

General Welfare Requirement: Organisation

Providers must plan and organise their systems to ensure that every child receives an enjoyable and challenging learning and development experience that is tailored to meet their individual needs.

Finance

4.10 Payment of Fees

Policy Statement for St Joseph's Pre-school

Statement of Intent

To ensure that the rules of payment of money owed to St Joseph's Pre-school are clear to all. The Pre-school is a charity and not for profit. All fees are used to ensure the running of the setting and it is in the best interests of every child that fees are paid promptly and fully so they can benefit from consistency of care and routine. It also enables staff to concentrate on your child and, where applicable, other governance matters, thus not being distracted chasing unpaid fees and impacting on the rewarding pre-school experience we aim to offer your child.

The Committee recommends that children attend a minimum of 2 separate sessions a week. This minimum attendance enables us to support the child settling into the setting and helps practitioners to get to know the child/ren. Days/times will be dependent on spaces available and staff to child ratios. For example:

- two morning sessions, ie. 9am to 12 noon and/or 9am to 1pm; or
- two afternoon sessions, ie. 12 noon to 3pm and/or 1pm to 3pm; or
- a combination of the above two (but not on the same day); or
- two full day sessions, ie. 9am to 3pm; or
- a combination of part and full sessions, ie. one morning/afternoon (as above) **and** one full day (9am to 3pm)

Please talk to the Lead Practitioner in the first instance.

Definitions

- "Funded sessions" are a child's hours covered by the Nursery Education Grant Funding (NEF). St Joseph's Pre-school "funded sessions" are those between 9am to 3pm Monday to Friday (term time only). The Pre-school is able to accept:
 - 9-23 month old funding for eligible working parents (15 hours funding). This funding is income related. Visit www.beststartinlife.gov.uk to find out if you are eligible and how to apply;
 - Disadvantaged 2 year old funding for eligible children (15 hours funding). Visit glosfamiliesdirectory website to check if your child may be eligible;
 - Working Parent 2 year old funding (15 hours funding). This funding is income related. Visit www.beststartinlife.gov.uk to find out if you are eligible and how to apply;
 - 3 year old funding (15 hours universal funding) – no application needed, your child is automatically entitled to this funding from the funding term after their 3rd birthday until they start Primary School; and
 - Working Parent 3 and 4 year old funding (this funding is income related) giving an additional 15 hours extended funding on top of the 15 hours universal funding. Visit www.beststartinlife.gov.uk to find out if you are eligible and how to apply),

For all the above funding parents/carers will need to complete a Parent Declaration Form for each funding period their child attends the setting.

- “Non-funded sessions” are a child’s hours not covered by NEF. This could be because the child is not currently eligible for funding or the hours are over and above the regular NEF hours the child attends and recorded on GCC’s nursery portal for the term.

Nursery Education Grant Funding (NEF)

- St Joseph’s Pre-school are registered to receive *NEF* which is paid by Gloucestershire County Council. Children who are eligible can receive funding from the term following their 9 month anniversary.
- The Pre-school is open 39 weeks/year and NEF covers 38 weeks/year. Within these 39 weeks there are five Inset Days. If funding is received for your child for an Inset Day, ie. a normal day of attendance for your child, this will be credited to the unfunded week. If your child would not normally attend on an Inset Day or if there are any hours over and above the regular funded hours attended, then there may be fees due. For example, if your child attends on a Wednesday you may find that there are 39 Wednesdays in the academic year, since funding will only be received for 38 Wednesdays you will be invoiced for the additional hours at the Pre-school’s agreed hourly rate.
- The Pre-school keeps a log of funded hours for each child. If a child leaves the setting before the end of a pre-school year, the Treasurer and the Treasury Administrator will review funding received against registered hours and if applicable will charge for any shortfall with regards to the “unfunded” week. During Term 6 the Treasurer and the Treasury Administrator will review all funding for all children against hours attended (ie. registered hours), and if applicable will charge for any shortfall with regards to the “unfunded” week.
- Payment of chargeable hours is mandatory and cannot be offset by non-attendance since the place is reserved for your child.

When your child is 9 months old, or 2, 3 or 4 years old	Term when your child will be eligible to receive NEF funding	When to apply for funding
1 September to 31 December	Spring (1 January to 31 March 2019); - Terms 1 & 2	at least 14 working days before 31 August
1 January to 31 March	Summer (1 April to 31 August) - Terms 3 & 4	at least 14 working days before 31 December
1 April to 31 August	Autumn (1 September to 31 December) - Terms 5 & 6	at least 14 working days before 31 March

NB: St Joseph’s Pre-school only accepts children from the age of 2 years old.

- Funding can be used at any registered setting or with registered childminders. Parents can use their funding entitlement in a combination of settings or childcare arrangements.
- If your child is in receipt of funding you will be required to complete a Parent Declaration Form each term (Autumn, Spring and Summer), to enable St Joseph’s Pre-school to claim the funding direct from Gloucestershire County Council. For all funding except

“Disadvantaged 2 year old funding” you will be required to renew your child’s 11 digit eligibility code every 3 months – HMRC will send a remind email in the month prior to expiry (see below).

- St Joseph’s Pre-school are responsible for verifying (or confirming) eligibility by checking that the parent’s code included in the Extended Hours Declaration form is valid.
- Parents will be prompted every three months by HMRC to reconfirm that they remain eligible. If they are no longer eligible for 30 hours, they will enter a grace period and will be able to retain their place for a short period. The updated statutory guidance outlines the specific grace period cut-off dates. If a parent falls into their grace period before their child has started a 30 hours place, they should not take up their 30 hours place. Should a parent lose their eligibility St Joseph’s Pre-school are not responsible for paying/reimbursing any fees accrued, it is the parent’s responsibility to then pay the fees.
- St Joseph’s Pre-school currently opens for no more than 39 weeks in a school year. Our term dates are the same as St Joseph’s Catholic Primary School. We have five inset days during the 39 weeks, these correspond to five out of the six inset days set by St Joseph’s Catholic Primary School.
- On the funding form you will need to declare any NEF sessions being claimed elsewhere (e.g. at a day nursery, childminder or other pre-school). If you do not sign the form by the deadline, we will not be able to claim your child’s NEF entitlement until the headcount amendment task opens later in the term. Delay in applying may cause financial difficulties to the Pre-school.
- Once your form has been submitted, there is only one opportunity within each of the 3 terms to change your child’s hours and an amendment funding form will need to be completed. If you change your child’s hours outside this window, you will be charged for the extra hours your child attends.
- **IMPORTANT:** All hours claimed on the funding forms, be they for 9 to 23 month olds, 2, 3 or 4 year olds **must** match those shown in the register of attendance as registers will be inspected as part of the funding audit that GCC undertake¹. However, if a parent/carer works an irregular shift pattern, then they will not be disadvantaged from using the funding – please talk to the Pre-school in this respect. We require written confirmation from the employer of this shift pattern for our Treasurer records.
- **Non-attendance and funding:** As per our Local Provider Agreement with GCC, GCC will not claim back funding for any irregular attendance in a funding period. However, the Pre-school **does** need to inform them of any regular patterns of non-attendance so the matter can be reviewed for the following funding period. Children can be absent due to sickness or holidays for a period of up to 2 weeks before any funding will be recovered. In exceptional circumstances GCC will not claim back funding for a period of 2 weeks in cases where parents/carers do not give their correct notice period when leaving the setting.

Description of Payments

St Joseph’s Pre-school’s Committee endeavours to set fees at an appropriate level which does not disadvantage families who may struggle to meet them and are competitive and reflect the market in our locality. For those families with limited financial resources, a payment plan can be discussed with the Treasury Administrator and/or the Treasurer.

¹ As per para 13.10 Local Provider Agreement (latest version)

Reservation Fee²

To secure a child's place at St Joseph's Pre-school, an advanced payment of £30 is required. If 2 or more places are being requested by the same parent/carer, eg. for twins, then the first child will be charged at £30 and any subsequent siblings will be charged £15 each, even if their planned start date is not the same.

Your child's deposit will only be refunded where a child is receiving funding for all the hours they attend the setting between the hours of 9am and 3pm. If your child is in receipt of 15 hours funding but is attending 16+hours/week, the deposit will not be refunded, but if your child is in receipt of 15 hours funding and is attending those 15 hours/week and is also attending an Early Morning Session(s), then you will receive your deposit back. The refund will be made either:

- through a credit note via your child's half-termly invoice³ until the amount is used up; or
- if your child's hours are fully funded and there are no extra charges⁴ then you will receive a credit note for the amount and be asked to supply the Treasurer with your bank details to aid reimbursement⁵.

The deposit needs to be paid within 10 working days of confirming the requirement to secure the place(s). If the monies are not received within this period then the place(s) will not be held. In addition, in the event of a child/children not taking up their offered place(s), then the deposit(s) will be retained.

If you decide not to take up your child's place at St Joseph's Pre-school then we will retain the deposit⁶.

Half-termly invoice

All parents/carers of children attending St Joseph's Pre-school will receive a half-termly invoice regardless of whether there are any monies owed. The Pre-school's invoices adhere to the requirements of the Department of Education's guidance entitled "Early Education and Childcare (effective from 1 April 2025)".

For more information on the categories used on these invoices see 'St Joseph's Pre-school's invoices to parents/carers – explained' which can be downloaded from St Joseph's Catholic Primary School's website.

Term fees:

- A fee is charged per hour for all children that are not eligible for funding and for all hours over any government funding (statutory 15 hours universal entitlement and/or 15 hours extended entitlement).
- Funded hours will be the first hours of the week accounted for on termly invoices followed by unfunded hours (as applicable).
- Fees are reviewed each year by the Committee and would normally rise in September (in line with inflation), but the Committee reserves the right to change fees at any time of the

² As per EY GCC Business Support bulletin (5 December 2025)

³ I.e. hours over and above funded hours and early morning session (contract) payments

⁴ I.e. early morning session (contract) payments

⁵ Account name, sort code and account number

⁶ As per para 12.7 Local Provider Agreement (latest version)

year with advance notice of not less than four weeks given for any increase. From 1 September 2025 the Pre-school's flat fee rate is £6.15 per hour for all children.

- Staff are eligible to receive "benefit in kind" of a 10% discount on their child's half-termly invoice and any extra session invoices should they attend St Joseph's Pre-school.

Early Morning Sessions:

These run during term time only from 8.45am to 9am, i.e. before the normal Pre-school day. There are two options available to parents/carers.

- in advance: dates for the forthcoming term to be booked with the Lead Practitioner before the end of the previous term. From 1 September 2025 these will be charged at £2.40/session. These sessions will be included on your child's half-termly invoice;
- ad hoc: to be booked with the Lead Practitioner by the lunchtime of the working day before the date required. From 1 September 2025 these will be charged at £4.00/session. A separate invoice will be issued for these sessions payable within 7 working days of the date of the invoice.

These sessions cannot be paid for by NEF, EYPP or DAF⁷. NEF can only be used for hours attended during the normal Pre-school day, i.e. 9am to 3pm.

Late collection fees:

- A late collection fee is in place – separate invoices will be issued as applicable.
- If a child is collected between 5 and 9 minutes after their session has ended (i.e. 12pm, 1pm or 3pm), then a charge of £5 will be levied.
- Any child collected 10 minutes after their session has ended, their parent/carer will automatically be charged £5. Even if pre-school are notified, you will be charged unless you have informed pre-school at morning drop-off (i.e. 8.30am); then additional hour(s) will be charged only.
- If you are later than 10 minutes, an additional charge will be enforced at the discretion of the committee, this could either be an hourly rate or a higher rate of £10 for every subsequent 10 minutes. The reason for this is due to ratio in the pre-school, safeguarding the children and the availability of the room⁸.
- If late collection occurs on a regular basis, your child's place could be withdrawn.

Extra session(s)/extra days fees:

- Separate invoices will be issued for extra sessions/extra days attended by your child. Hours will be charged at the flat fee rate (see "Term fees") regardless of whether your child is entitled to NEF or not
- Additional days must be agreed by 1pm on the day before the requested day to ensure sufficient space and staffing is available.

Retention fee

The Committee reserves the right to charge a nominal non-fundable retention fee to those parents/carers whose child is not in receipt of funding, to enable them to retain their child's place at the setting. This will be in exceptional circumstance, e.g. closure of the Pre-school adhering to a Government requirement (as in March 2020 due to COVID-19).

⁷ NEF: Nursery Education Grant Funding; EYPP: Early Years Pupil Premium; DAF: Disability Access Funding

⁸ St Joseph's Out Of School Club uses the room before and after pre-school hours.

Requests for changes to attendance

NEF hours (2, 3 and 4 year olds)

- **A minimum of 6 weeks'** notice is required to delay your child's start date, change attendance days or to remove your child from St Joseph's Pre-school. Any requests for additional hours or change of hours must be submitted in writing, preferably by email to the Lead Practitioner and Treasurer. Please note that you will be liable for any fees incurred should inadequate notice be given, even if your child is eligible for NEF.
- The Committee recommends that children attend a minimum of 2 separate sessions per week. This minimum attendance enables us to support the child settling into the setting and helps practitioners to get to know the child/ren. See examples on page 1 with regards to sessions.
- Any changes to regular attendance hours can only take place at the start of the next term, unless there are extenuating circumstances affecting the child's welfare or the welfare of his/her parents/carers.
- Please note that there are 6 half-terms in a year. For funding purposes there are 3 terms in a year.
- If you are increasing the hours your child attends, you will receive a response as to when this can be accommodated within 10 working days of receipt of your request. The Pre-school reserves the right not to honor requests for increased hours if inadequate notice is given.
- However, it may not be possible to accommodate requests if the sessions are already full. If it is not possible to grant a request, the Lead Practitioner will keep a note that you are interested in that session should a space become available. Spaces arising in any session are offered in waiting list order.
- If you are looking to swap your child's hours around in any one week, then we will only accommodate this if staff ratios permit – and only if it is a 'one-off'. Note, however, that your original invoice for the Term will stand and the 'swapped hours' will be classed as an 'extra session(s)' and you will be invoiced accordingly.

Early Morning Sessions

Contract

- If your child has a half-termly contract with the Pre-school for these sessions then if, for some reason, your child cannot attend a session, then a minimum of 24 hours' notice, in writing, is required. To be emailed to the Lead Practitioner.
- If you decide your child will attend no further sessions, then a minimum of 48 hours' notice, in writing is required. Again, to be emailed to the Lead Practitioner.

Ad hoc

- If you have booked an ad hoc early morning session for your child, but they can no longer attend, eg. due to illness, then a minimum of 12-24 hours' notice, in writing, is required. To be emailed to the Lead Practitioner.

Rules of Payment

- The Treasury Administrator will issue an invoice within two weeks of the start of a term, stating a due date. If it is not possible to pay the fees immediately and in full, then it is the parent/carer's responsibility to agree a payment plan with the Treasurer/Treasury Administrator (who will confer with the chair and staff).
- Invoices for extra sessions are issued on the day or when booked. Payment of these are required within 7 working days of the date on the invoice.

- Invoices for ad hoc Early Morning Sessions are issued when they are booked. Payment of these are required within 7 working days of the date of the invoice.
- Invoices for late collection are issued on the day and payment is required within 7 working days of the date on the invoice.
- St Joseph's Pre-school's preferred method of payment is by BACS (bank transfer). Bank details are given on the invoice. Parents must use their child's name as a reference and send an email to the Treasury Administrator to confirm payment.
- St Joseph's Pre-school accepts childcare vouchers. Parents must use their child's name as a reference and send an email to the Treasury Administrator to confirm payment.
- Cheques, made out to 'St Joseph's Pre-school', and cash are accepted. Please hand in person to the Lead Practitioner in a sealed envelope addressed to the Treasurer with your child's name as a reference and purpose and amount of payment.
- Parents will be reminded, during the term, that their child's invoice is outstanding (if applicable).
- Concessions cannot be made for absences as the pre-school cannot fill a child's space with another child.

Non-payment of fees

If payment for any invoices, ie. half-termly, extra sessions, early morning sessions and late fees etc, are not received by the requisite due dates, then the Treasury Administrator and/or Treasurer will refer to the Pre-school's Debt Procedure⁹ to recover monies owed.

Once all outstanding monies have been paid then reinstating any non-funded hours or increasing NEF hours or the booking of extra sessions can be discussed – dependent on space and staff availability.

Following a £15 late payment charge within a pre-school year, extra sessions will need to be paid for in advance of attendance. You can either settle the balance

- via the pre-school bank account at least 24 hours before the extra session, with confirmation by email to the Treasury Administrator and the Lead Practitioner with a screen shot of the payment. This is the Pre-school's preferred method of payment; or
- in cash or cheque (made payable to St Josephs Preschool) direct to the Lead Practitioner. This must be in a sealed envelope, addressed to the Treasurer, with the child's name and the reason for and amount of payment.

Refunds

- Refunds will **not** be made for absence through illness, holidays or other, including weather conditions apart from exceptional circumstances (at St Joseph's Pre-school's discretion), as the running costs of the Pre-school remain the same.
- Refunds will **not** be made where a child leaves or reduces their weekly sessions after the initial invoice has been issued.
- Refunds will **not** be made for school trips/outings as St Joseph's Pre-school is still required to pay staff, rental of facilities and associated costs.
- Refunds will be issued for paid fees (not funded placements) when St Joseph's Pre-school closes a planned session, with prior notice by letter given 48 hours before the session.

⁹ 4.10.3 Debt Procedure

- Refunds will be arranged by the Treasurer and/or Treasury Administrator, by deducting from the next month's invoice, or by BACS or cheque, this will be discussed between the parent and the Treasurer/Treasury Administrator.
- If the Pre-school has to close due to Government requirements (e.g. as in March 2020 re COVID-19 pandemic) then the Emergency/Temporary Closure policy¹⁰ will be followed. If refunds are applicable (non-funded places only), then parents will be informed accordingly.
- If the Pre-school is open and other educational establishments are closed/partially closed, for example due to industrial action, and a parent decides not to send their child in, a refund will **not** be made (non-funded places only).

Further guidance

- Gloucestershire Local Provider Agreement "Early Years Funded Entitlements for 9 to 23 months old, 2, 3 & 4 year-olds"
- www.beststartinlife.gov.uk
- [St Joseph's Pre-school's Invoices to parents/carers – explained](#)

Associated policies and procedures

- 4.3 Parent Pack (latest update).
- 4.10.3 Debt Procedure
- 4.1 Admissions

Version Number	Author	Purpose of change	Date
1.0	E Kemp	Update re. 15 hour extended entitlement	Nov 2017
2.0	K Coupe	Review & update re preferred payment method	19/9/2018
3.0	K Coupe, N Powers & A Wand	Update re. ad hoc swapping of hours, funding amendment form and written clarification of 2 year old funding, NEF forms must match attendance	1 May 2019 Committee meeting
4.0	K Coupe	Amendment wording about the "benefit in kind" available to committee members and staff	10 July 2019 AGM
5.0	K Coupe	Inclusion of paragraph with regards to non-attendance and funding, "late fees" updated and addition of a retention fee	06 Aug 2020 Committee Meetingg
6.0	K Coupe, A Shipton, A Hitchings	More clarity given to the process to be followed with regards to non-payment of fees.	28 Jan 2021 Committee – via email
7.0	K Coupe S Turner A Shipton	Updated to reflect change from 2-tier hourly rates to flat fee from 1 September 2021. Also more clarification about applying for 30 hours extended entitlement and non-payment of fees.	01 April 2021 Committee – via email
8.0	K Coupe	Removal of reference to 2-tier hourly rates prior to 1 Sept 2021	08 July 2021 Chair
9.0	K Coupe	Within "Description of Payments" the inclusion of a paragraph regarding the "Refundable Deposit" introduced from 1 January 2022	25 Nov 2021 Committee Member (T Clapp)
10.0	K Coupe &	Updated as follows:	12 May 2022

¹⁰ Policy 39 Emergency/Temporary Closure

Version Number	Author	Purpose of change	Date
	L Farrer	<ul style="list-style-type: none"> • Deletion of wording stating that Committee members are eligible for a “benefit in kind” (5% discount) on child invoices as applicable – as per DBS advice Inclusion of “further guidance” section. Inclusion of “associated policies and procedures section as per EY safeguarding audit (section 175/157); 	Committee Member (M Montgomery)
11.0	K Coupe & L Farrer	<p>Updated as follows:</p> <ul style="list-style-type: none"> • Inclusion of wording “(in line with inflation)” regarding September pay review. • Inclusion of new debt procedure in list of associated policies and procedures. • Inclusion of wording with regards to changing hours because of extenuating circumstances. “Associated policies and procedures” section updated accordingly. • Amendment of flat fee hourly rate to £4.95 from 1 September 2022 	26 Aug 22 Committee Member (G Ind)
12.0	K Coupe & L Farrer	More clarification with regards to the refundable deposit particularly with regards to twins etc.	05 Nov 2022 Committee Member (L Finn)
13.0	K Coupe	<p>Updated to</p> <ul style="list-style-type: none"> • include reference to mandatory nappy disposal charge (starting from Term 5); • confirmation that no refund given if child does not attend when setting open if, for example, there is industrial action and other siblings schools are closed/partially opened. 	28 Feb 2022 Committee Member (S Webb)
14.0	L Farrer & K Coupe	Updated to reflect the Pre-school’s new Debt Procedure and to correspond with the Procedure in relation to Extra Sessions.	30 April 2023 Chair (A Hitchings)
15.0	K Coupe	Updated to reflect the increase in the hourly rate (flat rate) from 1 September 2023	06 June 2023 Chair (A Hitchings)
16.0	K Coupe	Wording confirming that funded hours will be allocated first on invoices followed by any unfunded hours.	12 July 2023 Chair (A Hitchings)
17.0	K Coupe & L Farrer	Updated to include information on Early Morning Sessions	09 Oct 2023 Committee Member (S Webb)
18.0	K Coupe	<p>Update to</p> <ul style="list-style-type: none"> • reflect the introduction of “Working Parents 2 year old funding” from 1 April 2024 • minimum number of sessions a child can attend the setting, if there is a reduction in hours; 	01 May 2024 Committee Member (J McFarling)

Version Number	Author	Purpose of change	Date
		<ul style="list-style-type: none"> • clarification under “Requests for changes to attendance” re Early Morning Sessions and the minimum notice period required for contract and ad hoc sessions and who to notify in writing. • to confirm that a minimum of 2 separate sessions are required to be booked/attended in order for a child to retain a place at the setting 	
19.0	K Coupe	Updated to: <ul style="list-style-type: none"> • reflect rate changes from 1 September 2024 as agreed at 20 June 2024 Committee meeting • confirmation that from 1 September 2024 the setting can accept 9 to 23 month old funding for eligible 2 year olds. 	04 July /2024 Treasurer (L Farrer)
20.0	K Coupe & L Farrer	Updated wording under “Refundable Deposit” section to explain about credit notes and deposit reimbursement. Plus no refund of deposit if child fails to take up the place	18 Sept 2024 Chair (A Hitchings)
21.0	K Coupe & L Farrer	<ul style="list-style-type: none"> • Updated wording under “Nursery Education Grant Funding (NEF)”, confirming that, primarily in the Autumn term, parents/carers will be charged for days not covered by funding (as applicable) • Amended wording re nappies and disposable nappy charge as per DfE Statutory Guidance “Early Education and Childcare (effective from 1 April 2025)” 	11 March 2025 Committee Member (S Long)
22.0	K Coupe & L Farrer	<ul style="list-style-type: none"> • Footnote inserted re DfE Statutory Guidance “Early Education and Childcare (effective from 1 April 2025)”; “Benefit in Kind” increased to 10% as per minutes of Committee meeting on 19 June 2025 • unfunded with agreed rates from 1 September 2025 for unfunded hours, Early Morning Session contracts and ad hoc, voluntary nappy disposal charge. 	21 July 2025 Chair (A Hitchings)
23.0	K Coupe	Deleted references and hyperlinks to www.childcarechoices.gov.uk which replaced with www.beststartinlife.gov.uk , a parent hub	9 Sept 2025 Committee Member (G Ind)
24.0	K Coupe	Updated in light of GCC EY Business Support advice re half-termly invoices to funded parents. Review of wording in NEF section.	11 Nov 2025 Treasurer (L Wilson)
25.0	K Coupe	More clarification of why we stipulate a minimum of 2 sessions attendance per week	18 Dec 2025 Committee Member (H Heaven)
26.0	K Coupe	Updated in line with <ul style="list-style-type: none"> • advice from EY GCC Business Support (bulletin 5 December 2025), with regards to “reservation fee” repayment; and 	8 Jan 2026 Chair (A Hitchings)

Version Number	Author	Purpose of change	Date
		<ul style="list-style-type: none"> discussions with EY GCC Business Support and funding team with regards to charging for any unfunded hours re the “unfunded week”. 	
27.0	K Coupe	Removal of the voluntary nappy disposal charge on advice of GCC EY Business Support.	9 February 2026 Committee Member (L Finn-Powers)