are allowed to sign cheques on the bank account:

- Headteacher;
- Chair of Governors or another appointed Governor; or
- School Business Manager or Administrator.

There must be two signatures on each cheque.

7.4 Final Accounts and Audit

Final accounts are prepared at the end of the School Fund financial year by the School Business Manager or Administrator. The accounts will be audited by an auditor appointed by the full Governing Body. The auditor will not be a member of the Full Governing Body. In appointing an auditor and operating the Fund, the Governors will follow the instructions laid down in the County Council's Manual on Unofficial Funds.

The audited accounts should be presented to the Full Governing Body for approval. Governors' approval must be recorded in the minutes of the meeting. Once approved, the Clerk to the Governing Body will return the requested form to Shire Hall in the format required by the Education Department.

School Fund monies must be kept and recorded separately from the school's capitation monies and securely held.

8. ASSETS

8.1 Inventory

The portable, desirable, attractive assets of the school, as well as any assets of intrinsic value (eg antiques) will be recorded in the school's inventory. Full details (make, model, serial number, approx value) shall be recorded.

The School Business Manager or Administrator is responsible for keeping the inventory up to date by adding new items when they are received into school.

Items up to a current value of £250 may be sold or written out of the inventory on the authority of the Headteacher.

For items over £250, the Full Governing Body must authorise this and details must be recorded in the minutes.

Reasons for writing out or selling must be recorded in the inventory, together with the Headteacher's signature (up to £250) or the Governors' minute reference (£250 and over). An official receipt for sales income must be issued to the purchaser.

Inventories shall cover all areas of the school and be arranged on a room by room basis. A separate inventory will be maintained to include items which are not allocated to a specific room.

The inventory shall be checked against the actual assets by the Headteacher and the School Business Manager or Administrator on an annual basis. Any discrepancies shall be investigated immediately and if necessary the Governors, Police and the authority's auditors shall be informed. The check shall be evidenced by both the Headteacher and the School Business Manager or Administrator signing and dating the inventory. All inventory items should be security marked:

- invisibly with an ultra-violet pen/smartwater, and
- visibly with warning stickers

8.2 Off-site Register

Any inventory items taken off-site by members of staff for official purposes must be recorded in a register. The date borrowed, and the signature of the borrower, must be recorded. On the return of the item the date of return will be recorded. Members of staff with designated laptop computers and other equipment, eg mobile phones, must sign to accept responsibility.

9. INCOME

9.1 Credit Income

Credit income is where payment for goods/services provided by the school is made after the provision takes place.

An official invoice must be raised by the School Business Manager or Administrator in all cases and signed by the Headteacher and sent to the debtor as soon as possible after the provision of the goods/service, and no later than one week after the provision.

A file of copy invoices will be maintained by the School Business Manager or Administrator; this will be arranged into 'paid' and 'unpaid' invoices. The copies of unpaid invoices will act as a control record for the sending of reminders and the chasing of unpaid debts.

Reminders will be sent after the following periods if the debt remains outstanding:

- 1st reminder 30 days
- 2nd reminder 60 days
- 3rd Reminder with legal letter 90 days

If after 180 days the debt remains unpaid, consideration will be given by the Headteacher and/or Governors to writing the debt off in accordance with the following limits:

- up to £50 Headteacher to authorise write-off
- £50-£100 Chair of Governors to authorise
- £101-£1,000 Full Governing Body to authorise
- £1,001 and over Local Authority must authorise

In each case, the possibility of taking legal action to recover the debt must be considered by the Headteacher, Chair and Governors as appropriate.

As well as sending formal reminders, efforts must be made by the school to contact the debtor in order to secure recovery of the debt. If payment has not been received after 28 days of raising the invoice, no further goods or services must be provided until the outstanding debt is settled.

When an invoice is paid, details of the payment must be written on the copy invoice, and this transferred to the paid section of the file. An official receipt should be issued to the debtor and the receipt number written on the copy invoice; a duplicate copy of the receipt must be retained at school.

9.2 Cash Income

This is where payment is received at the time goods/services are provided.

An official receipt must be issued to the payer at the time the payment takes place and a duplicate copy retained at the school.

The School Business Manager or Administrator will seek wherever possible to encourage the use of electronic payment to reduce the number of cash payments to enable accurate record keeping/reconciliation

9.3 Banking

All income received (cash or chq) must be banked at **HSBC Bank** promptly and intact. No payments may be made out of income collected. A record to evidence the banking must be kept (eg stamped paying-in slip).

9.4 Charging Policy

The Full Governing Body will set a charging policy to cover:

- lettings
- school trips
- music tuition
- private photocopying
- private telephone calls

The charging policy is reviewed annually by the Governing Body. Charges levied by the school will be in line with this policy.

9.5 Donations

Donations from any source must be acknowledged by the issue of an official receipt to the payer. All donations must be banked promptly and intact.

9.6 Official Capitation and School Fund Income

All income used to offset expenditure incurred on the capitation budget (eg lettings, photocopying, telephone calls, music tuition, sales of work) must be paid into the official County Fund² at least half-termly and coded to an appropriate income code. Monies received from any sales of school equipment must similarly be paid into the County Fund.

Donations may be paid into the County Fund or the School Fund dependent upon the wishes of the donor, which must be ascertained beforehand.

9.7 Cash Received From Pupils

Cash received from pupils in class must be handed over to the School Administrator frequently. The School Administrator will issue an official receipt for the income.

9.8 Security of Receipt Books and Tickets

All unused receipts and tickets to be used to acknowledge receipt of income must be held securely in the school office.

10. PURCHASING

Because the School is using public funds, it is vital that we achieve the best value for money we can from all of our purchases, whether they are for goods or services. In this context, value for money is about getting the right quality at the best available price in an efficient and timely manner.

Quotations should always be sought from:

- preferred and approved suppliers, including but not exhausting GCC approved suppliers;

This often means looking further ahead than the immediate purchase, especially when selecting equipment, and taking into account associated costs such as supplies and maintenance. It is also important that contract specifications contain detailed service and quality provisions.

² The County Fund is currently with HSBC with a debit card. It is a petty cash fund that staff can request be used for small items such as book purchases from Amazon.

10.1 Ordering

School procedures for purchasing should ensure that purchases are as required and are for bone-fide purposes.

Orders should be processed by the School Business Manager or Administrator after initial approval and signature by the Headteacher has been sought and given. The official order or copy order produced from the computer system must be signed by the budget holder before it is sent to the supplier. If an order has been placed over the telephone an official confirmatory order must be sent.

Official orders must not be used to procure goods for private purposes.

Official order stationery must be held in a secure location.

Copies of all official orders placed must be retained on file at the school by the School Business Manager or Administrator.

When placing orders it is the responsibility of the initiator to ensure that Gloucestershire County Council Accounting Instructions are adhered to.

10.2 Quotations/Tenders

For orders for goods/services under £50,000:

- For less than £2,000 requires Headteacher approval only
- £2,000 - £5,000 at least three prices to be examined and retained, these prices may be taken from suppliers' written quotations or catalogues/price lists and provided with manufacturer part codes where possible. Where applicable these must be provided to the Full Governing Body and a record kept.
- £5,000 - £50,000 independent written evidence of at least three prices should be obtained and retained and provided with manufacturer part codes where possible. These must be provided to the Full Governing Body and a record kept

Independent written evidence means quotations provided on suppliers' headed notepaper.

For orders for goods/services over £50,000 - tenders should be invited in one of three ways:

- from at least three contractors included on a standing list; or where no standing list exists
- from at least three appropriate contractors, or
- by open competition by advertisement in local newspaper or appropriate journal

10.3 Governor Involvement

As well as ensuring that the above have been adhered to, it is the responsibility of the Headteacher to ensure that Governors are consulted in the following circumstances:

- On purchasing decisions when the estimated cost is less than £1,000 there is no requirement for Governor involvement.
- On purchasing decisions when the estimated cost is greater than £1,000 and £5000, the Full Governing Body must be consulted.

10.4 Receipt of Goods

Once items ordered have been received, the School Business Manager or Administrator must ensure that items delivered correspond to details contained in the delivery note. Upon examination of goods the School Business Manager or Administrator must ensure that both quality and quantity are appropriate.

The School Business Manager or Administrator will also be responsible for registering warranties for items and documenting them accurately.

All inventory items should be;

- security marked
- invisibly with an ultra-violet pen/smartwater;
- visibly with warning stickers; and
- added to the School Inventory Database:

10.5 Invoice Check and Authorisation

Invoices received must be checked to both copy orders and delivery notes to ensure that invoices relate to goods ordered and delivered. Invoices should also be checked for arithmetical correctness. All invoices must be certified for payment by the Headteacher before being passed for payment (or in the Headteacher's absence, the Deputy Head).

Invoices passed for payment must be recorded promptly in the school's accounting system by the School Business Manager or Administrator.

10.6 Petty Cash

Day to day operation of the petty cash account is the responsibility of the School Business Manager or Administrator.

All petty cash expenditure and reimbursement income must be promptly recorded in the petty cash record.

Reimbursement must be claimed monthly or when one-half of the imprest advance has been used. The Headteacher (or Chair of Governors in the Head's absence) must certify the reimbursement claim.

Each month, on receipt of the bank statement, the School Business Manager or Administrator must complete a reconciliation ensuring that cash expended, plus cash in hand or at bank equals the amount of the advance.

All members of staff who wish to purchase items from the petty cash account must obtain prior approval from the Headteacher. Vouchers (receipts, paid invoices, etc) to evidence the payment must be presented to the School Business Manager or Administrator by members of staff when reclaiming cash from the account. These vouchers must be retained by the School Business Manager or Administrator and returned with the reimbursement claim.

In normal circumstances, individual purchases from petty cash must not exceed £30. In exceptional circumstances, payments up to £50 may be made with the express prior approval of the Headteacher. Such payments should be for emergencies only and should not simply result from a lack of planning. Petty cash held by the School should not exceed £200 at any one time.

All cash and cheque books must be retained securely.

10.7 Use of Term Contractors (Maintenance Work)

If the LA approved Term Contractors are used for maintenance work up to the value of £2,500 the school need not seek competitive quotations to comply with Accounting Instructions. Tendered daywork rates are published in the logbook (updated annually) which premises managers can use to compare prices when ordering works. They will then be deemed to have compared three prices in accordance with standing orders and financial regulations. However, if the Headteacher and/or Governors wish to obtain quotes in competition with the Term Contractors, then this may be effected.

11. REGISTER OF PECUNIARY AND OTHER INTERESTS

The school shall maintain such a register.

11.1 Persons to be included

- All Governors
- Headteacher
- All senior staff (eg Deputy Head, SENCo, senior administrative staff e.g. School Business Manager or Administrator)

11.2 Interests to be Recorded

The basic principle to be followed is that any interest should be recorded which could be seen to improperly influence any decisions taken, pecuniary or otherwise, regarding the operation of the school.

Examples of such improper influence might be:

- to purchase goods or materials from a company in which a Governor/senior member of staff has a financial interest without going through the correct procedures for obtaining competitive prices.

- promoting a member of staff who has a close personal relationship (spouse, partner, son, daughter, etc) with Governor/senior member of staff without going through correct procedures for recruitment and selection.

There can never be a definitive, comprehensive list of the interests which should be recorded, but the following is intended to give some guidance:

- having a financial or other interest in an organisation which could feasibly be in a position to supply goods/services to the school, for example:

building contractors
plumbing contractors
electrical contractors
audio/visual goods suppliers (eg TVs, video recorders, etc)
repair/maintenance of equipment (electrical and other)
suppliers of computer hardware and software
suppliers of stationery
suppliers of educational equipment (eg PE equipment)
suppliers of furniture, fittings, carpets, curtains, etc
decorating contractors
catering contractors
suppliers of provisions
suppliers of clothing
suppliers of building materials
suppliers of catering equipment
suppliers of fuel
suppliers of vehicles
suppliers of books
grounds maintenance contractors
gardening contractors
suppliers of grounds/garden maintenance equipment
suppliers of plants, trees, seeds, etc
suppliers of heating equipment
suppliers of musical instruments
suppliers of insurance
consultant (eg legal, financial, training, property)
suppliers of security services and supplies
suppliers of art materials
suppliers of telecommunications equipment
suppliers of photographic equipment
transport contractors (eg coaches, taxis, etc)
holiday/travel operators
suppliers of supply teaching cover
suppliers of peripatetic teaching
suppliers of banking services
suppliers of workshops etc (eg drama, music)

- the interest in the above ‘supplying organisations’ may for example be:
 - as a director
 - as an employee
 - as a major shareholder
 - as a major investor
 - as a major debtor/creditor
 - having a close personal relationship (spouse, partner, son, daughter, etc) with a person in the above categories.
 - being in a position to potentially influence decisions made about the school, eg as member of local council (County Council, District Council, Parish Council officer of Local Education Authority in a senior capacity
 - Member of Parliament
 - OFSTED Inspector
 - officer of local council (District Council, Parish Council) in a senior capacity
 - having a close personal relationship (as described above) with any person falling into the above categories.
 - having a close personal relationship with a Governor or member of staff (employed on a full-time, part-time, permanent or temporary basis).

12. Debit / Credit Card Usage

The school has a credit / debit card which has been set up and is used via the school fund account held with Lloyds Bank. The use of the card has been approved by the Governing Body and formally recorded in the minutes of the resource committee meeting held on Monday 1st February 2016.

The authorised users of the card and their financial limits of delegated authority (including monthly spend restrictions) are outlined below:-

Headteacher £3000 – monthly limit
 School Business manager £3000 – monthly limit

The issue and control of the card is managed by the School Business Manager.

Cardholder(s) have been issued with associated notes of guidance, have signed to acknowledged their receipt of the card and to agree to the terms of using the card.

The debit card is held securely when not in use by the cardholder in a secure location where there is limited access.

Any misuse of the card(s) outside of the conditions of use will result in the immediate withdrawal of the card from the cardholder.

The Headteacher will take appropriate action in line with the County Council’s financial regulations.

The loss of any card(s) will immediately be reported to the bank and School Business Manager and Head teacher.

If the card is no longer required or the cardholder leaves the school they shall be returned to the School Business Manager/Head teacher and destroyed in accordance with accepted procedures.

Card will not be used for the withdrawal of cash through any ATM or cash back facilities. In exceptional circumstances cash may be withdrawn with prior approval of the Headteacher.

School debit card must not be used for personal purchases.

The use of school debit cards for ordering goods and services shall operate in conjunction with the principles of best value.

The debit card should not be used until confirmation has been made with the Head teacher. Confirmation should also be sought from the School Business Manager that there are sufficient balances in the bank account prior to the use of card.

A record of expenditure incurred together with supporting vouchers or receipts should be maintained by the cardholder, including a valid VAT receipt where relevant. These should be submitted to the Headteacher for the purpose of checking payments made.
Debit card payments should be debited directly from the school fund account

Rodmarton Primary School Debit Card [“the Card”] Cardholder Consent Form

I consent to be a cardholder on the following debit account held by Rodmarton Primary School [“the School”]

Debit Card Issuer: Lloyds Bank PLC

Card Number: _____

I confirm that I have read the Rodmarton Primary School Debit Card Policy [“the Policy”] and that I will abide by its terms and conditions.

In particular I acknowledge and agree that:

1. I will use the account only to purchase items/services on behalf of the School and not use the account for any personal expenditure
2. I will only purchase items/services in accordance with the Policy.
3. I will take care of the card whilst in my possession to avoid its loss or theft.
4. I will not disclose to any other person, or write down, the Card PIN number.
5. I will only use the Card security number for online purchases where a security number is requested and only on a secure (indicated by padlock symbol) Internet website
6. I will not use the Card to withdraw cash
7. I understand that upon discovery of loss or theft of the Card, I must as soon as possible notify:
 - a. the issuing bank; and
 - b. the Bursar or Headteacher; and
 - c. the police (only in the event of theft)
8. I understand that I am personally liable for all charges on the Account which relate to transactions which have not been conducted in accordance with the Policy.
9. I accept that I must reimburse the School promptly should I cause the Account to incur any unauthorised charges [“Unauthorised Charges”] and in the absence of prompt reimbursement, I authorise the School to recover all unauthorised Charges by deduction from any amounts otherwise owing to me by the School , including but not limited to salary and expenses.

10. I agree that, when not required for purchases, I will return the Card for safekeeping in the School safe, to either the Office Manager or the Bursar.
11. I agree that if I cease to be employed by the school I will return the card to the Headteacher

Agreed by	Authorised by
Name :	Headteacher :
Date	Date
Signature	Signature

13. POLICY REVIEW

This Finance Policy shall be reviewed annually by the Resources Committee, with any recommended changes approved by the Full Governing Body.