

The Cam Academy Trust

Financial Procedures Manual

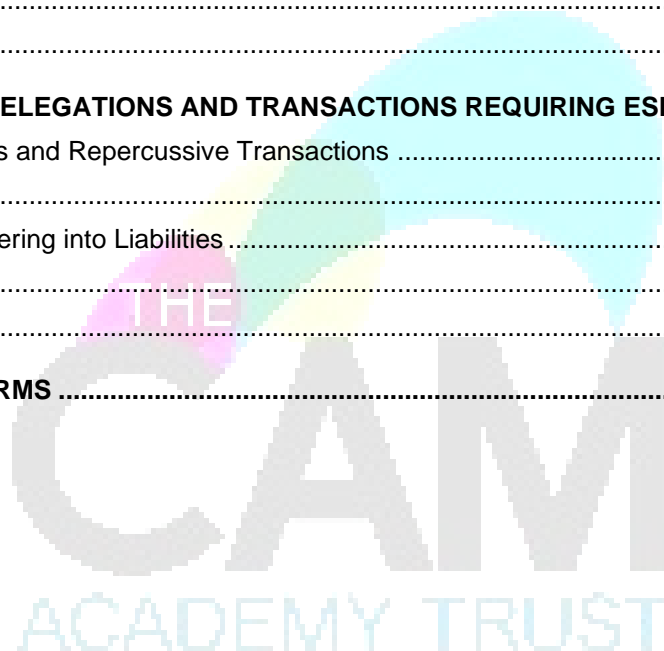
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INTRODUCTION

The purpose of this manual is to ensure the Trust maintains and develops systems of financial control which conform to the requirements both of propriety and regularity. It is essential these systems operate properly to meet the requirements of our funding agreement with the Education Secretary.

The Trust is required to comply with the principles of financial control outlined in the guidance published by the DfE in the Academy Trust Handbook. Furthermore, the Trust must be able to show that public funds have been used as intended by Parliament. This manual expands on that and provides detailed information on the Trust's accounting procedures. The manual should be read by all staff involved with financial systems.

RESPONSIBILITIES

Introduction

The Trust has defined the responsibilities of each person involved in the administration of Trust finances to avoid the duplication or omission of functions and to provide a framework of accountability for trustees, governors and staff.

The Board of Trustees has identified the skills and experience it needs, including sufficient financial knowledge to hold the executive to account. They have also addressed this for committees, local committees, and local governing bodies.

The Board of Trustees is aware of the DfE's guidance about Trust Quality Descriptors and strives to demonstrate these by its actions.

The Seven Principles of Public Life

The Trust is committed to the 'seven principles of public life' and the ESFA has emphasised that Accounting Officers must adhere to these. These are:

- Selflessness. Holders of public office should act solely in terms of the public interest.
- Integrity. Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.
- Objectivity. Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.
- Accountability. Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.
- Openness. Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.
- Honesty. Holders of public office should be truthful.
- Leadership. Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

Definitions

The Meaning of 'Board of Trustees'

Is the Board of Trustees appointed to direct the policies of an educational institution/s.

The Meaning of 'Member'

The members of an academy trust have a different status from the trustees. The members are the subscribers to the trust's memorandum of association (where they are founding members) and any other individuals permitted to become members under its articles of association.

Members:

- May amend the articles subject to any restrictions created by the funding agreement or charity law.
- May, in certain circumstances, appoint new members or remove existing members.
- Have powers to appoint and remove trustees in certain circumstances.
- May, by special resolution, issue direction to the trustees to take a specific action.
- Appoint the trust's auditors and receive the audited annual accounts (subject to the Companies Act).
- Have the power to change the company's name and, ultimately, wind it up.
- The academy trust must have at least three members, although the DfE's strong preference is that trusts should have at least five members.

Employees cannot be members. Members must not be employees of the trust, nor occupy staff establishment roles on an unpaid voluntary basis. This requirement was effective from 1 March 2021.

The Trust must ensure that the members are not subject to a direction made under section 128 of the Education and Skills Act 2008. Also, they may not appoint as a member anyone who is currently subject to a section 128 direction.

The DfE's strong preference is for a majority of members to be independent of the Board of Trustees.

As responsibility to conduct the trust's business sits with the trustees, members should be 'eyes on and hands off' and avoid compromising the Board of Trustees' discretion.

It is important for members to be kept informed about trust business so they can be assured that the board is exercising effective governance. This must include providing the members with the trust's audited annual report and accounts.

The Meaning of 'Trustee', 'Director' and 'Governor'

The trustees are the same body of people as both the Directors of the company and the 'Governors' of a single Academy Trust. These words are used interchangeably.

They are the people responsible under the Academy Trust's articles of association for controlling its management and administration. They have responsibility for directing its affairs, and for ensuring that it is solvent, well-run, and delivering the Trust's charitable outcomes for the benefit of the public.

The trustees must ensure regularity and propriety in the use of the trust's funds, and achieve economy, efficiency and effectiveness – the three elements of value for money. The trustees must also take ownership of the trust's financial sustainability and its ability to operate as a going concern.

All single trusts should have reserved places on the board for at least two elected parents. A MAT must have places reserved either for at least two elected parents on the Board of Trustees or two elected parents on each Local Governing Board (LGB) where the trust has established them.

The academy Board of Trustees has a duty to:

- Safeguard and promote the welfare of children.
- Have regard to any statutory guidance on safeguarding issued by the Education Secretary.
- Ensure the suitability of staff, supply staff, volunteers, contractors, and proprietors.
- Follow the Home Office's and DfE's Prevent Duty Guidance.

The trust as an employer is responsible for the health and safety of its staff, pupils, and any visitors.

This includes a duty to manage asbestos effectively compliant with the 2012 Control of Asbestos Regulations.

The DfE expects academies to manage their school estate strategically and maintain their estate in good working condition.

The DfE's strong preference is for no trust employee to serve as a trustee or for trustees to occupy staff establishment roles on an unpaid voluntary basis, in order to retain clear lines of accountability. From 1 March 2022, any newly appointed senior executive leader can only be a trustee if the members decide to appoint them as such, if the senior executive leaders agree and if the trust's articles permit it.

The trustees must appoint an audit and risk committee (either a dedicated committee or combined with another committee) to advise on the adequacy of financial and other controls, to set up risk management arrangements, to direct a programme of internal scrutiny and to monitor the quality of external audits.

The Board of Trustees should carry out a skills audit (and MATs should address this for their LGBs) to ensure that it has the skills and experience necessary to carry out its duties efficiently, particularly at periods of transition. The DfE competency framework for governance is cited as a useful tool to help trusts identify skills gaps.

An objective external review of the effectiveness of the board should be conducted routinely as part of a wider programme of self-assessment and improvement.

Directions by the Education Secretary

Subject to the provisions in the academy trust's funding agreement, the Education Secretary can require the academy trust to remove a member or trustee. The Education Secretary can also make directions under section 128 of the Education and Skills Act 2008 prohibiting individuals from taking part in academy trust management. This could prevent an individual from acting as a member, trustee or executive leader of the trust.

The ESFA may also refer academy trusts to the Charity Commission if they are concerned about non-compliance with legal or regulatory requirements or misconduct or mismanagement in the administration of the academy trust. The Charity Commission may use its regulatory powers as described in its memorandum of understanding with the DfE.

The ESFA may refer academy trustees, as directors, to the insolvency service that may consider whether the conduct of a director is such that they are unfit to be involved in the management of a company and whether it would be in the public interest for a disqualification order to be sought.

Proper and Regular Use of Public Funds

The Trust must ensure that:

- Spending of funds has been for the purpose for which the funds were given.
- No trustee, governor, employee or related party has benefited personally from the use of Trust funds.
- All trustees have completed the register of business interests and there are measures in place to manage any conflicts of interest.
- There are no payments to any trustee unless such payment is permitted by the articles of association and, where applicable, comply with the terms of any relevant agreement entered with the Education Secretary.
- The senior officers' payroll arrangements fully meet their tax obligations and comply with the Treasury's directions regarding the employment and contract arrangements of individuals on the avoidance of tax.
- There is probity in the use of public funds.

- A competitive tendering policy is in place and applied.
- There is no disposal of publicly funded assets without the Education Secretary's consent, where such consent is required.

Management of Risk

The Trust must manage risks to ensure its effective operation and must maintain a risk register:

- Overall responsibility for risk management, including ultimate oversight of the risk register, must be retained by the Board of Trustees, drawing on advice provided to it by the audit and risk committee.
- Other committees may also input into the management of risk at the discretion of the board.
- Aside from any review by individual committees, the board itself must review the risk register at least annually.
- Risk management covers the full operations and activities of the Trust, not only financial risks.

The Board of Trustees has in place a policy for the management of risk which includes the requirement for the regular maintenance and review of a comprehensive risk register. The risk register contains details of designated individuals who oversee areas of risk. It is presented to the Audit Committee for discussion on an annual basis or more frequently if the Trust's activities change.

The Trust's risk management policy includes the requirement for a business continuity plan and contingency arrangements which would come into effect in the event of a disaster to ensure day-to-day operations are maintained.

The Trust's anti-fraud policy is reviewed on an annual basis and is in place to minimise the risk of fraud or theft within the Trust. In the event of a report of potential fraud, the provisions of the anti-fraud policy are invoked.

Risk management arrangements are monitored by the Audit Committee and reported to the Board of Trustees at least annually and more frequently if the Trust's activities change.

Board of Trustees

The Board of Trustees is responsible under the Trust's governing document for controlling its management and administration. It has responsibility for directing its affairs, and for ensuring that it is solvent, well-run, and delivering the charitable outcomes for the benefit of the public for which it has been set up.

The Board of Trustees has approved a written scheme of delegation of financial powers so that it is clear who is responsible for what. The scheme is reviewed annually and immediately when there has been a change in the Trust's management or organisational structure. The scheme of delegation is adhered to at all times.

No payments are made to any trustee by the Trust unless such payment(s) is/are permitted by the articles and, where applicable, comply with the terms of any relevant agreement entered into with the Education Secretary.

The Trust considers these obligations where payments are made to other business entities that employ the trustee, are owned by the trustee, or in which the trustee holds a controlling interest.

The Board of Trustees has responsibility for ensuring that the Trust's funds are used only in accordance with:

- The law.
- Their powers under the funding agreement and the articles of association which set out the powers of the Trust and its governance arrangements.

- The Academy Trust Handbook.

The Board of Trustees is responsible for the proper stewardship of the Trust's funds and for ensuring economy, efficiency and effectiveness in their use. It must also ensure that it uses its discretion reasonably and considers relevant guidance on accountability and propriety.

The members of the Board of Trustees are charity trustees and company directors.

The trustees should focus on the three core functions of governance:

- Ensuring clarity of vision, ethos and strategic direction.
- Holding Executive Leaders to account for the educational performance of the organisation and its pupils, and the performance management of staff.
- Overseeing and ensuring effective financial performance.

As charity trustees they are required to:

- Ensure compliance with legal obligations, the terms of the funding agreement and the Academy Trust Handbook.
- Safeguard the Trust's resources and assets, and ensure they are effectively managed.
- Report on the Trust's activities.
- Fulfil the charitable object of the charity as set out in the articles of association.
- Comply with the rules of the charity as set out in the articles of association.
- Ensure regularity, propriety and value for money.
- Act with integrity and avoid any personal conflicts of interest.
- Not to misuse charity funds or assets.
- Act prudently in the financial management of the charity, avoiding putting the assets, funds or reputation of the charity at risk.
- Exercise reasonable care and skill, using personal knowledge and experience to ensure the charity is well run and efficient.
- Act responsibly, obtaining advice from others, including professional advisers, where appropriate.
- Ensure regularity and propriety in the use of the Trust's funds and achieve economy, efficiency and effectiveness – the three key elements of value for money.

As company directors, they are required to:

- Act within their powers.
- Promote the success of the company.
- Exercise independent judgement.
- Exercise reasonable care, skill and diligence.
- Avoid conflicts of interest.
- Not accept benefits from third parties.
- Declare any interests in proposed transactions or arrangements.

The specific tasks of the Board of Trustees are to:

- Appoint a Principal for the Trust who will also hold the position of Accounting Officer.
- Appoint the Trust's Chief Financial Officer.
- Meet at least three times a year to discharge its responsibilities as defined in the Academy Trust Handbook and according to the Trust's Financial Procedures Manual.
- Approve the Trust's development plan and minute their approval.

- Approve the Trust's budget and minute their approval.
- Submit the budget to the ESFA in the form they require by the specified date.
- Notify the ESFA of significant changes to the budget.
- Comply with the ESFA's requirement to obtain its permission before entering into certain transactions.
- Manage the Trust's tax affairs in accordance with legislation and avoid any penalties.
- Ensure the financial health of the Trust and have in place:
 - Sound internal control procedures.
 - Risk management procedures.
 - Adequate insurance cover.
 - A business continuity plan.
 - Arrangements for reviewing and approving the Trust's establishment number, determining conditions of employment and levels of payment and progression for employees.
- Approve the Trust's written scheme of delegation.
- Approve the Trust's accounting policies.
- Maintain proper accounts.
- Prepare annual financial statements.
- Appoint a Registered Auditor, avoiding conflicts of interest.
- Ensure compliance with the Academy Trust Handbook, the funding agreement, the Trust's articles of association and other relevant legislation.
- Declare any pecuniary interests.
- Refuse benefits from third parties.
- Publish a governance statement within its annual financial statements.
- Carry out an annual review of the governance structure, including the range of skills available to the Board of Trustees.
- Ensure that financial plans are prepared and monitored, satisfying itself that the Trust remains a going concern and financially sustainable.
- Take a longer-term view of the Trust's financial plans consistent with the requirement to submit three-year budget forecasts to the ESFA.
- As part of its management of the Trust's funds, explain its policy for holding reserves in its annual report. Information on how the Trust must report on reserves is set out in the Academies Accounts Direction.

The trustees must apply the highest standards of conduct and ensure robust governance. The ESFA considers these critical for effective financial management. They should also follow the governance handbook which describes the following features of effective governance which the ESFA believes will aid compliance with the Academy Trust Handbook:

- Strategic leadership that sets and champions vision, ethos and strategy.
- Accountability that drives up educational standards and financial performance.
- People with the right skills, experience, qualities and capacity.
- Structures that reinforce clearly defined roles and responsibilities.
- Compliance with statutory and contractual requirements.

- Evaluation of governance to monitor and improve its quality and impact.

Frequency of Board Meetings

The Board of Trustees is aware that the ESFA recommends that medium-size and larger trusts, and any undergoing a period of change, consider more frequent board meetings than are required under their articles and complies with this requirement by including this as a standard agenda point at each of its meetings. The Board identifies the actions it needs to accomplish during the year, and this governs the frequency of meetings.

- The Board and its Committees meet regularly enough to discharge their responsibilities under the articles of association, funding agreement and the handbook, to ensure robust governance and effective financial management arrangements.
- Board meetings must take place at least three times a year and business must be conducted only when quorate.

If the Board meets less than six times a year it must describe in its governance statement, accompanying its annual accounts, how it maintained effective oversight of funds with fewer meetings.

Governance professional to the board and publication of minutes

The Trust has appointed a governance professional (formerly known as a clerk) to support the Board of Trustees who is someone other than a trustee, the principal or the chief executive of the trust. The governance professional helps the efficient functioning of the board by providing:

- Guidance to ensure the board works in compliance with the appropriate legal and regulatory framework and understands the potential consequences of non-compliance.
- Advice on procedural matters relating to operation of the board.
- Administrative and organisational support.

The Trust makes available for public inspection the agenda and approved minutes for every meeting of the trustees, LGBs and committees, along with any report, document or other paper considered at each meeting.

Resource Committee and Local Finance, Planning and Personnel (FP&P) Committee

The Board of Trustees has established a Resource Committee, which meets once a term, or more frequently if necessary. This Committee is responsible for monitoring and making recommendations to the Board of Trustees on matters related to finance. The Board of Trustees has:

- Defined its terms of reference;
- Prescribed the extent of its delegated authority;
- Ensured it receives minutes of the Committee's meetings.

The Board of Trustees reviews the Resource Committee's remit and membership annually.

Each Academy Trust has a Local FP&P Committee which mirrors the responsibilities of the Resource Committee at the local level and reports to the Local Governing Board.

Role of the Resource Committee/Local FP&P Committee in Relation to Finance

The Board of Trustees has adopted the pro forma terms of reference for a Finance Committee included in the Academy Trust Handbook.

Audit Committee

The Committee is therefore responsible for providing assurance to the Board of Trustees that risks are being adequately identified and managed by:

- Reviewing the risks to internal financial control for the Trust.

- Agreeing a programme of work to address, and provide assurance on, those risks.

Members do not include staff employed within the Trust. However, they may attend for the purposes of reporting and discussion. The Accounting Officer is routinely in attendance.

Role of the Executive Principal/CEO (Accounting Officer)

The Accounting Officer is personally responsible to Parliament, and to the Accounting Officer of the ESFA, for the resources under their control, and must be able to assure Parliament and the public of high standards of probity in the management of public funds.

The Trust's designated Accounting Officer is the Chief Executive Officer (CEO).

The essence of the role is:

- Assuring the Board of Trustees of compliance with the requirements of the Academy Trust Handbook and the funding agreement.
- Personal responsibility for the regularity, propriety and value for money in the use of the Trust's funds.
 - Regularity – dealing with all items of income and expenditure in accordance with legislation, the terms of the Trust's funding agreement and this handbook, and compliance with the Trust's internal procedures. This includes spending public money for the purposes intended by Parliament;
 - Propriety – the requirement that expenditure and receipts should be dealt with in accordance with Parliament's intentions and the principles of parliamentary control. This covers standards of conduct, behaviour and corporate governance;
 - Value for money (VFM) – this is about achieving the best possible educational and wider societal outcomes, within the Trust's objects, through the economic, efficient and effective use of resources, the avoidance of waste and extravagance, and prudent and economical administration. A key objective is to achieve VFM not only for the Trust but for taxpayers generally.
- Ensuring the maintenance and preparation of proper accounts.
- Ensuring that the Trust's property is under the control of the trustees and that fixed asset registers are maintained.
- Prudent and economical administration.
- The avoidance of waste and extravagance.
- The efficient and effective use of all the resources in their charge.
- Ensuring that procedures for the effective segregation of duties are in place.
- The day-to-day organisation, staffing and management of the Trust.

This role does not remove the responsibilities of the Board of Trustees as defined within the Academy Trust Handbook and in the Trust's Financial Procedures Manual.

The Accounting Officer completes and signs a statement each year demonstrating how the Trust has secured VFM.

The Accounting Officer also completes and signs a statement on regularity, propriety and compliance each year and submits this to ESFA with the audited accounts. This is sent to the ESFA and is published on the Trust's website.

The ESFA's accounting officer sends letters to all trust accounting officers, setting out their key responsibilities and highlighting any changes. The principal shares these letters with the trustees, finance and operations director and other members of the senior leadership team.

Whilst the Trust's Accounting Officer is accountable for the Trust's financial affairs, for keeping proper financial records, and for the management of opportunities and risks, the delivery of the Trust's detailed accounting processes will be delegated to the Finance and Operations Director, who will perform the role of Finance Director, Business Manager or equivalent.

The Accounting Officer advises the Board of Trustees in writing if, at any time, in his or her opinion, any action or policy under consideration by them is incompatible with the terms of the Academy Trust Handbook or funding agreement. Similarly, the Accounting Officer advises the Board of Trustees in writing if they appear to be failing to act where required to do so by the terms and conditions of the Academy Trust Handbook or funding agreement.

Where the Board of Trustees is minded to proceed, despite the advice of the Accounting Officer, the Accounting Officer must consider the reasons the Board of Trustees gives for its decision. If, after considering the reasons given by the Board of Trustees, the Accounting Officer still considers that the action proposed is in breach of the Academy Trust Handbook or funding agreement, the Accounting Officer must advise the ESFA's Accounting Officer of the position in writing.

When the senior executive leader (CEO) is planning to leave, the Board of Trustees should approach their Regional Schools Commissioner in advance to discuss their future plans.

Specific Financial Tasks Delegated to the Individual Academy Trust Principals

The Principal has delegated responsibility for:

- Leading and managing the Academy Trust development plan which is underpinned by sound resource planning, and identifies priorities and targets for ensuring that pupils achieve high standards and make progress, increase teachers' effectiveness and secure improvement of the Academy Trust's performance;
- Ensuring that the relevant ESFA financial regulations/standing orders or ESFA requirements are implemented;
- Establishing and maintaining sound internal financial controls which are managed on a daily basis by the Principal and Finance and Operations Director;
- Ensuring the effective implementation of current financial systems and procedures described in the Financial Procedures Manual;
- Ensuring that the funds delegated to the Academy Trust are in accordance with their legal entitlement;
- Ensuring the compilation of draft budgets for the Board of Trustees and appropriate Committees;
- Ensuring the efficient and effective deployment of the Academy Trust's resources;
- Ensuring the production of regular reconciled budget/financial reports to the Board of Trustees, ESFA and Companies House as appropriate.

The Role of the Finance and Operations Director (Chief Financial Officer)

The board must appoint a chief financial officer (CFO) to whom responsibility for the trust's detailed financial procedures is delegated. The CFO should play both a technical and leadership role. The CFO should be employed by the trust, and the trust must obtain prior ESFA approval if it is proposing, in exceptional circumstances, to appoint a CFO who will not be an employee. The CFO is an employee of the trust.

The CFO and their finance staff must be appropriately qualified and/or experienced. The MAT follows ESFA guidance and has appointed a qualified accountant as its Chief Financial Officer as it has over 3,000 pupils.

The Finance and Operations Director plays both a technical and leadership role, including ensuring sound and appropriate financial governance and risk management arrangements are in place, preparing and monitoring of budgets, and ensuring the delivery of annual accounts.

The Finance and Operations Director is responsible for the following financial duties:

- To fulfil the duties of the Chief Financial Officer according to the guidance in the Academy Trust Handbook. These are
 - The day to day management of financial issues;
 - The management of the Trust's financial position;

- The maintenance of effective systems of internal control;
- The preparation of the annual accounts for the Trust
- Providing financial advice to the Headteachers and Principals and Board of Trustees;
- The preparation and monitoring of the budget;
- Ensuring the maintenance of the Trust's accounting records;
- Income generation and recording;
- Reviewing and authorising monthly payroll information;
- Making purchases in accordance with VFM principles;
- Developing relationships with partners and exploring opportunities for obtaining support to the Trust;
- Promoting relationships with the local community and potential donors;
- Obtaining appropriate legal advice;
- Management and monitoring of specific projects, e.g. capital projects;
- Developing provision to promote 'best value';
- Developing and updating policies as required;
- Ensuring regular communication with the Responsible Officer and Auditors;
- Lead officer for the Resource Committee/Local FP&P Committee.

The CFO maintains continuing professional development and undertakes relevant ongoing training.

The Role of the Senior Finance Assistant

The Senior Finance Assistant is responsible for:

- Maintaining the Trust's accounting records;
- Liaising with Budget Holders and providing regular reports;
- Ensuring financial procedures are adhered to at all times;
- Preparation of monthly payroll information;
- Promoting VFM principles;
- Management of petty cash;
- Maintaining sample signature lists.

DISCLOSURE AND BARRING SERVICE CHECKS

The Trust ensures that enhanced disclosure and barring service certificates are obtained as appropriate for all staff and supply staff. This also applies to all academy trust members, trustees, LGBs and any individuals on committees.

WHISTLEBLOWING POLICY

Preamble

The Second Report of the Committee on Standards in Public Life: Local Public Spending Bodies published by The Nolan Committee used the term 'whistleblowing' to mean the confidential raising of problems or concerns within an organisation by a member of staff. This is not 'leaking' information but refers to matters of impropriety e.g. a breach of law, Trust procedures or ethics. Nor is whistleblowing the raising of a grievance within the Trust (which would be dealt with under the staff grievance procedures). The Trust has a Whistleblowing Policy that incorporates all aspects of whistle blowing. The Whistleblowing policy referred to in this document is relative to financial matters. The two policies do marry and are in line with the Scheme of Delegation.

Introduction

The staff and governors of the Trust seek to run all aspects of Trust business and activity with full regard for high standards of conduct and integrity. If members of Trust staff, parents, governors or the Trust's community at large become aware of activities which give cause for concern, the Trust has this Whistleblowing Policy; this acts as a framework to allow concerns to be raised confidentially and provides for a thorough and appropriate investigation of the matter to bring it to a satisfactory conclusion, under the Trust's disciplinary procedure.

The Trust is committed to tackling fraud and other forms of malpractice and treats these issues seriously. The Trust recognises that some concerns may be extremely sensitive and has therefore developed a system which allows for the confidential raising of concerns within the Trust environment but also has recourse to an external party outside the management structure of the Trust.

When Might the Whistleblowing Policy Apply?

Individuals are encouraged to come forward in good faith with genuine concerns knowing they will be taken seriously. A whistle blower should ask a few questions before taking action:

- Is it, or do you believe it to be, illegal?
- Is it, or do you believe it to be, against codes of practice issued by the Trust, the Local Authority, the DfE or a professional body?
- Does it contradict what the employee has been taught, or should have been taught?
- Is it about an individual's behaviour or is it about general working practices?
- Has the whistle blower witnessed the incident?

If any individual raises malicious unfounded concerns or attempts to make mischief, this will also be taken seriously and may constitute a disciplinary offence or require some other form of penalty appropriate to the circumstances.

All allegations should be capable of being dealt with through the disciplinary procedure and will be considered appropriately.

Where the alleged activity or behaviour cannot be dealt with under the scope of other procedures then consideration should be given to using this Whistleblowing Policy e.g.

- Manipulation of accounting records and finances;
- Inappropriate use of Trust assets or funds;
- Decision making for personal gain;
- Any criminal activity;
- Damage to the environment of the Trust;
- Dangerous practices;
- Abuse of position;
- Fraud and deceit or corrupt practices;
- Serious breaches of Trust procedures which may advantage a particular party (for example tampering with tender documentation, failure to register a personal interest);
- Other unethical conduct, including the circulation of inappropriate e-mails;
- Suppressing information about anything listed above.

Whistle blowers are encouraged to put their name to an allegation. If confidentiality is requested, the Board of Trustees will do its best to protect the identity of any member of staff who raises concerns. It will not disclose the identity of the whistle blower to the person who is the subject of the disclosure or to others not involved in the investigation unless it is absolutely necessary to do so and only with the prior consent of the individual concerned.

There are, however, circumstances under which complete confidentiality may be difficult for the governors to maintain. For example:

- If the matter leads to a legal procedure and evidence is required by the court.
- If the issue raised comes within the remit of another Trust procedure and the whistle blower is asked to provide a signed statement as part of the evidence, thus revealing their identity.

Anonymous allegations will only be considered if the issues raised are:

- Very serious;
- The credibility of the allegation is considered to be high;
- The likelihood of confirming the allegation is high.

Procedure

The Trust encourages the whistle blower to raise the matter internally in the first instance with their line manager (or the Principal, if the line manager is the one under suspicion; the Chair of Governors if the Principal or a governor is under suspicion; the Chief Executive, Responsible Officer and Academy Lead Officer from the DfE/ESFA if the Chair of Governors is under suspicion). This will allow them to right the wrong and give an explanation for the behaviour or activity. Alternatively, the whistle blower may request a private and confidential meeting in the first instance with the person who is causing concern. He/she may be accompanied by a representative of their choice if they so wish (e.g. Union representative or friend).

All matters will be treated in strict confidence and anonymity will be respected wherever possible. Written, dated and signed supporting evidence and statements should always be taken to any meetings if possible.

Alternatively, if the whistle blower considers the matter too serious or sensitive to raise within the internal environment of the Trust, the matter should be directed in the first instance to the Academy Lead Officer with the DfE/ESFA, although the DfE/ESFA will need to involve the appropriate governors.

The DfE/ESFA will have its own procedures for dealing with such matters and will ensure every effort to respect the confidentiality of the whistle blower. The DfE/ESFA will ensure relevant officers are informed as appropriate and should advise the Board of Trustees of appropriate steps to take.

How Will the Matter be Progressed?

The individual(s) in receipt of the information or allegation (Investigating Officer(s)) will carry out a preliminary investigation. This will seek to establish the facts of the matter and assess whether the concern has foundation and can or should be resolved internally. The initial assessment may identify the need to involve third parties to provide further information, advice or assistance, for example involvement of other members of Trust staff, the Trust's Internal Auditor and/or external Auditors, legal or personnel advisors, the police or the Department for Education.

Records will be kept of work undertaken and actions taken throughout the investigation. The Investigating Officer(s), possibly in conjunction with the Chair of Governors or nominee, will consider how best to report the findings and what corrective action needs to be considered. This may include some form of disciplinary action and/or third-party referral such as the police.

Depending on the nature of the concern or allegation and whether or not the Investigating Officer considers there to be a case to answer, the disciplinary procedure may be applied. In such cases any disciplinary action will be considered by the Dismissal Committee and if appropriate the Dismissal Appeals Committee of the Board of Trustees. Where a case is proven on the balance of probability the matter will be reported to the full Board of Trustees, the DfE/ESFA and, where appropriate the General Teaching Council.

If the whistle blower is dissatisfied with the conduct of the investigation or resolution of the matter or has genuine concerns that the matter has not been handled appropriately, the concerns may be raised with the Chair of Governors or, for financial impropriety, the Trust's Internal Auditor. If that fails to resolve matters, then the employee should seek the assistance of 'Public Concern at Work' on 0207 404 6609. For any concerns taken outside of the Trust this policy will not apply and any employee raising issues on a wider basis, e.g. with the press, without following the procedure in this policy may be liable to disciplinary action.

Respecting Confidentiality

Wherever possible the Trust seeks to respect the confidentiality and anonymity of the whistle blower and will as far as possible protect him/her from reprisals. The Trust will not tolerate any attempt to harass or victimise the whistle blower, or attempts to prevent concerns being raised, and will consider any necessary disciplinary or corrective action appropriate to the circumstances.

Conclusion

Existing good practice within the Trust in terms of its systems of internal control, both financial and non-financial, and the external regulatory environment in which the Trust operates, ensure that cases of suspected fraud or impropriety rarely occur. This Whistleblowing Policy is provided as a reference document to establish a framework within which issues can be raised confidentially internally and if necessary, outside the management structure of the Trust. This document is a public commitment that concerns are taken seriously and will be actioned. Any actions arising from allegations/investigation must be in accord with the Trust's disciplinary procedure, which should cover all of the potential areas of concern.

REGISTER OF BUSINESS INTERESTS POLICY

The members, trustees, governors and members of staff who can influence buying decisions recognise their responsibility to avoid any conflict between their business and personal interests and those of the Trust.

The Trust therefore maintains a register of the business interests of each Trust member, trustee, governor, member of staff with significant financial responsibilities, their relatives and other individuals who may exert influence. The register includes:

- Interests with suppliers from which the Trust may wish to buy goods or services;
- Interests in the appointment, salary, promotion or conditions of service of members of staff.

The information in the register is taken into account whenever buying or staffing decisions are made. Any trustee, governor or member of staff who has an interest in a business tendering for a contract does not form part of the Committee awarding the contract. Any governor or member of staff who has an interest in the appointment, salary, promotion or conditions of service of a member of staff does not form part of the Committee recommending or deciding these.

Members, trustees, governors and members of staff are required to inform the Trust of any changes in their interests as these arise so that they can be entered in the register. The register is also updated annually. Nil returns are obtained as appropriate. Any member, trustee, governor or member of staff who is unwilling to declare their interests or complete a nil return is not permitted to influence a buying or staffing decision.

The minutes of the full Board of Trustees, Resource Committee/Local FP&P Committee or any other Committee which can influence a buying decision will record a standard agenda point seeking updates to trustees and governors' business interests.

The only exception to the requirement to disclose a business interest is that if the interest is so distant or small that no ordinary right-thinking person would expect it to influence a person who might have dealings with the firm concerned. In such cases, it need not be disclosed. An example is a modest shareholding in a large public company even if the Trust has or may have dealings with the company.

The register is freely available for inspection by governors, staff and parents. The Trust is required to publish on their website the relevant business and pecuniary interests of trustees.

Receipt of Gifts, Hospitality, Entertainment and Other Services

The Trust does not accept any gifts, awards, prizes or any other benefit which might be seen to compromise its personal judgement or integrity. All members, trustees, governors and members of staff have been made aware of this.

Individuals involved in making buying decisions do not accept excessive, frequent or regular gifts, hospitality, entertainment or other services from existing or prospective suppliers. When considering whether to accept such offers, they consider whether they could affect their independence or cause concern that they might affect their independence. The Trust maintains a register of gifts and favours

offered and whether these were accepted or rejected. Members, trustees, governors and members of staff are required to inform the Trust of such offers as they arise.

If there is uncertainty over whether the acceptance of a gift or hospitality is appropriate, the matter is discussed with the Chief Financial Officer or Principal.

Expenditure on Gifts, Hospitality, Entertainment and Favour

The full Board of Trustees approves any expenditure on gifts, hospitality, ex-gratia payments and losses to be written off. The Trust maintains a log of these. Such expenditure is only authorised if the Board of Trustees can demonstrate that they have taken into account the principles of probity, accountability and value for money.

Expenditure on hospitality from public funds is only incurred in the provision of education. Hospitality is generally only provided in the workplace and usually restricted to tea/coffee, biscuits, soft drinks or sandwiches. No alcohol can be purchased for any reason using public funding. Modest hospitality is occasionally provided outside the workplace. The Principal maintains a register of the occasions when hospitality is provided, the number of people involved, and the costs incurred.

Private Use

The Trust does not obtain goods or services for the private use of governors and members of staff. They may not:

- Hold any interest in any equipment or property held or used for the Trust;
- Acquire any interest in the disposal of Trust equipment or property at the end of any contract between the Trust and any third party.

Related Parties

- The Board of Trustees ensures that the requirements for managing related party transactions are known to all relevant individuals and are applied in practice.
- The Chair of the Board of Trustees and the Accounting Officer ensure that their capacity to control and influence does not conflict with these requirements. They manage personal relationships with related parties to avoid both real and perceived conflicts of interest, promoting integrity and openness in accordance with the 'seven principles of public life'.
- The Trust recognises that some relationships with related parties may attract greater public scrutiny, such as:
 - Transactions with individuals in a position of control and influence, including the Chair of the Board of Trustees and Accounting Officer.
 - Payments to commercial organisations which have a profit motive, as opposed to those in the voluntary sector.
 - Relationships with external Auditors that go beyond their duty to deliver a statutory audit.
- The Trust maintains sufficient records, and makes sufficient disclosures in their annual accounts, to evidence that transactions with these parties, and all other related parties, have been conducted in accordance with the high standards of accountability and transparency required within the public sector.
- The Trust's register of interests captures relevant business and pecuniary interests of members, trustees, members of local governing bodies and senior employees, including:
 - Directorships, partnerships and employments with businesses.
 - Trusteeships and governorships, including at other educational institutions and charities.
 - For each interest: the name of the business, the nature of the business, the nature of the interest, and the date the interest began.
- The Trust identifies any relevant material interests from close family relationships between the Trust's members, trustees members of local governing bodies and senior employees. It also identifies relevant material interests arising from close family relationships between those

individuals and employees. Close family relationships are defined in the Academy Trust Handbook.

- Interests are not limited to the items above and the Trust considers whether other interests should be registered. If in doubt the presumption is towards including an interest in the register.
- The Board of Trustees keeps their register of interests up to date through regular review and trustees are required to declare any change in their interests at each board and committee meeting.
- The Trust publishes on its website relevant business and pecuniary interests of members, trustees and the Accounting Officer. The Trust has discretion over the publication of interests of other individuals named in the register.

Transactions with Related Parties

The Trust is even-handed in its relationships with related parties by ensuring that:

- Trustees understand and comply with their statutory duties as company directors to avoid conflicts of interest, not to accept benefits from third parties, and to declare interests in proposed transactions or arrangements.
- All members, trustees, members of local governing bodies and senior employees have completed the register of interests retained by the Trust, in accordance with the Academy Trust Handbook. There are measures in place to manage any conflicts of interest.
- No member, trustee, employee or related individual or organisation uses their connection to the Trust for personal gain, including payment under terms that are preferential to those that would be offered to an individual or organisation with no connection to the Trust.
- There are no payments to any trustee by the Trust unless such payments are permitted by the articles of association, or by express authority from the Charity Commission (which will be given only in exceptional circumstances) and comply with the terms of any relevant agreement entered with the Education Secretary. The Trust needs to consider these obligations where payments are made to other business entities that employ the trustee, are owned by the trustee, or in which the trustee holds a controlling interest.
- The Charity Commission's prior approval is obtained where the Trust believes a significant advantage exists in paying a trustee for acting as a trustee.
- Any payment provided to related parties satisfies the 'at cost' requirements in the Academy Trust Handbook which lists those persons considered to be related parties.

ESFA Prior Approval of Related Party Contracts

The Trust must report all transactions with related parties to the ESFA in advance of the transaction taking place, using their online form, for transactions made on or after 1 April 2019.

The Trust must obtain the ESFA's prior approval, using their online form, for contracts for the supply of goods or services to the Trust by a related party agreed on or after 1 September 2023 for contracts exceeding £40,000 in the same financial year ending 31 August.

For the purposes of reporting to, and approval by, the ESFA, transactions with related parties do not include salaries and other payments made by the Trust to a person under a contract of employment through the Trust's payroll.

At Cost Requirements

The Trust must pay no more than 'cost' for goods or services provided to it by the following persons:

- Members or trustees of the academy trust.
- Individuals or organisations related to a member or trustee of the academy trust, which include:
 - A relative of the member or trustee. This includes, but is not limited to, a child, parent, spouse or civil partner.

- An individual or organisation carrying on business in partnership with the member, trustee or a relative of the member or trustee.
- A company in which a member or the relative of a member (taken separately or together), and/or a trustee or the relative of a trustee (taken separately or together) holds more than 20% of the share capital or is entitled to exercise more than 20% of the voting power at any general meeting of the company.
- An organisation controlled by a member or the relative of a member (acting separately or together), and/or a trustee or the relative of a trustee (acting separately or together).
- Any individual or organisation given the right under the trust's articles of association to appoint a member or trustee of the academy trust, or anybody connected to such an individual or organisation.
- Any individual or organisation recognised by the Education Secretary as a sponsor of the academy trust or anybody connected to such an individual or organisation.

A body is connected to another individual or organisation if it is controlled by the individual or organisation, or controls the organisation, or is under common control with the individual or organisation. For these purposes, control means:

- Holding more than 20% of the share capital (or equivalent interest), or
- Having the equivalent right to control management decisions of the body, or
- Having the right to appoint or remove a majority of the board or governing body.

The at cost requirement applies to contracts with a related party agreed in any one financial year on or after 7 November 2013 that exceed £2,500 cumulatively.

- Where a contract takes the trust's cumulative annual total with the related party beyond £2,500, the element above £2,500 is paid at no more than 'cost'.
- The 'at cost' requirement applies to contracts for goods and services from a related party.
- In relation to organisations supplying legal advice or audit services to the trust, the 'at cost' requirement applies where the organisation's partner managing the service is a member or trustee of the trust, but not in other cases for those organisations. The published ethical standards for auditors prevent partners or employees of the audit firm from acting as a trustee of their client trust, but not of other trusts.
- The trust ensures that any agreement with an of the above individuals or organisations to supply goods and services is properly procured through an open and fair process and is supported by a statement of assurance to the trust confirming that charges do not exceed the full cost of the goods or services.

Transactions with Related Parties that are Novel, Contentious and/or Repercussive

The Trust seeks the ESFA's prior approval for transactions with related parties that are novel, contentious and/or repercussive.

- Novel payments or other transactions are those of which the Trust has no experience or are outside the range of normal business activity for the Trust.
- Contentious transactions are those which might give rise to criticism of the Trust by parliament and/or the public and/or the media.

- Repercussive transactions are those likely to cause pressure on other trusts to take a similar approach and therefore have wider financial implications.



TRUST: REGISTER OF BUSINESS OR PECUNIARY INTERESTS

Name of Member, Trustee, Governor or
Member of Staff: _____

Date of Appointment: _____

Date of Resignation/Retirement: _____

Name of Business	Nature of Business	Nature of Interest	Date of Appointment or Acquisition	Date of Cessation of Interest	Signature of Member, Trustee, Governor or Member of Staff

I certify that I have declared all beneficial interests which I or any person closely connected with me have with business or other organisations which may have dealings with the Trust. I have also declared all pecuniary interests.

Record of Review

Date of review	Reviewed by	Signature		Date of review	Reviewed by	Signature

Setting executive pay

The Board of Trustees ensures that its decisions about levels of executive pay (including salary and any other benefits) follows a robust evidence-based process and are a reasonable and defensible reflection of the individual's role and responsibilities. No individual is involved in deciding their remuneration. A basic presumption is that executive pay and benefits do not increase at a faster rate than that of teachers, in individual years and over the longer term. Inappropriate pay and benefits can be challenged by the ESFA, particularly in instances of poor financial management of a trust.

The Trust must publish on its website, in a separate readily accessible form, the number of employees whose benefits exceeded £100k, in £10k bandings, as an extract from the disclosure in its financial statements for the previous year ended 31 August. Benefits for this purpose include salary, other taxable benefits and termination payments, but not the Trust's own pension costs. In the case of employees who are trustees, their salary and other benefits will also be disclosed in £5k bandings in the Trust's financial statements, as set out in the model trustees' remuneration note in the academies accounts direction.

If the Trust has entered into an off-payroll arrangement with someone who is not an employee, the amount paid by the Trust for that person's work for the Trust must also be included in the website disclosure where the payment exceeds £100k, as if they were an employee.

INTERNAL SCRUTINY

The audit and risk committee must:

- Direct the Trust's programme of internal scrutiny.
- Ensure that risks are being addressed appropriately through internal scrutiny.
- Report to the board on the adequacy of the Trust's internal control framework, including financial and non-financial controls and management of risks.

The Trust is required to implement robust systems of internal control and a system of checking financial controls. Internal scrutiny cannot be carried out by a member of the senior leadership team.

The control framework includes:

- Ensuring delegated financial authorities are complied with.
- Maintaining appropriate segregation of duties. It is recognised that this may be difficult in small schools where additional checking is carried out if considered appropriate.
- Co-ordinating the planning and budgeting process.
- Applying discipline in financial management, including managing debtors, creditors, cash flow and monthly bank reconciliations.
- Planning and oversight of any capital projects.
- Management and oversight of assets.
- Regularity and propriety and value for money in the organisation's activities.
- Reducing the risk of fraud and theft.
 - Independent checking of financial controls, systems, transactions and risks. The Trust has appointed an independent company to carry out these checks.
 - The programme of checks carried out is agreed with the Board of Trustees annually. After each checking session, the company provides the Board of Trustees with a written report explaining any material control issues and remedial action required.

The Trust's programme of internal scrutiny provides independent assurance to the board that its financial and other controls and risk management procedures are operating effectively.

Internal scrutiny is delivered by using a bought-in internal audit service. It is covered by a scheme of work, driven and agreed by the audit committee (which is combined with the resource committee) and informed by risk. The Trust identifies on a risk basis (with reference to its risk register) the areas it will review each year, modifying its checks accordingly. This involves greater scrutiny where procedures or systems have changed. The programme of work is carried on throughout the year and includes regular updates to the audit committee. The audit committee reports to the board on the adequacy of the Trust's financial and other controls and management of risk

Internal scrutiny focuses on:

- Evaluating the suitability of and level of compliance with financial and other controls.
- Offering advice and insight to the board on how to address weaknesses in financial and other controls.
- Ensuring all categories of risk are being adequately identified, reported and managed.

The Trust submits an annual summary report of the areas reviewed, key findings, recommendations and conclusions to the ESFA by 31 December each year, when it submits its audited annual accounts.

AUDIT

Audit and Risk Committee reviews

Specifically, the audit and risk committee must:

- Review the external auditor's plan each year. This is achieved by the Finance and Operations Director circulating the plan being considered by the Finance Committee for the year, to the Audit and Risk Committee and Internal Auditor for noting.
- Review the annual report and accounts.
- Review the auditor's findings and actions taken by the Trust's managers in response to those findings.
- Assess the effectiveness and resources of the external auditor to provide a basis for decisions by the Trust's members about the auditor's reappointment or dismissal or retendering. Considerations may include:
 - The auditor's sector expertise.
 - Their understanding of the Trust and its activities.
 - Whether the audit process allows issues to be raised on a timely basis at the appropriate level.
 - The quality of auditor comments and recommendations in relation to key areas.
 - The personal authority, knowledge and integrity of the audit partners and their staff to interact effectively with, and robustly challenge, the Trust's managers.
 - The auditor's use of technology.
- Produce a report of the committee's conclusions to advise the members, including recommendations on the reappointment or dismissal or retendering of the external auditor, and their remuneration.
- The appointment of external auditors is carried out annually and the renewal of engagement is at the discretion of the Board of Trustees. Formal reassessment is carried out every five years through a process of competitive tendering.

Public Funds

The Trust adheres to the external audit regime as outlined in the Academy Trust Handbook and as required by Companies House.

The appointment of external Auditors is carried out annually and the renewal of engagement is at the discretion of the Board of Trustees. Formal reassessment is to be carried out every three years through a process of competitive tendering.

The Trust has appointed statutory Auditors, who are registered under the requirements of the Companies Act, to carry out an audit and certify that the accounts are 'true and fair'. The Auditors are engaged to carry out a 'true and fair' audit and a regularity audit.

The engagement letter complies with the requirements of the ESFA for regularity auditing. Additional services are not supplied but, should they be, these will be subject to a separate letter of engagement.

The letter of engagement:

- Provides for the removal of the Auditors before the expiry of their term of office in exceptional circumstances. Proposals to remove the Auditors require a majority vote of the members of the Board of Trustees.
- Requires the Auditors to state their reasons if they resign from office.

The Board of Trustees must notify the ESFA immediately of the removal or resignation of the Auditors:

- In the case of removal, the Board of Trustees must notify the ESFA of the reasons for the removal.
- In the case of resignation, the Auditors must copy to the ESFA a statement of their reasons.

The Accounting Officer's statement on governance, regularity, propriety and compliance is included in the Trust's annual report. A review of this statement is included within the external Auditors' remit and their opinion on this is addressed jointly to the Trust and the ESFA.

The report from the annual external audit, and the associated action plan, is received by both the Trust Resource/Local FP&P Committee and Audit Committee and reported to the Board of Trustees. The Board ensures that there is an appropriate, reasonable and timely response to any audit findings, taking the opportunity to strengthen the Trust's systems of financial management and control.

The Accounting Officer has a responsibility to advise the Board of Trustees and the ESFA of any instances of irregularity or impropriety, or non-compliance with the terms of the Trust's funding agreement.

The Trust publishes their annual accounts on their website in accordance with the deadline set out in the Academy Trust Handbook.

The Trust manages this programme of risk review and checking of financial controls by appointing a Responsible Officer. Whilst the appointment of a Responsible Officer is not mandatory it is the option the Board of Trustees uses to conduct their internal checks.

The programme of checks carried out is agreed with the Board of Trustees. After each visit the Responsible Officer provides the Board of Trustees with a written report.

INSURANCE

Funds for insurance are delegated to the Trust and it must demonstrate it can cover insurable interests under a policy arranged by the Board of Trustees.

The Resource Committee reviews insurance arrangements annually. They ensure that the sums insured are commensurate with risks and include cover for Trust property when off the premises.

The main types of insurance cover which are in place are:

- Premises and contents. These should be insured at replacement cost against damage by subsidence, fire, lightning, explosion, storm, flood, riot, malicious damage, terrorism and similar risks;
- Business interruption;

- Board of Trustees and employer liability. The currently recommended minimum level of cover for Trusts is £10m for each;
- Any statutory motor transport insurance;
- Loss of assets through fraud or dishonesty on the part of employees;
- Personal accident; and
- Fidelity insurance.

Details of all insurance policies held by the Trust are kept in the office of the Trust Facilities Manager.

The insurers are notified of all new risks, property and equipment and vehicles which require insurance or any other alteration affecting existing insurance on a timely basis.

The Trust does not give any indemnity to a third party without the written consent of their insurers.

The Trust immediately informs its insurers of all accidents, losses and other incidents, which may give rise to an insurance claim.

Claims under an insurance policy are authorised by the Trust Facilities Manager prior to submission to the insurance company.

Any member of staff using their car for Trust purposes amends their personal insurance for this. The Trust maintains a register of official users. This is signed by the users to acknowledge that the insurance cover provision has been made.

TAXATION

The Trust abides by the procedures issued by HMRC (Her Majesty's Revenue & Customs) in connection with VAT.

The Trust ensures that all employees' payroll arrangements fully meet their tax obligations and comply with HM Treasury's guidance on this matter regarding the employment and contract arrangements of individuals on the avoidance of tax, as set out in the Treasury's Review of the Tax Arrangements of Public Sector Appointees.

The Trust keeps potential 'trading' activities under review and considers whether to set up a subsidiary trading company.

The Trust is aware that Electric Vehicle (EV) salary sacrifice schemes do not need ESFA approval where no liability falls on the Trust if an employee does not fulfil their contractual obligations with the scheme provider. For other types of EV salary sacrifice schemes, prior ESFA approval must be obtained.

TRUST IMPROVEMENT PLAN AND BUDGETING

Budgeting

The board takes an integrated approach to curriculum and financial planning so that they are confident about planning the best curriculum for their pupils and delivering the Trust's educational priorities with the funding they have available.

The Board of Trustees challenges pupil number estimates because these underpin revenue projections, and reviews these termly.

The Board of Trustees has a long-term strategic Trust improvement plan, which explains how it intends to use its resources to achieve its aims and objectives. The plan is costed for three years.

This takes account of:

- The educational priorities for the Trust;
- Likely demographic changes affecting pupils and staff;
- The building and repair maintenance programme;
- Repair and renewal programmes for furniture, fittings and equipment.

The plan is an integral part of the Trust's self-evaluation cycle and it is reviewed on an annual basis and updated in the light of new information and changed priorities.

The plan is constructed using the following processes:

- An estimation of income, based on the Trust census, plus estimates for Education Services Grant (ESG) allocations, lettings and community income and any other income;
- An estimation of staffing costs, based on a staff salary calculator taking account of known retirements, responsibility allowances, etc;
- An estimation of operational expenditure, based on known cost trends for utilities, supplies, service level agreements, etc;
- The identification of potential efficiency savings;
- The allocation of curriculum budgets to departments, using a transparent formula to allocate funds equitably in line with need and Trust priorities;
- An annual review of the Trust's self-evaluation priorities, which forms part of the Ofsted inspection requirements;
- The identification of ICT developments on the basis of priorities detailed in the ICT development plan;
- The identification of premises developments on the basis of priorities detailed in the premise's development plan;
- Planning the use of allocations from the ESG;
- Verifying planned levels of unspent balances – ensuring the resulting annual surplus or deficit is in line with plans to recover from an overall deficit position or build up unspent balances to fund future development plans.

The annual budget is derived from the Trust development plan. The budgeting process starts at the beginning of the spring term each year. The Finance and Operations Director draws up a draft budget for the following financial year by June and this is submitted to the Resource Committee for their review, discussion and amendment if appropriate. The budget is then submitted to the full Local Governing Board for formal review and approval, before sending to the Trust for final approval. Once final approval is obtained the budget is submitted to the DfE/ESFA by the end of August.

- The Board of Trustees may not set a deficit budget. If an unplanned deficit occurs during the financial year, the Trust notifies the DfE/ESFA as soon as it is aware of this.
- The Board of Trustees must notify the ESFA within 14 days if it is formally proposing to set a deficit revenue budget for the current financial year, which it is unable to address after funds from previous years are taken into account.

The Trust submits the final agreed budget, together with the assumptions underpinning the budget, to the DfE/ESFA by the specified deadline.

The budget can only be amended for virements after it has been approved by the Board of Trustees and sent to the DfE/ESFA. Budget Holders cannot exceed their budget allocation, unless they have the written approval of the Chief Executive.

The Resource Committee formally monitors the implementation of the Trust's budget on behalf of the Board of Trustees.

REPORTING FINANCIAL RESULTS

The Trust prepares accounts in the various formats required as specified in the Academy Trust Handbook.

Annual Accounting

The Trust's financial year runs from 1 September to 31 August and is consistent with the academic year.

Annual financial statements are prepared in accordance with the statement of recommended practice (SORP), the requirements of the Companies Act and with the provisions of the academy's accounts direction produced by the ESFA.

The Trust's accounting policies have been approved by the Board of Trustees.

Budget Monitoring Reports

The Trust's budget monitoring reports display, as a minimum, the following information in columnar format:

- The annual budget (approved by Governors);
- The actual spend to date;
- Commitments;
- End-of-year projections.

The Finance Office carries out monthly reviews of actual performance against budget and produces a schedule explaining virements and variances. They also produce a monthly balance sheet.

The management accounts are shared with the Chair of the Resource Committee/Local FP&P Committee and Chief Executive/Accounting Officer every month and with other Trustees six times a year.

Budget Holders receive monthly reports showing budgeted expenditure, actual expenditure on an accruals basis and commitments.

The finance and operations director produce management accounts every month setting out the Trust's financial performance and position, including an income and expenditure account, variation to budget report, cash flows and a balance sheet. The Trust has selected key financial performance indicators and measures performance against them regularly, including analysis in its annual trustees' report.

CAPITAL PROJECTS

In circumstances where capital projects are undertaken by the Trust, the Board of Trustees will give consideration as to how these can be best managed within the resources available. Separate project budget monitoring and reporting will be carried out in relation to designated capital projects.

The Board of Trustees ensures they are aware of and are applying the following guidance relevant to estates safety and management:

- Advice, standards and tools for academy trusts at Good Estate Management for Schools, including guidance on an estates strategy and asset management plan, and the Estate management competency framework for standards on the skills and knowledge needed for individuals at all levels.
- The Condition Data Collection (CDC) process which helps DfE understand the condition of government funded schools across England for the purposes of targeting funding where it is needed most.
- Reinforced Autoclaved Aerated Concrete (RAAC) guidance. RAAC is a weaker form of concrete used in floors, walls, and roofs of buildings constructed or modified between the 1950s and mid-1990s and could pose a particular risk.
- School Capital Funding guidance, who it's for, current and past allocations, how it's calculated and spending guidance.
- Condition Improvement Fund including links to terms and conditions.

Further information and guidance are available from The Trust Network, which is run by trusts for trusts to help its members develop effective, efficient, and economically sustainable estates and safety management.

CASH FLOW

The Finance and Operations Director is responsible for preparing cash flow forecasts to ensure that the Trust has sufficient funds available to pay for day-to-day operations. If significant balances can be foreseen, steps are taken to invest the extra funds. Similarly plans are made to transfer funds from another bank account or to re-profile General Annual Grant to cover potential cash shortages.

COMPUTERISED ACCOUNTING SYSTEM

The Finance and Operations Director has prepared a disaster recovery plan in the event of loss of accounting facilities or financial data. This links in with the annual assessment made by governors of the major risks to which the Trust is exposed and the systems that have been put in place to mitigate those risks.

The Trust's accounting system is computerised. Access to the system is restricted to the Trust's employees and those authorised by the Accounting Officer. The system is accessed by passwords, which are changed routinely on a monthly basis. Passwords are only known by the relevant member of staff and the System Manager. Passwords are changed immediately if an employee is aware that an unauthorised person has learnt their password. If an outside provider uses the computerised accounting system, they are given their own user id and password.

Software is installed on the Trust's computer systems to detect viruses, spyware, and other malicious threats. Regular updates are used to ensure that the latest threats are detected. There is also a facility for cleaning up infected files.

Three-monthly reviews are carried out to ensure that access rights and levels of access are still relevant to the responsibilities of individual users. Access for Staff who are no longer employed by the Trust is removed as soon as the member of staff leaves.

The Trust complies with the requirements of the GDPR.

Alterations to any original documents such as cheques, invoices, orders and other vouchers are made clearly in ink and initialled. The use of correcting fluid or the erasure of information is not acceptable.

All accounting records including invoices, delivery notes, bank statements etc are retained in hard copy for six years, plus the current year, in a secure area.

The CFO is responsible for the secure retention of all financial documents for the period required by the Companies Act and charity legislation. These documents may be requested by authorised external agencies at any time, for example the Trust's auditors or the ESFA. The CFO makes arrangements with the IT manager for the secure retention of electronic accounting records in accordance with the Trust's internal data security policy and management and retention of records policy.

Transaction Processing

All transactions input to the accounting system must be authorised in accordance with the procedures specified in this manual.

The Finance and Operations Director will obtain and review system reports to ensure that only regular transactions are posted to the accounting system. The report obtained and reviewed will include:

- Weekly audit trails;
- Masterfile amendment reports for the payroll, purchase ledger and sales ledger;
- Management accounts summarising expenditure and income against budget at Budget Holder level.

Reconciliations

The Finance and Operations Director is responsible for ensuring that the following reconciliations are performed each month, and that any reconciling or balancing amounts are cleared:

- Sales ledger control account;
- Purchase ledger control account;
- Payroll control account;
- All suspense accounts; and
- Bank balance per the nominal ledger to the bank statement.

The Finance and Operations Director will sign all reconciliations as evidence of review.

AUTHORISED SIGNATORIES LIST

An authorised signatory list, including specimen signatures and covering all the key financial systems, is held in the Finance Office for reference purposes.

PAYROLL

The Board of Trustees formally approves all appointments, terminations and salary levels. They have established procedures to:

- Ensure personnel are competent, suitably qualified and trained to a level consistent with their responsibilities;
- Provide clear statements of criteria for personnel selection;
- Provide formal job descriptions;
- Ensure that the cost of all appointments, re-gradings and any other changes in conditions of service of staff can be met within the resources available to the Trust.

All appointments are confirmed by letter and further details are included in the employee's contract of employment and statement of particulars. The human resources manager carries out the specified pre-employment checks.

The Chief Financial Manager maintains a list of staff employed by the Trust and their current salaries, which has been authorised by the Board of Trustees.

The Trust uses the services of a payroll agent and the contract between the Trust and the agent includes:

- Responsibility for making returns to HMRC and the dates by which these returns should be made;
- Details of ownership of programs and data files;
- Responsibilities for the control and accuracy of data;
- Details of authorised signatories for payroll amendments;
- Back up provisions;
- A schedule of reports to be sent to the Trust for financial and personnel monitoring purposes;
- An agreement as to the response time and costs that will be charged for any additional data or reports required by the Trust; and
- Provision for access for Trust Staff and Auditors.

The payroll agent processes the staff payroll only on the written instructions of the Finance and Operations Director. They do not process salary changes authorised by the person whose salary is changing. The Trust notifies any changes to the Chief Executive's salary to the payroll agent.

Payments are made as follows:

- Net payments to staff, by BACS, by the payroll agent;
- HMRC payments, by the payroll agent, to HMRC;
- Pension payments, arranged through the payroll agent;
- Overtime claims, as part of net payments to staff, through the payroll;

Access to personnel files is restricted to the Principal, Finance and Operations Director, and selected members of the HR and finance staff.

No individual is treated as 'self-employed' without the clearance of HMRC.

Additional Payments

Any additional payments to staff, for example overtime, must be approved by the Chief Financial Officer in advance and the agreed rate of payment should be confirmed in writing. All such payments should be claimed on an official claim form which must be completed in full, including the reason for the claim, and signed and dated by the claimant. The claim should be approved by the relevant Budget Holder and payment is made through the monthly payroll.

Payment of Expenses

The Trust has an expenses policy which is reviewed by the Board of Trustees on an annual basis. The policy provides guidance about expenses which can be reimbursed to members, trustees, directors, governors and members of staff.

Monthly Procedures

- The HR function completes standing data amendment forms and summarises overtime worked;
- The HR function ensures that overtime have been validly incurred and appropriately authorised. Claims are not returned to claimants after this check has been carried out;
- The Finance and Operations Director ensures these checks have been carried out and authorises the information to be sent to the payroll agent;
- The HR Lead checks the payroll printout received from the payroll agent to ensure that it is only paying its own staff at the correct rates;
- The Finance and Operations Director authorises the payroll agent in writing to make the salary payments;
- A monthly print-out of amounts paid to employees is retained by the Trust and initialled by the Senior Finance Assistant and Finance and Operations Director as evidence of the checking and authorisation procedure;
- The HR Lead and the Senior Finance Assistant check gross pay as per the payroll to personnel records annually.

Failure to the Payroll System

Monthly salary payments are transmitted via the payroll agent. The transmission to bank takes place at least three working days before the payment date. Therefore, the Trust should be aware of any difficulties at least three working days in advance, thus minimising risk.

The Trust's bank has been consulted regarding a possible failure to the payroll system or the usual method of transmission. In the event that pay details could not be transmitted to the bank via the usual system, the payroll database would be emailed directly to the bank and the content checked via telephone. The bank would arrange payments directly.

In the event of total IT failure at the Trust, payments would be discussed directly by telephone with the payroll agent.

PURCHASING

The Board of Trustees makes its buying decisions in accordance with the principles of value for money, probity and accountability. Contracts are placed on a competitive basis and the reasons for selecting a supplier are minuted. Divisible contracts are prohibited.

The Health and Safety competence of contractors is assessed, taking into account the policies and procedures of the DfE/ESFA.

Approved Suppliers

The Finance Office maintains a database of approved regular suppliers.

The Finance Office selects suppliers on the basis of their capacity to provide quality, quantity, service, timely delivery and price competitiveness. Volume discounts and credit terms are taken into account. Consortia are used where they provide value for money.

Suppliers are selected from:

- Business directories;
- Trade journals;
- Supplier catalogues and mail shots;
- Information from other Academy Trusts;
- Information provided by the DfE/ESFA.

The listing of approved suppliers is reviewed and approved on an ongoing basis by the Finance and Operations Director and on an annual basis by the Resource Committee/Local FP&P Committee.

Tendering

All purchases with a value of £75,000 or more are put out to formal tender. Where appropriate, the suppliers invited to tender are drawn from the approved list maintained by the Finance Office.

Where required by the conditions attached to a specific grant from the DfE/ESFA, the department's approval must be obtained before the acceptance of a tender.

Where there is a need regarding a Safeguarding or Health and Safety issue, the Trust Board recognises that a formal tender process may not be practical because of the time this would take. As the education and safety of the students is paramount, the following process is followed:

- The Headteacher or Principal of the relevant academy informs the Finance and Operations Director of the need in writing.
- The Finance and Operations Director sources a solution using a trusted supplier and confirms that the price is within the range expected.
- The Chair of the Trust (or the Chair of the Trust Resource Committee if the Chair of the Trust is not available) authorises the purchase having confirmed that this procedure has been followed.
- The emergency purchase and the procedures followed are reported to the full Trust Board at their next meeting.

The following tendering procedures are followed:

- The Budget Holder prepares a specification, which is authorised by the Principal and sent to at least four suppliers;
- The invitations to tender include:
 - An introduction/background to the project;
 - The scope and objectives of the project;
 - Any technical requirements;
 - Implementation details for the project;
 - The terms and conditions of the tender;
 - The form and date of response to the Trust.

The use of brand names is avoided and, where appropriate, a European or British Standard or other quality guideline is sought. Reference is made to appropriate safety standards and fire and health and safety regulations.

- All replies are addressed to the Finance and Operations Director in a plain sealed envelope marked 'Tender';
- No supplier is allowed to amend their tender after the fixed date for receipt;
- All tenders are opened at the same time by the Finance and Operations Director and a member of the Trust Resource Committee. Two persons should be present for the opening of tenders as follows:
 - For contracts up to £25,000 – two of the Budget Holder, the Finance and Operations Director or Principal;
 - For contracts over £25,000 – the Finance and Operations Director or the Principal plus a member of the Resource Committee/Local FP&P Committee.
- The following information is recorded:
 - The date and time of opening;
 - The names and signatures of those present;

- The value of each tender;
- Details of suppliers who declined the invitation, or failed to submit a tender;
- Any omissions in the submission, e.g. documents, signatures, missing data;
- Late tenders are rejected and retained unopened until the contract is awarded. They are then returned to the tenderer with an explanatory note;
- Where contracts under seal provide for payments to be made in instalments, the Accounting Officer ensures a contract register is maintained which shows the state of the account on each contract together with related professional fees and other payments;
- The Resource Committee/Local FP&P Committee make recommendations as to which tender to accept. The decision as to which tender to accept is made by the full Board of Trustees;
- The reasons for accepting a particular tender are in accordance with the Trust's best value policy;
- The following points are considered when deciding which tender to accept:
 - Suppliers;
 - Qualifications, technical ability and experience;
 - Pre-sales demonstrations;
 - After sales service;
 - Quality procedures;
 - References from existing customers;
 - Financial status;
 - Professional indemnity insurance;
 - Cost;
 - Overall price;
 - Unit price for parts of the product or service;
 - The possibility of 'hidden costs';
 - Scope for negotiation.

Quotations

Quotations are obtained as follows:

- Purchases up to £5,000 – catalogue price lists.
- Purchases of £5,000 to £74,999 – three written quotations.

The Trust keeps a record of suppliers who have been contacted but who have declined to provide a quotation.

Credit Card

The objectives of the credit card are:

- To allow Trust personnel access to efficient and alternative means of payment for approved expenses, especially expenses related to business travel and Trust supplies.
- To improve managerial reporting related to purchasing/charge card purchases.
- To improve efficiency and reduce costs of payables processing.
- To reduce the need for petty cash.

The policy:

- The operation and control of the Trust's purchasing cards, credit and debit cards are the responsibility of the Senior Finance Assistant. There will be appropriate oversight of the distribution of such cards and associated card limits.
- Holders of cards must use them only for the purposes for which they have been issued and within authorised purchase limits.

- Such cards shall be used for the payment of valid business expenses only, and the misuse of such cards shall be grounds for disciplinary action.
- Cards must not be loaned to another person, nor should they be used for personal or private purchases.
- Cardholders should obtain approval to purchase from the relevant Budget Holder and should ensure that there is sufficient budget available to meet the costs.
- The following purchases are expressly prohibited:
 - Controlled substances;
 - Items or services on term contracts;
 - Personal items or loans;
 - Any other items deemed inconsistent with the values of the Trust.
- Cash advances on purchasing/charge cards are not allowed under any circumstances. This includes the use of any form of cash withdrawal or cash back facility.

The procedures:

- Credit cards may be requested for prospective cardholders by written request (purchasing/debit card request form) to the Senior Finance Assistant in the first instance. The decision to issue a card will be made in consultation with the Principal.
- An individual Card Transaction Log must be completed on a monthly basis for each purchase and signed by the user and a purchase order duly signed by the Budget Holder prior to any purchases.
- Detailed VAT receipts must be retained and attached to the transaction log. In the case of meals and entertainment, each receipt must include the names of all persons involved in the purchase, and a brief description of the business purpose of the purchase.
- Monthly bank statements must be submitted to the Finance Office immediately on receipt of the statement to enable timely reconciliation and payment of amounts due.
- All Trust purchasing/debit cards shall be paid by direct debit monthly in full by the Trust so as not to incur interest charges.
- All card holders are responsible for promptly forwarding relevant paperwork associated with any transactions made through their accounts to the Finance Office who will check them against the monthly bank statement and enter the details into the Trust's financial system.
- All purchasing/debit cards, with the exception of that issued to the Principal, will be held in the school safe and will be issued to card holders at their request as and when needed. The purchasing/charge card will be signed in and out and a record kept within the Finance Office.

Purchase Orders

Computerised, pre-numbered orders are used for all goods and services and all orders are placed through the Finance Office or in the case of IT equipment and software through the IT department.

Orders are only made by telephone in exceptional circumstances and then confirmed in writing. A copy of any spoiled order is retained on the computer and marked as such. Official Trust orders are not generated for the private use of individuals.

The Ordering Process

- The Budget Holder raises and signs a requisition form stating the number of items and price of the order to be raised;
- The Budget Holder sends the requisition to the Senior Finance Assistant who checks that the Budget Holder has sufficient funds for the purchase;
- The Finance Office generates an official computer order;
- The Senior Finance Assistant signs the official order;
- The Finance Office distributes the copy orders as follows:

- Top copy (official order) to the supplier;
- The second copy is retained in the Finance Office;
- The computer records all orders placed that have not yet been invoiced.
- Cancelled orders are marked as such, with the reason for cancellation, and retained in the Finance Office.

The Senior Finance Assistant is able to sign official orders up to £500 (ex VAT). Orders over £500 must be authorised by the Finance and Operations Director.

Receipt of Goods

- All goods received are delivered to the Budget Holder who carries out a prima facie check to ensure that the delivery is complete;
- If the delivery is only partly fulfilling an order, the Budget Holder notifies the Finance Office which maintains a record of this;
- The Budget Holder and/or Finance Office follows up any shortages or defective items with the supplier.

Purchase Invoices

- The Finance Office records invoices on the computer as soon as they are received by the Trust;
- The Finance Office grid stamps the invoice and passes it to the Budget Holder for approval;
- The Finance Office checks the invoice against the order and authorised signatory list

Payment of Invoices

The Finance Office reviews the creditors' ledger regularly and selects invoices for payment.

It is the policy of the Trust to pay all invoices by the due date and to take advantage of any discounts available for early settlement where this is to the Trust's advantage.

Invoices are paid within the suppliers' credit terms unless they are disputed.

Payment is made when the Finance Office has made the following checks:

- The purchase is recorded on the purchase ledger;
- The purchase represents valid Trust expenditure;
- Goods or services were ordered using the Trust's ordering policy;
- Goods or services have been received and checked to the order and delivery note;
- Payment has not already been made;
- Prices agree with quotations, tenders, contracts or catalogue prices;
- The arithmetic on the invoice is correct;
- The invoice has been correctly coded;
- Discounts have been taken where applicable;
- VAT is properly accounted for and not claimed on pro-forma invoices.

The Finance Office completes the relevant sections of the grid stamp. The Senior Finance Assistant authorises payment, having ensured that the Budget Holder has signed the order and that all of the Trust's procedures have been followed.

The Trust's funds must not be used to purchase alcohol for consumption, except where it is to be used in religious services.

Cheque Payment

All supporting documentation is passed to the cheque signatories together with the cheque for signing. The cheque signatories initial the invoices they have seen as a record to show that they were signing

for valid Trust expenditure and that the relevant pre-checking process had been carried out by the Finance Office.

BACs and Same Day Payments

The Trust pays most suppliers by electronic transfer. In this instance once person is required to authorise the payment, noting that the correct internal controls have been adhered to by the Senior Finance Assistant.

Credit Notes

Credit notes should be cross-referenced to the original invoice. Where a credit note is a contra credit for an invoice that has not been paid the Senior Finance Assistant may sign in place of the Budget Holder.

Completeness of Supplier Balances

Invoices and credit notes are posted to the computer as soon as the Trust receives them.

The Finance Office reconciles individual supplier balances to supplier statements, where available, on a monthly basis.

Controls over Expenditure

Individual Budget Holders are able to authorise for goods and services up to £1,000 (for individual items) and within their budget. Authorisations over this amount must be referred to the Assistant Principal or Principal who can authorise expenditure up to £5,000 (for individual items). Authorisations over £5,000 must be referred to the Principal or Finance and Operations Director who can authorise expenditure of up to £10,000 (for individual items) provided they have already been budgeted for. Over this, authorisation must be sought from the Chief Executive. Authorisation of expenditure above £30,000 must be sanctioned by the Resource Committee.

For the following categories of expenditure:

- Examination fees
- Utility bills
- Catering fees
- School trips

The Finance and Operations Director can authorise expenditure provided that the cost is within the budget approved by the Trust Board and the Trust's purchasing procedures to ensure best value have been followed.

These limits are exclusive of VAT.

Virements

Virements (internal transfers between capital and revenue budgets) of up to £10,000, whichever is the smaller within the agreed budget, may be authorised by the Chief Executive and these must be reported to the Resource Committee. For virements over £10,000 and up to £30,000, consultation is required with the Chief Executive and agreement must be obtained from the Resource Committee who may authorise any virement of funds from the contingency. If the necessary virement exceeds £30,000 then the full Board of Trustees is required to authorise the virement.

Budget Holders

Budget Holders are informed of the budget available to them at least one month before the start of the academic year. It is the responsibility of the Budget Holder to manage the budget and to ensure that the funds available are not overspent. A print detailing actual expenditure against budget is supplied to each Budget Holder a week after the end of each month and Budget Holders are encouraged to keep their own records of orders placed but not paid for.

PETTY CASH

In most instances the Trust discourages the use of petty cash by promoting the preferred procurement route. Where petty cash is not reimbursed by BACS, it is used for the purchase of minor items, which have been budgeted for. The petty cash float is maintained on the imprest system and the maximum

balance is £150. The float is reimbursed from the main bank account or appropriate resources. The petty cash tin is held in the safe.

Payments from petty cash are only made on production of a till receipt or other proof that payment has been made and cannot exceed £25 in value. Petty cash payments are subject to the same authorisation procedures as purchases from the main bank accounts. They are passed for payment by the Senior Finance Assistant. The person receiving reimbursement signs for the amount received.

The petty cash float is reconciled on a monthly basis by the Finance Assistant. The reconciliation is checked by the Senior Finance Assistant and initialled as evidence of this review. The Finance and Operations Director carries out a surprise count of petty cash at least once a year.

In no circumstances are:

- Personal cheques cashed through petty cash;
- Staff loans paid through petty cash.

The principal and CFO may authorise cash advances in exceptional circumstances where a member of staff will incur expenditure on behalf of the Trust. The member of staff completes a form acknowledging receipt of the money. Receipts are retained by the member of staff and provided to the finance office immediately following return to the Trust.

INCOME

The Board of Trustees has overall responsibility for ensuring that all income due to the Trust is properly accounted for. Day-to-day responsibility for this is delegated to the Finance and Operations Director. Income, including valuations for donated services and gifts in kind, is accounted for in accordance with the requirements set out in the Academy Trust Handbook.

Receipts are given for all amounts of non-grant income, including transfers between staff.

Controls over Incoming Funds

Provision of Services

The provision of services, such as private consultancy or other paid work or training outside of the employment contract with the Trust, is not permitted without the consent of the principal in the case of members of staff and by the Chair of Governors in the case of the Principal. Requests for approval must be submitted and authorised in writing. All fees receivable are invoiced by the Trust and paid in full into the Trust's bank account.

Postal Receipts

All incoming cheques and cash are recorded immediately, and entries verified by someone other than the person who has made the entry.

Fund-Raising Events

Records are maintained for each fund-raising event, in sufficient detail to identify gross receipts and how they have arisen, and all costs incurred.

For all events for which there is ticket income or gate money, reasonableness checks are carried out to ensure the takings equate to the number of tickets issued multiplied by the price per ticket.

Similar records are maintained for sponsored events.

Donations and Gifts

The Chief Financial Officer maintains a detailed record of all donations or gifts made to the Trust and ensures these are used in accordance with the purposes specified by the donors.

The Gift Aid Scheme (if applicable)

To ensure that the charity receives all the money to which it is entitled, the Finance and Operations Director:

- Makes regular checks against records to ensure that expected amounts have been received from the donor;

- Ensures that in the case of Gift Aid donations from individuals, the tax reclaimable has been obtained from HMRC;
- Is careful not to over claim tax repayments.

Letting of Trust Facilities

All lettings are subject to a letting agreement, setting out the terms and conditions of the Trust letting, including the agreed charge.

The Board of Trustees, on the recommendation of the Resource Committee, approves letting rates. Free use and charges below economic cost are not permitted.

- All hiring of Trust equipment and facilities is recorded on the letting planner kept by the Facilities Manager and in a lettings diary;
- The lettings diary and the letting planner are reviewed by the Senior Finance Assistant on a monthly basis to ensure that all lettings have been invoiced;
- When a letting is booked the hirer completes a hire form;
- The Finance Office generates sales invoices from the computer;
- All monies are received at the end of each term;
- One member of the Finance Office collects the cash and banks all receipts intact;
- The Trust ensures that relevant insurance is in place for each letting.

Trust Trips

Letters are sent to parents requesting payment for voluntary contributions.

All monies received for trips are paid to the Finance Office which collects the cash. The Finance Office is responsible for keeping adequate records of income and expenditure on a class list.

All receipts are banked intact.

The Finance Office prepares a final income and expenditure account for each trip which has taken place and reports these to the local FP&P Committee who ensure that money collected and expended for each trip is in accordance with the Trust's charging policy. Where a trip is overfunded by more than £5 per person the money is refunded accordingly.

Bad Debts

The Trust chases all money due to it, which has not been paid within 30 days of an invoice being issued, by telephone and letter, depending on how much time has elapsed since the money was due to be paid.

If a debt remains unrecoverable after one year, or, if during the year, it becomes clear that the debt will remain unpaid, the Finance and Operations Director submits a report to the Board of Trustees for approval to write off the debt.

Bad debts are only written off when the Trust has followed all possible procedures to ensure their recovery.

CATERING INCOME

The objectives of the catering policy are:

- To achieve a cashless catering system at the Trust for years 1 to 13, and staff.
- To improve managerial reporting related to catering income.
- To reduce the need for cash to be held by students within school.

The policy:

- All new students and employees will be issued with a ParentPay/WisePay username and password by the Trust IT department. They will be encouraged to use this system as the preferred method of payment for topping-up their lunch money account.

- Pay Point cards will be issued by the Trust (upon request only) to those parents who wish to top up their son/daughter's lunch money account in local establishments. The Trust will provide the first card free of charge; any subsequent cards will be charged to the parent at a cost of £3.00 plus VAT.
- Overdraft balances are allowed up to a maximum of £2.50p. Once this limit is breached the catering staff reserve the right to withdraw services until the account is restored to a positive balance. Students in their final term do not qualify for an overdraft facility.

The procedures:

Parent Pay/WisePay

Payments credited to the ParentPay/WisePay website are paid to the Trust every fortnight via a direct credit under the terms and conditions of the ParentPay/WisePay Collection Service. The payment received is net of the ParentPay/WisePay charges. In order to reconcile this entry on the Trust bank account:

- Print a copy of the Collection Service invoice and statement.
- Ensure that the statement totals agree with the credit entry on the bank statement.
- Record the entry in the accounting system on the nominal ledger

Manual Receipt of Cash

- Any cash received from a student or staff member for their lunch money account is recorded on the computer immediately. This allows the payee to witness the funds being added to their account.
- The weekly total of cash received is reconciled against reports from the computer system by the Finance Assistant. The reconciliation is checked by the Senior Finance Assistant.
- This money is banked weekly and then recorded in the account system on the nominal ledger as a weekly total.

BANK AND CASH

Bank Facilities

Only the Board of Trustees can authorise the opening or closing of bank accounts.

The Trust does not overdraw its bank account or arrange with its bankers for overdrafts, loans or any other form of credit or deferred purchases. The bank has been informed that the Trust is not allowed to borrow funds and that no account should be allowed to become overdrawn. The Trust does not offer any security to the bank. All funds surplus to immediate requirements are invested in accordance with the Board of Trustees' investment policy.

The Trust holds separate bank accounts for public and private funds, and public and private funds are separately accounted for.

All cheque payments from the bank accounts require two authorised cheque signatories. The signatories are all senior members of staff or governors. The Finance and Operations Director maintains an approved list of signatories (including specimen signatures). Cheques are not pre signed.

All cheques drawn are crossed 'account payee only'. All chequebooks and other stationery are kept in a locked cupboard or filing cabinet. All bank statements are filed sequentially.

Authorised signatories must not sign a cheque relating to goods or services for which they have also authorised the expenditure.

The operation of systems such as Bankers Automatic Clearing System (BACS) and other means of electronic transfer of funds are subject to the same level of control.

Bank Reconciliations

All bank accounts are reconciled on a monthly basis by the Senior Finance Assistant and the Finance and Operations Director reviews all reconciliations, signing them as evidence of review.

Cash Banking

Cash and cheques are locked in a secure place prior to banking to safeguard against loss or theft. All cash is banked intact, without delay and recorded on paying-in slips. Bank paying-in slips show the split of cash and cheques and reference cheques to the related debt. Cheques are identifiable by reference to the receipt numbers and names of the drawers and cash by reference to receipt numbers.

The Finance Office banks all cash and cheques. All cash and cheques are banked in accordance with the collection dates set out by the security company. Unbanked receipts are kept in a safe to safeguard against loss or theft. In no circumstances must cash holdings on the Trust premises exceed the insured limit.

The following banking procedures apply:

- All controlled (numbered) stationery, including banking bags, paying-in books, cheque books etc, is held securely and numbered items are used consecutively. If any item of numbered stationery is not used for any reason, the item is retained on file, together with an explanation as to why it was not used. There should be no item for which there is no account.
- Visits to the bank are made by two people if applicable.
- For cash collections:
 - The Trust ensures an appropriate till facility is in place, that receipts are issued and that cashing-up and reconciliation procedures are carried out daily.
 - The total sum passed to the Finance Office for banking is accompanied by the appropriate paperwork detailing the amount and details of the source of income, supported by names or receipts.
 - The total sum passed to the Finance Office is checked immediately and verified against the accompanying paperwork.
 - A receipt for the cash and cheques handed to the Finance Office is provided immediately.
 - Any discrepancies between the amount received and the details included in the paperwork are highlighted, queried and resolved immediately.
 - Income is brought to the Finance Office on a daily basis.
- These procedures also apply to miscellaneous cash collections from within the Trust, for example, school trips, resit examinations and staff events. In addition, a separate record of the various collections, supported by documentation, is held for each event/activity.
- Cash and cheques received by the Finance Office and their accompanying stationery are transferred to the safe immediately, and not held elsewhere.
- The banking bag and accompanying forms are prepared as soon as possible and at least on a daily basis. This includes the completion of a numbered paying-in slip which is not detachable from its book and which reconciles with the receipt issued. The name of the person who has prepared the banking is included on the slip.
- Cheques and cash received for the same event/activity are accounted for on the same paying-in slip and within the same banking bag, i.e. not separated. Bank paying-in slips show the split of cash and cheques and reference cheques to the related debt. Cheques are identifiable by reference to the receipt numbers and names of the drawers and cash by reference to receipt numbers.
- The member of staff who has prepared the banking bag and accompanying stationery enters the amount on the accounting software on that same day. This entry matches the receipt issued.
- Visits to the bank for the purposes of paying in cash and cheques are kept to a minimum for security reasons because the Trust arranges cash collections through a courier.
- Where unusually high levels of cash are received, these are banked on the day of receipt.
- Where visits to the bank are necessary, banking is carried out, normally by the same person, accompanied by an independent member of staff who does not work in the Finance Office. The following procedures apply:
 - The member of staff who delivers the income to the bank signs the stub of the paying-in book, by way of a record of the visit, and a dated bank stamp is obtained.

- Under no circumstances is the bank shoot used as a method of paying in.
- In no circumstances do cash holdings on the Trust premises exceed the insured limit.
- The transaction is reconciled to the accounting system upon receipt of the bank statement and verified against the paying-in book and original receipt.
- The school gives due consideration to the separation of duties in relation to banking procedures.

Key Holders

Key holders to the safe are authorised by the Resource Committee/Local FP&P Committee and keys to the safe are held securely at all times. Any loss of a key to the safe or the Finance Office is reported to the Chief Financial Officer immediately.

FIXED ASSETS

Asset Register

The Finance and Operations Director and ICT Manager maintain the asset registers. The Trust includes details of all assets with a cost greater than £1,000, and 'attractive' items below that value, in the asset register. The register records:

- Asset description;
- Asset number;
- Serial number for IT equipment;
- Date of acquisition;
- Asset cost excluding VAT where applicable;
- Source of funding (% of original cost funded from DfE/YPLA/ESFA grant and % funded from other sources);
- Expected useful economic life and residual value;
- Depreciation;
- Current book value;
- Location.

Items used by the Trust but owned by others are included, with a note of ownership. Items under finance leases are identified as such with the termination date of the lease.

The Finance and Operations Director checks that the asset register has been maintained twice annually. Any discrepancies are investigated and reported to the Chief Executive who informs the Board of Trustees of the loss and any known reason for this. The insurers are notified as appropriate.

Any assets removed from the Trust site are recorded in a loan book.

The length of time the asset will be off site is recorded together with the appropriate authority. The appropriate authority is the Finance and Operations Director. The Finance Office checks that assets will be insured before they are removed from the Trust. No assets are removed from the Trust for a period of time, which would unreasonably deny the Trust use of those assets.

All assets are security marked.

Disposal of Assets

All disposals and write-offs of assets are authorised by the Finance and Operations Director. Items no longer required are sold when their estimated residual value exceeds £500.

Disposal of equipment to staff is not encouraged, as it may be more difficult to evidence the Trust obtained value for money in any sale or scrapping of equipment. In addition, there are complications with the disposal of computer equipment, as the Trust would need to ensure licences for software programmes have been legally transferred to a new owner.

All disposals of land, buildings and heritage assets (as described above) must be agreed in advance with the Education Secretary.

The Trust ensures that any disposal maintains the principles of regularity, propriety and value for money. This may involve public sale where the assets have a residual value.

The following records are kept for disposals as part of the register of fixed assets:

- The item disposed of;
- The date of disposal;
- The method of disposal;
- The proceeds of sale or how disposed of if scrapped;
- The person authorising the disposal.

No item is sold, leased or hired to a third party without the approval of the Finance and Operations Director.

Losses

All losses are reported to the Finance Office. The Finance Office informs the police if the loss is a result of burglary or theft and the insurance company is informed at the same time. Action is taken immediately to prevent further loss.

The Finance Office maintains a record of losses and insurance monies received. The Board of Trustees is informed of all losses.

LEASING

In considering leases, Trusts need to be aware that there are two types of lease, as defined under relevant financial reporting standards. There are finance leases (which are a form of borrowing) and there are operating leases (which do not involve borrowing). Where in doubt as to whether or not any particular lease does or does not involve an element of borrowing the Trust will resolve the issue by contacting their external Auditor.

The Trust must seek and obtain prior written approval from the Education Secretary, via the ESFA, for the following leasing transactions:

- Taking up a finance lease on any class of asset for any duration from another party, as this would represent borrowing;

If the Trust does wish to enter into a lease that requires the Education Secretary's consent, then the Trust will contact the ESFA in the first instance. Trusts must ensure that any lease arrangement maintains the principles of regularity, propriety and value for money, whether or not the approval of the Education Secretary is required.

- Lease term of more than five years; and
- Granting a leasehold interest, including a tenancy agreement, on land or buildings to another party, pursuant to the obligations on the Trust in the Academies Act 2010.

The Board of Trustees is responsible for approving all leasing and long-term hiring arrangements.

No leased item is disposed of without the express permission of the leasing company. This includes sale, part exchange, scrapping, writing off, donating, re-leasing, subletting or any other form of disposal.

FRAUD

The Trust must notify the ESFA, as soon as is operationally practical based on its particular circumstances, of any instances of fraud or theft exceeding £5,000 individually, or £5,000 cumulatively in any financial year. Any unusual or systematic fraud, regardless of value, must also be reported.

The following information is required:

- Full details of the event(s) with dates.

- The financial value of the loss.
- Measures taken by the Trust to prevent recurrence.
- Whether the matter was referred to the police (and why if not).
- Whether insurance cover or the risk protection arrangements have offset any loss.
- The Trust must be aware of the risk of cybercrime and put in place proportionate controls and take appropriate action where a cybercrime has taken place. The Trust must obtain the permission of the ESFA to pay any cybercrime ransom demands – this action is discouraged by the National Crime Agency.

INVESTMENTS

Investments are made only in accordance with written procedures approved by the Board of Trustees.

Investments can be a good source of funding but can also expose the Trust to risks.

A financial investment is when an investment is made to get the best financial return within the level of risk considered to be acceptable. The Charity Commission (2016) advises that trustees have several legal responsibilities when making financial investments

Investments are recorded in sufficient detail to identify the investment and to enable the current market value to be calculated. The information required will normally be the date of purchase, the cost and a description of the investment. Additional procedures may be required to ensure any income receivable from the investment is received.

When considering making an investment, the Board of Trustees must:

- Act within their powers to invest as set out in their articles of association.
- Have an investment policy to manage, control and track their financial exposure, and ensure value for money particularly if using unfamiliar investment techniques.
- Exercise care and skill in all investment decisions, taking advice as appropriate from a professional adviser, unless they have good reason for not doing so.
- Ensure that security takes precedence over revenue maximisation.
- Select investments that are right for the school. This means taking account of:
 - How suitable any investment is for the school.
 - The need to diversify investments.
- Follow certain legal requirements if they are going to use someone to manage investments on their behalf.
- Ensure that all investment decisions are in the best interests of the Trust and command broad public support.
- Review the Trust's investments and investment policy regularly.
- Explain their investment policy in their annual report.

Trustees must be clear about what they aim to achieve through financial investment. They must consider exactly what they want to do, how they intend to do it and what the timescale will be. They must also consider the school's long and short-term financial commitments as well as its expected income.

Risk

A certain degree of risk is associated with all investments so trustees must do all they can to manage risk levels. Before any investment decisions are made, trustees must consider the level of risk they are able to accept. They must be satisfied that the overall level of risk they are taking is appropriate for the school. Losses may result in a low return on an investment, or the complete loss of all money invested. If this occurs, trustees should review their approach to risk and take the opportunity to learn from their experiences.

Investment Policy

The Trust is careful with the public money we are entrusted with. We carefully invest any money that is not required to cover anticipated expenditure and take steps to manage the risk associated with financial investments.

Objectives and Targets

The purpose of this policy is to ensure that any surplus funds are invested well so that they achieve the best financial returns with the minimum risk. Good financial returns mean that more money can be spent on educating pupils.

Action Plan

Adequate cash balances must be maintained to ensure that there are always sufficient funds in the school's current account to cover financial commitments such as payroll and day-to-day expenses. If there is a surplus of funds after all financial commitments have been considered, this surplus will be invested. Funds may only be invested with the following banks and building societies:

- [Bank/building society one]
- [Bank/building society two]
- [Bank/building society three]
- Treasury deposits that allow access to funds with fewer than [x] weeks' notice.

Funds should be invested in tranches of up to [£ amount]. It may be beneficial to invest each tranche with a different financial institution. Funds, and any interest they earn, will be automatically reinvested, unless they are required for immediate or anticipated expenditure.

Monitoring and Evaluation

The Finance and Operations Director will compare alternative investment opportunities every three months to ensure that the school's funds achieve the best interest rates.

The Chief Executive/Finance and Operations Director is responsible for ensuring that this policy is adhered to.

FREEDOMS AND DELEGATIONS AND TRANSACTIONS REQUIRING ESFA CONSENT

Novel, Contentious and Repercussive Transactions

Novel payments or other transactions are those of which the Trust has no experience or are outside the range of normal business activity for the Trust. Contentious transactions are those which might give rise to criticism of the Trust by Parliament, and/or the public, and/or the media. Repercussive transactions are those which are likely to cause pressure on other Trusts to take a similar approach and hence have wider financial implications.

Novel, contentious and/or repercussive transactions must always be referred to the ESFA for explicit prior authorisation. The ESFA may also need to refer such transactions to HM Treasury for approval and so Trusts should allow sufficient time for proposals to be considered.

Borrowing

The Trust must seek ESFA's prior approval for borrowing (including finance leases and overdraft facilities) from any source, where such borrowing is to be repaid from grant monies or secured on assets funded by grant monies, and regardless of the interest rate chargeable.

Credit cards must only be used for business (not personal) expenditure, and balances cleared before interest accrues.

Write-offs and Entering into Liabilities

The Trust must obtain the ESFA's prior approval for the following transactions beyond the delegated limits of the two categories set out below:

- Writing-off debts and losses.

- Entering into guarantees, letters of comfort or indemnities which are not in the normal course of business.

The delegated limits, subject to a maximum of £250,000, are:

- 1% of total annual income or £45,000 (whichever is smaller) per single transaction.
- Cumulatively, 2.5% of total annual income in any one financial year per category of transaction for any trust that has not submitted timely, unqualified audited accounts for the previous two financial years. This category includes new academies that have not had the opportunity to produce two years of audited accounts.
- Cumulatively, 5% of total annual income in any one financial year per category of transaction for any trust that has submitted timely, unqualified audited accounts for the previous two financial years.

In relation to these limits:

- The Trust should always pursue recovery of amounts owed to it, overpayments, or payments made in error, irrespective of how they came to be made. In practice, however, there will be both practical and legal limits as to how cases should be handled.
- The Trust should only consider writing-off losses after careful appraisal of the facts, including whether all reasonable action has been taken to effect recovery from the debtor, the Trust's insurers, or the risk protection arrangements, and should be satisfied that there is no feasible alternative.
- The amounts for write-offs are before any successful claims from an insurer or the risk protection arrangements.
- Total annual income is defined as grant income as disclosed in the Trust's last set of audited accounts. The ESFA should be contacted if the Trust has not yet published their first set of audited accounts

Before accepting any liabilities for the following, the Trust should secure value for money by appraising the proposal through an assessment of the costs and benefits of relevant options.

The liabilities are:

- Issuing guarantees.
- Providing a letter of comfort.
- Providing indemnities.

Indemnities

In any contract, an indemnity is a clause under which one party promises to protect the receiving party against loss, by paying money on the happening of a specified event. Effectively indemnities are used to allocate risk within agreements between the parties entering it.

Academy trusts do not require prior approval to enter into contractual indemnities that would be considered part of the normal course of business.

For academy trusts the ESFA considers these types of contracts to be part of the normal course of business:

- A catering contract that supplies catering services to students and staff.
- A data-sharing agreement that ensures information transfers between organisations.
- An energy contract that supplies electricity / water / gas to the trust's buildings.
- A commercial IT contract which supports the academy trust to run business as usual.
- A land transaction contract for the buying or transfer of land to a trust.

Therefore, the Trust:

- Assesses contracts that contain indemnities to understand whether they are within the normal course of business.
- Maintains a contract register of known indemnity clauses with the necessary assessments.

Trustees should also provide the appropriate oversight and challenge to the Trust to ensure the appropriate assessments and record management is maintained.

Academy trusts must obtain their own independent legal advice before entering into any contractual agreement and ESFA approval is only needed when indemnities are novel, contentious, or repercussive and are therefore not considered part of the normal course of business.

Special Payments

Special payments are transactions that fall outside a Trust's planned range of activities and may exceed statutory and contractual obligations. They are subject to greater control than other payments and include:

- Staff severance payments.
- Compensation payments.
- Ex gratia payments.

Special Staff Severance Payments

Special staff severance payments are paid to employees, outside of normal statutory or contractual requirements, when leaving employment in public service whether they resign, are dismissed or reach an agreed termination of contract. They are different to ex-gratia payments.

If the Trust is considering making a staff severance payment above the statutory or contractual entitlements, it must consider the following issues before making a binding commitment:

- That the proposed payment is in the interests of the Trust.
- Whether such a payment is justified, based on a legal assessment of the chances of the Trust successfully defending the case at employment tribunal. If there is a significant prospect of losing the case, then a settlement may be justified, especially if the costs incurred in maintaining a defence are likely to be high. Where a legal assessment suggests that the Trust is likely to be successful, then a settlement should not be offered.
- If the settlement is justified, the Trust would then need to consider the level of settlement. This must be less than the legal assessment of what the relevant body (e.g. an employment tribunal) is likely to award in the circumstances.

Staff severance payments should not be made where they could be seen as a reward for failure, such as gross misconduct or poor performance. The only acceptable rationale in the case of gross misconduct would be where legal advice is that the claimant is likely to be successful in an employment tribunal claim because of employment law procedural errors. In the case of poor performance, an acceptable comparison would be the time and cost of taking someone through performance management and capability procedures.

The Trust has delegated authority to approve individual staff severance payments provided any non-statutory/non-contractual element is under £50,000. Where the Trust is considering a non-statutory/non-contractual payment of £50,000 or more, the ESFA's prior approval must be obtained before the Trust makes any binding offer to staff.

Academies should demonstrate value for money by applying the same level of scrutiny to a payment under £50,000 as if it were over the £50,000 delegation. The ESFA has produced guidance and a submission template.

Additionally, the Trust must obtain prior ESFA approval before making a staff severance payment where:

- An exit package which includes a special severance payment is at, or above, £100k.

- And/or the employee earns over £150k.

Trusts must ensure that the use of confidentiality clauses associated with staff severance payments do not prevent an individual's right to make disclosures in the public interest (whistleblowing) under the Public Interest Disclosure Act 1998.

Compensation Payments

Compensation payments are made to provide redress for loss or injury, for example: personal injuries; traffic accidents; or damage to property. If the Trust is considering making a compensation payment, it must base its decision on a careful appraisal of the facts, including legal advice where relevant, and ensure that value for money will be achieved.

The Trust has delegated authority to approve individual compensation payments provided any non-statutory/non-contractual element is under £50,000. Where the Trust is considering a non-statutory/non-contractual payment of £50,000 or more, the ESFA's prior approval must be obtained.

The Trust routinely considers whether particular cases reveal concerns about the effectiveness of internal control systems and takes any necessary steps to put failings right.

Ex-gratia Payments

Ex-gratia payments are another type of transaction that go beyond statutory or contractual cover, or administrative rules. Annex 4.13 of HM Treasury's *Managing Public Money* provides examples, which include payments to meet hardship caused by official failure or delay, and payments to avoid legal action on the grounds of official inadequacy.

Ex-gratia transactions must always be referred to the ESFA for prior authorisation. HM Treasury approval may also be needed depending on the nature of the transaction. If academies are in any doubt about a proposed transaction, they should seek prior advice from the ESFA.

Acquisition and Disposal of Fixed Assets

Academies must seek and obtain prior written approval from the ESFA for the following transactions:

- Acquiring a freehold of land or buildings.
- Disposing of a freehold of land or buildings.
- Renting out a property owned by the Trust, such as a house.
- Disposing of heritage assets beyond any limits set out in the Trust's funding agreement in respect of the disposal of assets generally. Heritage assets are assets with historical, artistic, scientific, technological, geophysical or environmental qualities that are held and maintained principally for their contribution to knowledge and culture, as defined in applicable financial reporting standards.

Other than land, buildings and heritage assets, academies can dispose of any other fixed asset without the ESFA's prior approval. The Trust ensures that any disposal achieves the best price that can reasonably be obtained, and maintains the principles of regularity, propriety and value for money.

GLOSSARY OF TERMS

Chief Executive
Finance & Operations Director
Trust Facilities Manager

Stephen Munday
Mark Norman
Jan Berridge

Principal – Cambourne Village College
Principal – Comberton Village College
Executive Principal – Melbourn Village College / St. Peters
Headteacher – Melbourn Village College
Headteacher – St, Peter’s School

Lynn Mayes
Peter Law
Christopher Bennet
Niki Smith
Emma Butler

Executive Headteacher – West Village Partnership Schools
Headteacher – Everton Heath Primary School
Headteacher Gamlingay Village Primary
Headteacher – Offord Primary School*

Shelley Desborough Head)
Katie May
Dawn Henry
Kate Ruddock

Executive Headteacher – Jeavons Wood
Acting Headteacher – Jeavons Wood Primary
Headteacher – Hartford Junior & Hartford Infant Schools

Sue Wright
Emily McMurray
Rae Lee

Headteacher – Thongsley Fields Primary School

David Jones

Senior Finance Assistant – Cambourne Village College
Senior Finance Assistant – Comberton Village College
School Business Manager – St Peter’s School
School Business Manager – Jeavons Wood Primary School
Finance Assistant – Everton Heath Primary School
Finance Assistant – West Village Partnership
Finance Assistant – Hartford Junior School
Finance Secretary – Hartford Infant School
Finance Assistant – Jeavons Wood Primary School
Finance Assistant – Melbourn Village College
Finance Assistant – Thongsley Fields Primary School

Carole Sayer
Stacey Bell
Carolyn Ducket
Linda Ogilvie
Sarah Dickinson
Pauline Davies
Elaine Rudd
Natalie Hayhoe
Nicola Ellender
Jennifer Miller
Wayne Law

