



THE TAPSCOTT LEARNING TRUST

2022-23 FINANCE POLICY

SEPTEMBER 2022

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INTRODUCTION

The policy outlines the respective financial responsibilities of The Tapscott Learning Trust (TTLT) and its Trustees. The policy also provides a standardised approach to all finance related tasks within the Trust and its academies, and is supported operationally by the Finance Procedure Manual.

Please note this policy should be used in conjunction with the ~~Academies Financial~~ Academy Trust Handbook 2022.

The Chief Executive Officer (CEO) and the Board of Trustees have overall accountability for the Trust.

1. ROLE OF THE CHIEF EXECUTIVE (CEO)

The Chief Executive has overall responsibility and accountability for all the Trust's activities.

1.1 The Funding Agreement requires the Chief Executive to also be the Accounting Officer who is personally responsible to the Trustees for:

- ensuring regularity and propriety;
- prudent and economical administration;
- avoidance of waste and extravagance;
- efficient and effective use of available resources; and
- day to day organisation, staffing and management of the Trust.

1.2 The essence of the role is a personal responsibility for:

1.2.1 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 internal trust procedures. This includes spending public money for the purposes intended by Parliament;

1.2.2 Propriety – the requirement that expenditure and receipts should be dealt with in accordance with Parliament's intentions and principles of Parliamentary control. This covers standards of conduct, behaviour and corporate governance;

1.2.3 Value for money – this is about achieving the best possible educational and wider societal outcomes through the economic, efficient and effective use of all the resources in the trust's charge, the avoidance of waste and extravagance, and the prudent and economical administration. A key objective is to achieve value for money not only for the academy trust but for taxpayers more generally.

1.2.4 The Trust's accounting officer is required to complete and sign a short statement each year explaining how the trust has secured value for money. This must be approved by the Trust Audit and Finance Committee and then sent to the ESFA and be published on the academy trust's website. It will also be placed on the DfE's website.

In practice, much of the financial responsibility is delegated to the Trust's Finance Director and the Business and Finance Team which consists of the School Business Managers and Finance officers of the academies within the Trust.

2 ROLE OF TRUSTEES

The TTLT is a company limited by guarantee with charitable status. It comprises members of the Trust and has a strategic role in running the Academies, with control over its land and assets.

The trustees **must** apply the highest standards of conduct and ensure robust governance, as these are critical for effective financial management. They should follow the Governance Handbook, which describes the following features of effective governance and will aid compliance with the Academy Trust Handbook 2022:

- **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

The main responsibilities of the Trust are prescribed in the Funding Agreement with the DfE.

2.1 Proper and regular use of public funds

In accordance with the Academy Trust Handbook 2022, the academy must ensure that: Spending has been for the purpose intended.

- No trustee, governor, employee or related party has benefited personally from the use of funds.
 - All trustees have completed the register of business interests (also called pecuniary interests) and the Trust must ensure 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 and, where applicable, comply with the terms of any relevant agreement entered into 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.
- 2.2 The members and directors that sit on the Board as Trustees have certain obligations to protect the assets, property and good name of the Trust.
- 2.3 The Trust has defined the responsibilities of key committees and staff involved in the administration of Academy finances to provide a framework of accountability for governors and staff.

The Committees that have responsibilities relating to the Academy finances are as follows:

- Trust Board
- Audit and Risk Committee (ARC)
- Finance, Operations and Resources (FOR)
- Safeguarding and Standards Committee (SSC)

The main responsibilities of these Committees are set out in written terms of reference approved by the full Trust board.

3 ROLE OF THE FINANCE DIRECTOR (& BUSINESS AND FINANCE TEAM)

3.1 The Finance Director (and Business and Finance Team) works in close collaboration with the Chief Executive through whom s/he is responsible to the Trustees. The main responsibilities of the Finance Director (& business and finance team) are:

- the day to day management of financial issues including the establishment, maintenance and operation of a suitable accounting system for Trust's central budgets and individual academies;
- the management of the Trusts financial position at a strategic and operational level within the framework for financial control determined by the Trustees;
- preparation of budgets in conjunction with the Chief Executive and Head Teachers; and in line with the Academy Trust Handbook 2022.
- the maintenance of effective systems of internal control;
- ensuring that the annual accounts are properly presented and adequately supported by the underlying records;
- ensuring that the annual accounts are submitted to the Finance, Operations and Resources or and Audit and Risk committee and Trustees board for approval.
- the preparation of monthly management accounts;
- authorising orders, contracts and signing cheques / releasing payments in conjunction with the Chief Executive or other authorised signatory in accordance with the agreed Scheme of Delegation (SoD);
- ensuring all required submissions and returns are completed accurately and submitted to the ESFA in line with any timelines;
- ensuring the accuracy and integrity of the Trust's payroll;
- ensuring regular communication with the responsible officer and auditors; and
- Obtaining legal advice when appropriate.

4. DELEGATED AUTHORITY

The delegated authority over different categories of financial transactions is set out below from the DfE:

4.1 Liabilities and write-offs

The academy trust **must** obtain ESFA's prior approval for the following transactions beyond the delegated limits described below:

- writing-off debts and losses
- entering into guarantees, letters of comfort or indemnities
- entering into indemnities which are not in the normal course of business

4.2 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 financial year per category of transaction for trusts that have not submitted timely, unqualified accounts for the previous two financial years. This category includes new trusts that have not had the opportunity to produce two years of audited accounts
- cumulatively, 5% of total annual income in any financial year per category of transaction for trusts that have submitted timely, unqualified accounts for the previous two financial years.

In relation to the limits above:

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

4.2.1 Severance Payments

If the Trust is considering making a staff severance payment above the contractual entitlement, it must consider the following issues:

- Whether such a payment is justified, based on a legal assessment of the chances of the Trust successfully defending the case at tribunal. If the legal

assessment suggests a better than even chance of winning, there is no rationale for settling the case. But where the case will be lost, there is a justifiable rationale for the settlement.

- 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.
- Special severance payments should not be made where they could be seen as a reward for failure, such as dismissal for gross misconduct or poor performance. The only acceptable rationale in the former case would be where the claimant will win an Employment Tribunal claim because of employment law procedural errors. In the latter, an acceptable comparison would be the time and cost of taking someone through performance management and improvement procedures.
- If the Trust is considering making a compensation payment it must consider whether the proposed payment is based on a careful appraisal of the facts, including legal advice and that value for money will be achieved. It is also good practice to consider routinely whether particular cases reveal concerns about the soundness of the control systems; and whether they have been respected as expected. It is also important to take any necessary steps to put failings right.

Additionally, in accordance with HM Treasury's Guidance on Public Sector Exit Payments, the trust must obtain prior ESFA approval before making a special staff severance payment where the Trust is considering making a special staff severance payment or compensation payment where:

- an exit package which includes a special severance payment is at, or above, £100,000; and/or
- the employee earns over £150,000.'

4.2.2 Asset sales, leases and tenancy agreements

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

- acquiring a freehold of land or buildings
- disposing of a freehold of land or buildings
- disposing of heritage assets, as defined in financial reporting standards, beyond any limits in the funding agreement for the disposal of assets generally.

4.2.3 Other than land, buildings and heritage assets, trusts can dispose of other fixed asset without ESFA's approval subject to achieving the best price that can reasonably be obtained, and maintaining the principles of regularity, propriety and value for money.

The Trust may take out and grant other types of lease (i.e. other than finance leases, leaseholds and tenancy agreements as described above), without the Secretary of State's approval. For the avoidance of doubt this means that operating leases on assets that are not land and buildings do not require the Secretary of State's approval.

4.3 Leasing

There are two types of lease:

- finance leases: these are a form of borrowing
- operating leases: these are not borrowing

Trusts **must** obtain ESFA's prior approval for the following leasing transactions:

- taking up a finance lease on any asset for any duration from another party
- taking up a leasehold or tenancy agreement on land or buildings from another party for a term of seven or more years
- granting a leasehold interest, including a tenancy agreement, of any duration, on land and buildings to another party

Other than the above, trusts do not require ESFA's approval for operating leases.

Trusts **must** ensure any lease maintains the principles of value for money, regularity and propriety. Trusts should seek advice from their professional adviser and/or external auditor if they are in doubt over whether a lease involves borrowing.

5. REGISTER OF INTERESTS (PECUNIARY INTERESTS): Trustees and relevant staff

The Trust maintains a register of the business interests of each member, director, 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 academy may wish to buy goods and 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 decision are made.
- Any governor or member of staff who has an interest in the business tendering for a contract does not form part of the committee awarding the contract.
- Any Trustees, Local Advisory Board members 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.

Trustees, Local Advisory Board members and members of staff are required to inform the academy 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.

The minutes of Trust meetings, Trust committee meetings, LAB meetings or any other committee which can influence a buying decision record a standard agenda point seeking updates to 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 academy has or may have dealings with the company.

The register is freely available for inspection by governors, staff and parents and listed on the school and Trust websites.

5.1 Receipts of gifts, hospitality, entertainment and other services

Trustees, Local Advisory Board members and members of staff 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 academy maintains a register of gifts and favours offered and whether these were accepted or rejected. Governors and members of staff are required to inform the academy of such offers as they arise.

The Trust Gifts and Hospitality form is at Appendix 5.

5.2 Expenditure on gifts, hospitality, entertainment and favours

The full governing body must approve any expenditure on gifts, hospitality, ex-gratia payments and losses to be written off. The academy maintains a log of these. Such expenditure is only authorised if the governing body 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. Modest hospitality is occasionally provided outside the workplace. The Head Teacher and Trust maintains a register of the occasions when hospitality is provided, the number of people involved and the costs incurred

The Trust's funds must not be used to purchase alcohol for consumption.

Private use

The academy does not obtain goods or services for the private use of Trustees, Local Advisory Board members and members of staff. Governors and members of staff may not:

- hold any interest in any equipment or property held or used for the academy
- acquire any interest in the disposal of academy equipment or property at the end of any contract between the academy and any third party.

6. INDEPENDENT SCRUTINY

- 6.1.1 The Trusts' Audit and Risk Committee (ARC) will direct and oversee the process of independent checking of financial controls, systems, transactions and risks.
- 6.1.2 The committee will review the risks of internal financial control at the Trust and agree an annual programme of work ,internal audit,that will address these risks, inform the statement of internal control and, so far as is possible, provide assurance to the external auditors.
- 6.1.3 This programme will be managed through one or more of the following options:
- the work of an internal audit service
 - the performance of a supplementary programme of work by the Trusts external auditors
 - completing the work by peer review

6.2 INVESTIGATIONS OF FRAUD AND IRREGULARITY

- 6.2.1 The responsibilities of the Accounting officer extends to the prevention of loss through fraud and irregularity. Also the board of trustees are similarly responsible for preventing such losses of public funds. Therefore Trustees must be aware of the risk of fraud and irregularity within their organisations and they must, as far as possible, address this risk in their internal control and assurance arrangements by putting in place proportionate controls.
- 6.2.2 The Trust is also responsible for ensuring appropriate action is taken where fraud and irregularity is suspected or identified.
- 6.2.3 All instances of fraud or theft committed against the Trust, whether by employees or governors or third parties, above £5,000 must be reported by the Trust to the ESFA. Any unusual example of fraud, regardless of value, must also be reported.

6.3 APPOINTMENT OF EXTERNAL AUDITORS

- 6.4 The Trust is required to submit audited accounts to the Department for Education (DfE) via the Education and Skills Agency (ESFA) annually. Therefore the Trust needs to appoint external auditors to carry out the audit. The appointment should be for a one year period renewable at the discretion of the Trust.

The auditors are required to give an opinion on whether:

- the financial statements have been prepared in accordance with the Financial Reporting and Annual Accounts Requirements issues by DfE;
- proper accounting records have been kept by the Academy throughout the financial year; and
- grants made by the ESFA have been applied for the purposes intended.

6.5 The Trust should arrange for on-going monitoring of the performance of the auditors to be undertaken.

6.6 Auditors will be appointed annually by the Trusts Audit and Risk Committee.

The Trust's External Auditors for 2021-22 are:

**Bishop Fleming LLP
Chy Nyverow
Truro
TR1 2DP**

7. TRUST CENTRAL BUDGETS AND DELEGATED FUNDING TO ACADEMIES

7.1 The Trust Finance, Operations and Resources Committee (FOR) will annually review the arrangements for the central maintenance of funding to fund the Trust's Infrastructure Budget and the Trust's Shared Services Budget. Local Advisory Boards will be consulted about any changes to these arrangements.

7.2 The Trust **FOR** will review, recommend to the Trust Board and monitor the Trust annual budget that consolidates individual academy budgets with the Trust central costs and charges, with a specific responsibility to ensure the Trust budget does not go into deficit.

7.3 In determining the Trust's central budgets, the Trust must have due regard to the funding needs and allocations of each individual academy. If an individual academy, LAB or Head Teacher feels that the academy has been unfairly treated in relation to pooling arrangements they should first apply to the CEO who has the responsibility to raise the matter with Trustees. If the grievance is not resolved they may appeal to the Secretary of State for Education.

8. INSURANCE ARRANGEMENTS

8.1 The Trust's Audit and Risk Committee (ARC) will ensure that such insurance necessary to cover risks to which the Trust, and individual academies are exposed, is in place. This cover will comply with the minimum requirements of the Education and Skills Funding Agency (ESFA) and the Department for Education (DfE)

8.2 The Trust's Business and Finance team, Head teachers of individual schools are responsible for identifying school specific areas of risks and for establishing procedures for reducing risks, where possible.

8.3 An up-to-date schedule of all insurances in place will be maintained by a nominated member of the Trust's Business and finance team. This schedule will make clear the specific insurance liabilities of the Trust's central costs and the individual academy budgets.

9. THE ROLE OF EACH SCHOOL & LOCAL ADVISORY BOARDs (LAB)

The section outlines the respective responsibilities of each Local Advisory Board, Head Teacher and staff in relation to financial administration.

9.1 SUMMARY OF RESPONSIBILITIES

The management of the school is, through its instruments of Government, the responsibility of its Local Advisory Board. The LAB delegates day to day responsibility for carrying out the policies and decisions of the LAB to the Head Teacher and School Administrative Team.

Management and administration duties undertaken by the Head Teacher and members of the school staff shall be carried out in accordance with the terms of this statement, and within the terms of their contract of employment.

It is the responsibility of each LAB to produce an annual budget for the school for submission to the Trust Board which accords with the school's aims and objectives, as set out in the current School Improvement Plan, and the legislative responsibilities undertaken by the Governing Body. Such approval should be clearly minuted by the LAB in sufficient time to allow prompt submission of the plan to the Trust Finance and Audit Committee and subsequent submission to the Board.

- The Head Teacher will prepare a recommendation for expenditure by reference to the anticipated budget provision of the school, sufficiently in advance of each financial year, in order to allow due consideration and approval by the LAB. The Head Teacher will advise the LAB on all areas of the school budget.
- Should an Academy not meet these responsibilities the board will assume control of the budget until such time that systems and structure are in place for the Academy to meet these responsibilities.

9.2 ROLE OF THE LOCAL ADVISORY BOARD

The role of the Local Advisory Board in school financial administration is:

- to establish a mechanism that allows it to review and monitor the schools budget and expenditure. This could be by the establishment of a Finance Committee or by having a LAB member with responsibility for finance
- to plan the overall school budget, including priorities for future expenditure
- submit the budget plan to the Trust's Business Board for approval
- to maintain a register of pecuniary interest for governors and staff
- to consider and sign the local Statement of Internal Control (SIC)

The LAB must ensure it has systems in place to ensure it satisfies the Trust's Audit and Risk Committee that it has:-

- planned the school budget in accordance with the priorities in the School Improvement Plan, and the school's staffing plan and fully understands any components that make up the school's budget
- considered reports from the Head Teacher comparing expenditure with budget and approve budget changes according to the agreed arrangements
- operated the Trust's arrangements for obtaining quotations and inviting tenders

- submitted to the Board any proposed write-offs and disposals of surplus stock and equipment
- operated the Trust's arrangements for any school fund or charitable funds held locally
- follow the Trust's limits of authority which they delegate to the Head Teacher and approve expenditure recommended by the Head Teacher above those limits,
- considered and acted upon the findings and recommendations of Responsible Officer, Audit Reports and findings identified by the Trust's Business and Infrastructure terms.

10. THE ROLE OF THE HEAD TEACHER/HEAD OF SCHOOL

- The day-to-day operation of the budget is delegated to the Head Teacher who will be accountable for;
 - preparing the school improvement plan and school budget in accordance with priorities agreed by the LAB and submission of these plans to the Trust for approval
 - managing internal control systems and internal financial transactions in accordance with the 'Academy Trust Handbook 2022'
 - maintaining adequate financial records in accordance with Academy Trust Handbook 2022:

As part of the budget setting process the LAB must review a written report containing sufficient information to assure them that the budget

- is affordable
- meets the needs of the pupils
- takes into account any planned or foreseeable changes in pupil numbers and therefore funding levels for future years
- fully informs them of those services that are being paid for from the Trust's infrastructure budget, the Trust's shared services budget and the local school budget (for which they are accountable)

It must also include information of how the pupil premium, or other such grants, will be spent.

10.1 THE ROLE OF THE INDIVIDUAL SCHOOL ADMINISTRATOR(S) (SCHOOL BUSINESS MANAGER AND FINANCE STAFF)

Subject to accordance with individual job descriptions the Head Teacher/ Finance Director may delegate financial procedures to the School Business Manager and other members of the administrative team. The administrative team's roles may include:

- reviewing the monthly salary reports and signing and dating these to confirm they are accurate and noting any queries
- providing budget monitoring/outrun reports to present to the governors
- submitting pay returns to payroll as appropriate
- ensuring that invoice checking procedures are followed
- ensuring that, in conjunction with the Head Teacher, authorisation of orders, invoices and schedules are in accordance with this Financial Administration & Control Policy and the Academy Trust Handbook 2022

- prompt and intact banking of income and associated recording of income in accordance with the Academy Trust Handbook 2022
- operating the bank account as per the Academy Trust Handbook 2022
- to prepare cash flow statements so as to ensure the school has sufficient cash to meet its needs and submit these to the finance committee
- administration and recording of income received, and payments made from the school fund. Retention of all documents such as collection records and receipts to support the transactions processed through the school fund. Preparation of the year end summary of transactions for inspection, in accordance with the Academy Trust Handbook 2022
- assisting in the maintenance of an accurate inventory and associated security procedures
- assist in the preparation of the three year budget plan and the financial returns to the ESFA
- return to Charity Commission for school fund account, if appropriate

10.2 THE ROLE OF THE STAFF

The role of staff in school financial administration is:

- to familiarise themselves with this Policy
- to conduct all financial transactions relating to the school in accordance with this Policy and the finance procedure manual
- to actively seek 'best value' on all work, goods, materials or services procured on behalf of the school
- to ensure that all relevant documents (delivery notes, invoices etc.) are promptly passed to the administrator for processing and appropriate records kept as required.

BUDGET SETTING REPORT

As part of the budget setting process the LAB must review a written report containing sufficient information to assure them that the budget

- is affordable
- meets the needs of the pupils
- takes into account any planned or foreseeable changes in pupil numbers and therefore funding levels for future years
- fully informs them of those services that are being paid for from the Trust's infrastructure budget, Trust's shared services budget and the local school budget (for which they are accountable)
- It must also include information of how the pupil premium, or other such grants, will be spent.

10.3 FINANCIAL REPORT TO GOVERNORS

The Head Teacher is responsible for providing the LAB and the Trust's Finance, Operations and Resources Committee with a report on the budgetary position of the school at regular

intervals. The report should be produced on a monthly basis and presented to LABs at least once a term.

Financial reports should be reliable and relevant to users, the characteristics of good quality financial information are:

- **Produced promptly.** Financial reporting should be carried out in line with the Academy Trust Handbook 2022
- **Accurate.** Actual expenditure appearing on the report should agree to what has been processed on the school's finance systems. There should be a monthly reconciliation of the bank account to the local system (school's finance system). Where amounts have been charged to the school and are still in dispute, these should still be included in the actual expenditure until queries have been resolved.
- **Complete.** To provide governors with a "true and fair" view of the school's financial position, the reports must include committed expenditure. For information to be complete expenditure that the school has been committed to including details of orders and invoices outstanding must be included.
- **Understandable.** Reports need to be understandable to the intended recipient; in particular financial reports to governors should be jargon free
- **Concise.** Reports should be summarised and not contain an unnecessary amount of detail. Expenditure and budget totals should be summarised to the headings contained in the annual ESFA funding statement and in the annual accounts.
- **Include a profiled budget.** To ascertain whether the level of expenditure to a given date is reasonable, the expected expenditure up to the same date should be provided by the inclusion of profiled budget based on knowledge of the school's spending patterns. ~~the profile looks at~~
- the total budget for the year and indicates what percentage of that budget it would be reasonable to have spent by the specified date.
- **Include explanatory notes.** Where there are significant variances on budget headings an explanation should be provided with the report. Proposed actions to address variances should also be reported and actions agreed should be minuted. Where large orders are due to be placed, this may also require a note to the report.
- **Include a projected out-turn** on at least a termly basis, which is an estimate of the final budget position of the school at the end of the financial year.

11. PROCUREMENT OF GOODS AND SERVICES

The procurement of goods and services is the process potentially most open to abuse or mismanagement and it is therefore essential to have strong financial controls to safeguard the school's interests. It is essential that all of the following controls are adhered to:

- orders should not be entered into verbally and unless a Purchasing Card has been used, orders should always be made using the Trusts Financial Management System. This system automatically updates the financial records and enables committed expenditure to be included in management information for governors.
- a purchase order request form must be completed prior to making any purchase.
- in exceptional circumstances (e.g. emergency repairs) orders may be placed by telephone. In such circumstances a confirmation order should be generated. Orders may be emailed to suppliers, in order to reduce timelines.
- orders may only be used for goods and services provided to the school, private individuals and other organisation may not use school systems to obtain work, goods, materials or services net of VAT.
- it is the responsibility of the Budget Holder in authorising the order to be satisfied that the work, goods, materials or services are appropriate and necessary, that there are adequate funds in the school budget for that purpose and that sufficient quotations/tenders have been obtained.

Any procurement undertaken must adhere to the agreed limits as set out in **Appendix 4**.

11a. EXPENDITURE ON TRAVEL AND SUBSISTENCE

Expenditure on travel or subsistence, whether it is through use of a purchase card or through own expenses claim, must follow the Travel and Subsistence policy.

11b. OPERATION OF LOCAL BANK ACCOUNT

When the school operates its own bank account the school must implement these controls:

- a list of signatories (mandate) should be drawn up whereby all payments have two authorised signatories, which must not include Governors
- no member of staff is permitted to authorise a Bacs run which includes a payment to themselves or to someone closely connected to themselves or in whom they have a pecuniary interest
- The mandate should be notified to the bank.

Arrangements must be made with the bank, and must include:

- a statement to be provided each month
- to disallow any overdraft or loan facilities offered by the bank
- To disallow the school from entering into investments of a speculative nature (e.g. money markets). However, deposit accounts are allowed. Automatic transfers to and from higher interest accounts upon balances reaching specified levels are permitted.

Direct debit payments - may be entered into for the payment of utility bills and other suppliers with whom the school has a regular contract. The value of each Direct Debit should be reviewed and compared with invoices received from the supplier. Suppliers paid by Direct Debit must be reviewed regularly to ensure they continue to provide Best Value.

The Trust and schools should produce monthly cash flow forecasts in accordance with the recommendations in the Academy Trust Handbook 2022 to ensure there are adequate funds in the bank to pay for the salaries and day to day expenditure.

12. SECURITY, INVENTORIES, STOCKS AND DISPOSAL OF ASSETS

An asset register should be maintained using the Inventory system. This should have a record of an adequate description of all moveable plant and machinery, vehicles, furniture, fittings and equipment belonging to the School, where the current valuation (for property) or the acquisition cost (for other assets) is greater than the following de-minimis levels:

1. Land and Buildings £5,000
2. Vehicles, Plant & Machinery and Other Equipment £3,000
3. Furniture & Fittings £1,000
4. Information Technology Equipment £1,000

- Records of all portable, desirable and valuable items (not included on the asset register) shall be maintained on the official inventory. Where inventories are maintained on a spreadsheet or database, a hard copy should be produced annually and retained.
- Inventories shall be kept up to date to record all items received or disposed of by whatever means. Records will show any income received from disposals and cross referenced to accounting records.
- Serial numbers included on the inventory should, wherever possible, be the manufacturer's serial number.
- Annually, a physical check of **all** inventory items should be carried out. All discrepancies shall be reported to the LAB and then the FOR committee.
- Safes must be kept locked and the key removed. Keys to safes and cash boxes must be kept secure. The loss of such keys should be reported to the Head Teacher/ Finance Director immediately.
- Money left on the premises shall be secured in a locked safe, where provided, or in a locked secure cabinet. The insurance limit for cash (and cheques) held in the safe is £1000 unless a higher limit is specifically agreed with insurance.
- Losses due to theft of stocks or cash shall be promptly reported to the Head Teacher and LAB.
- Steps must be taken by the Trust and Head Teacher to ensure that there are effective backup procedures for all computer systems. Recommendations for backup procedures should be regularly checked with the school's IT support provider.
- Arrangements should be made to ensure that only authorised staff have access to computer hardware and software used for school management. Passwords should not be disclosed or shared and should be changed regularly. Access rights of any staff leaving the school should be promptly revoked.
- The Head Teacher and the LAB shall comply with all regulations relating to the Data Protection Act 2018

Asset Disposal

In disposing of assets, items with a current value of less than £250 can be disposed of by the Head Teacher. Items disposed of above £250 (including stolen items) will need the authorisation of the Finance Director and reported to the LAB.

In disposing of IT equipment, an assessment should be made of such equipment to ensure that all sensitive data has been removed.

The monies received from the disposal of an asset will be credited to the School, irrespective of how the asset was initially acquired by the school. The income should not be credited to the school fund, or any other unofficial account.

In disposing of an asset, the Head Teacher is responsible for ensuring that the school is taking reasonable steps to secure the maximum revenue for the asset. This should be achieved by:

1. Taking reasonable steps to advertise the disposal;
2. Inviting bids for the asset (sealed bids are preferable);
3. Negotiating with potential purchasers.

The school business manager (SBM) is responsible for maintaining a register of assets/equipment loaned or taken off the premises by other establishments, staff or pupils. A separate register should be kept of long term loans (e.g. musical instruments) and loans relating to specific grants (e.g. computers at home initiative).

13. DEPRECIATION

Non-Current Assets are to be depreciated to reflect the recoverable amount in the financial statements, over the useful life of the asset. The depreciation will be calculated on an annual basis for preparation of the year end accounts.

Depreciation methods are as below:

ASSET GROUP	DEPRECIATION METHOD
Land	No depreciation
Buildings and Building modifications	2% (50 yrs) Straight line
Plant and Machinery	20% (5 yrs) Straight line with nil residual value
Furniture and Equipment	10% (10 yrs) Straight line with nil residual value
Computer Equipment and Software	33% (3 yrs) Straight line with nil residual value
Assets Under Construction	There are not depreciated until the asset is brought into use.
Motor Vehicles / Minibuses	20% (5 yrs) Straight line with nil residual value

Assets will be managed in line with the asset procedure attached as Appendix 3

14. CHARGING POLICY

CHARGING AND REMISSIONS POLICY

GENERAL PRINCIPLES

The Trust is committed to the general principle of free education and recognises the valuable contribution that a wide range of activities, including school visits, residential experiences and clubs, can make towards all aspects of pupils' education. The Trust would accordingly wish to promote and provide as far as possible such activities as part of a broad and balanced curriculum for the benefit of pupils of the school.

LABs are required to follow the Trust's charging policy.

Policy attached as Appendix 4

14.1 PAYMENTS TO INDIVIDUALS

The school has a responsibility for ensuring that all payments to individuals are subject to tax and national insurance deductions where appropriate, in accordance with IR35 regulations. In order to achieve this, the following guidelines should be followed:

- An assessment must be made and retained, using HMRC's Check Employment Status for Tax (CEST) tool as to whether the individual is providing a contract of services (i.e. employed) or a contract for services (i.e. self-employed in line with IR35). If considered to be a contract of service, the individual shall be set up as an employee of the school before receiving payment through the payroll.
- Where an individual seeks payment from the school for a contract for services, this must be in the form of an invoice.

Careful attention should be paid to repetitive payments to individuals.

14.2 RECEIVING INCOME

Income generated by the school will be received by finance or administration staff from a number of sources. All income shall:

- be paid into the school's official bank account without delay or deduction
- be banked prior to any school closure exceeding twenty-four hours
- be collected in advance of service delivery wherever possible
- be acknowledged by official receipts and accounted for without delay, with all such receipts held securely to prevent misuse
- be identified by means of any appropriate accountancy code
- not be used to discharge expenditure

Where income is to be collected after the service has been provided, an official invoice shall be issued and submitted without delay, to the debtor.

All income shall be held securely until banked and shall be acknowledged in writing when transferred from one person to another.

All payments banked shall be by means of an official bank paying-in book, separately identifying cash,

The school shall determine a maximum amount of income to be held securely in line with guidance by the Trust Audit and Risk committee. The school shall not exceed the agreed limit.

15. WHISTLEBLOWING

The Trust's whistleblowing policy (Appendix 2) is as attached.

It is the responsibility of the CEO to ensure that all centrally employed MAT staff and directors are aware of this policy. It is the responsibility of the Head Teacher/Principal of each member school to ensure that all staff at the school are aware of the policy and that all new staff are informed about the policy as part of induction procedures.

16. RESERVES AND INVESTMENT POLICY

PURPOSE AND SCOPE

The purpose of the Reserves and Investment Policy is to set an ongoing operational reserves target and to ensure that surplus is properly and prudently managed.

DEFINITION OF DUTIES

Spelling out core duties helps everyone in process to understand their tasks and avoid confusion.

Board of Trustees – the board has the ultimate fiduciary duty for investment portfolio. The board is responsible for ensuring that appropriate policies governing the management of reserves are in place and that they are implemented. TTLT's Articles of Association gives the Board of Trustees the power “to expend the funds of the Trust in such manner as they shall consider most beneficial for the achievement of the Objectives and to invest in the name of the Trust such part of the funds as they may see fit and to direct the sale or transposition of any such investments and to expend the proceeds of any such sale in furtherance of the Objectives.

Audit and Risk Committee (ARC) - whilst the Board of Trustees has responsibility for the Trust's finances, the Scheme of Delegation approved by the Governing Body delegates responsibility to the Audit and Risk Committee (ARC). ARC is to approve the investment strategy, select financial counterparties, control and track financial exposure, and monitor the Trust's investments and investment policy on an ongoing basis.

MAT's Finance Director (FD) - is responsible for producing reliable cash flow forecasts as a basis for decision making. ARC is responsible for making investment decisions that comply with this Policy and the FD is responsible for providing sufficient management information to the Audit and Risk Committee so it can review and monitor investment performance.

OBJECTIVES

The objectives are:

- to maintain operational reserves of 5% of previous year's annual income (this equates to approximately £1M).
- to meet ongoing operational requirements by having liquidity on demand as well as earning short-term income.

Risk – low ability and tolerance to take risk. For selection, assets will only be considered with banking institutions which have adequate credit quality – at least BBB investment grade credit ratings assessed by Fitch, Moody's or S&P.

Return –to optimise best financial return available whilst ensuring that preservation of capital takes precedence over revenue maximisation

Liquidity - Decisions on how much to invest and how long to invest for, will be based on operational requirements, demonstrated by cash flow forecasts produced by the MAT Finance Director (FD). The cash flow forecasts will take account of the annual budget and spending plans approved by the Board of Trustees and updated on a monthly basis.

Time horizon – 0-12 months

16.1 INVESTMENT STRATEGY

To ensure no drawdown of reserve funds, 100% of assets will be invested in short-term instruments at various financial institutions to provide safety, liquidity and return. To manage the risk of default, deposits should be spread over at least two banking institutions and be subject to a maximum exposure of £500,000 with any Prudential Regulation Authority (PRA) authorised institution by the Bank of England (refer to Financial Conduct Authority (FCA). Whilst this exceeds the protection limit of £85,000 provided by the FCA it is accepted that it is not always practicable to find a sufficient number of investments of this size that meet the prudent criteria outlined in this policy.

A sufficient balance must be held in the current account so that the MAT's financial commitments can always be met without the bank account going overdrawn. The size of the balance will be determined by a forecast of future need and kept under review. Investments for a fixed term should not normally exceed one year in order to provide flexibility for the following year's plans, unless a clear rationale is provided for exceeding one year to the benefit of the MAT.

Assets of the Trust may be invested in the following asset categories:

- a. Cash
- b. Demand or term deposits
- c. Short-term notes with terms to maturity of 0-12 months

MONITORING AND REVIEW PROCESS

Any deposit for investment will need to be approved by the Audit and Risk committee (ARC) and signed by the CEO and a Trustee – the Chair or Vice-chair of Audit and Risk committee, or the Chair of Trustees.

The MAT FD will monitor the cash position and cash flow forecast and report investments held and the performance of investments against objectives to the ARC on a semi-annual basis.

This Investment Policy has been approved by the Trustees on recommendation from ARC. It will be reviewed by ARC on an annual basis to ensure continuing appropriateness.

17. CENTRE FUNDING

TTLT to top slice school income to raise funds to cover Centre costs (for 2022/23, this is 7%).

School DFC balances should not be included when calculating the top slice %.

In the event the Centre Trust remains in deficit at year-end following the 30%/70% distribution (see section 18), the schools will further contribute from their surpluses to extinguish the deficit. This must be agreed at SLT as part of budget monitoring with clear explanations provided of the reasons for the deficit at the earliest opportunity. Each school to contribute towards the centre deficit by reference to pupil numbers.

18. SPLIT OF SCHOOL SURPLUSES

Unrestricted school surpluses to be split 30% to schools and 70% to be held in the Trust centre.

Such surpluses to be calculated with reference to the previous financial year in-year surplus (see example below*).

Such surpluses to be calculated net of any CIF income.

Schools to utilise the 30% retained surpluses with reference to school development plans but not for sustainability. (This amount can be rolled over by schools yearly for larger projects).

Should a school go into deficit in-year, the school would be expected to create a plan to return to a positive balance the following year including paying back any deficit sum.

To ensure that the above is correctly accounted for a journal be passed in the financial accounting system, as soon as is practicable, to recognise the split of surpluses.

**Example surplus split:*

	Total in-yr surplus	30% of In-year surplus	70% of In-year surplus
	31/08/21	31/08/21	31/08/21
	£	£	£
Curwen Primary School	130,040	39,012	91,028
Kensington Primary School	143,676	43,103	100,573
Ranelagh Primary School	112,637	33,791	78,846
North Beckton Primary School	175,367	52,610	122,757
	561,720	168,516	393,204

The utilisation of 70% of surplus funds transferred to the Trust Centre; is decided by SLT, including HTs from all schools and not only by the Trust Centre. Projects may be put forward by individuals or groups and may target individual schools or Trust wide initiatives. Funding proposals must be transparent.

In the first instance, SOTS will consider and evaluate any funding proposals, utilising accumulated Trust Centre monies, supporting school or Trust-wide development plans directly or indirectly using a scoring system.

Such proposals to then be considered by TTLT SLT.

Any agreed proposals are subject to Trustee approval.

Any agreed proposals are not a loan.

It is expected that the school will make every effort to match fund school-specific projects whenever possible.

Where schools have already bid for money, evidence needs to be provided of what it was previously used for and the outcomes and this will be part of the consideration for any future bids.

There will be one funding round per academic year.

Powers & Delegated Functions

Audit & Risk Committee

Remit and Responsibilities

The powers and functions delegated by the Board to the Audit & Risk Committee are as set out below.

External Audit

- To consider the appointment of the external auditor and assess independence of the external auditor, ensuring that key audit personnel are rotated at appropriate intervals.
- To recommend the audit fees to the Board and pre-approve any fees in excess of £10,000 in respect of non-audit services provided by the external auditor and to ensure that the provision of non-audit services does not impair the external auditors' independence or objectivity.
- To oversee the process for selecting the external auditor and make appropriate recommendations through the Board to the members of the Trust to consider at any general meeting where the accounts are laid before members.
- To discuss with the external auditor the nature and scope of each forthcoming audit and to ensure that the external auditor receives the fullest co-operation.
- To review the external auditor's annual management letter and all other reports and recommendations, together with the appropriateness of management's response.
- To review the performance of the external auditor on an annual basis.
- To recommend to the Board the appointment/re-appointment of the external auditor.
- To review and consider the circumstances surrounding any resignation or dismissal of the external auditor.

Internal Audit

- To set and review the internal audit programme and ensure that the internal audit function is adequately resourced and has appropriate standing within the Trust.
- To review the reports and recommendations of the internal audit, together with the appropriateness of management's response.
- To monitor the implementation of action agreed by management in response to reports from the external auditor internal audits.

Financial Management & Policies

12 To keep under review the Trust's financial management and reporting arrangements, providing constructive challenge (where necessary) to the actions and judgements of management in relation to the interim management and financial accounts, statements and reports and the annual accounts and financial statements, prior to submission to the Board, paying particular attention to:

- critical accounting policies and practices, and any changes in them
- decisions requiring a major element of judgement
- the extent to which the financial statements are affected by any unusual or complex transactions in the year and how they are disclosed
- the clarity and transparency of disclosures
- significant adjustments resulting from the audit
- the going concern assumption
- compliance with accounting standards
- compliance with DfE and legal requirements.

13 To review the Trust's policy and procedures for handling allegations from whistle-blowers.

14 To review the Trust's policies and procedures for handling allegations of fraud, bribery and corruption.

15 To receive reports on the outcome of investigations of suspected or alleged impropriety.

16 To review the adequacy of policies for ensuring compliance with relevant regulatory, legal and code of conduct requirements.

17 To ensure that any significant losses are investigated and reported to the DfE/ESFA where required.

18 To review the Trust's risk management policy, strategy, processes and procedures for the identification, assessment, evaluation, management and reporting of risks.

19 To review the adequacy and robustness of risk registers.

20 To keep under review the adequacy and effectiveness of the Trust's governance, risk management and internal control arrangements, as well as its arrangements for securing value for money, through reports and assurances received from management, internal audit, the external auditor and any other relevant independent assurances or reports (e.g. from the National Audit Office).

21 To review all risk and control related disclosure statements, in particular the Trust's annual "Statement on Internal Control", together with any associated reports and opinions from management, the external auditor and Responsible Officer, prior to endorsement by the

Trust Board.

22 To review any recommendations made by the Secretary of State for Education for improving the financial management of the Academies.

General

23 To review or investigate any other matters referred to the Audit & Risk Committee by the Board.

24 To draw any significant recommendations and matters of concern to the attention of the Board.

Finance, Operations and Resources Committee

Remit and Responsibilities

The powers and functions delegated by the Board to the Operations and Resources Committee are as set out below.

Funding

1 To consider each of the Academies indicative funding, notified annually by the DfE/EFSA and to assess its implications for the relevant Academy. This will be in consultation with the Finance Director together with the Head Teacher or Head of School and the Business Manager of the relevant Academy, in advance of the financial year, drawing any matters of significance or concern to the attention of the Board.

2 To consider and recommend acceptance or non-acceptance of the Academies budgets each financial year.

Budgeting

3 To contribute to the formulation of the Academies strategic plans, through the consideration of financial priorities and proposals, in consultation with the relevant the Head Teacher or Head of School and the Business Manager and with the stated and agreed aims and objectives of the relevant Academy.

4 To receive and make recommendations on the broad budget headings and areas of expenditure to be adopted each year. This will include the level and use of any contingency fund or balances, ensuring the compatibility of all such proposals with the development priorities set out in each of the Academies' strategic plans.

5 To liaise with and receive reports from appropriate committees and make recommendations to those committees about the financial aspects of matters being considered by them.

6 To consider the spending plans of other committees and report back and advise the Board.

- 7 To delegate the day to day management of the approved budget to relevant the Head Teacher or Head of School I, within agreed authorisation limits.
- 5 To monitor the effectiveness of the LAB in monitoring the budget.
- 6 To consider requests for supplementary expenditure and make appropriate recommendations to the Board.
- 7 To consider and act upon matters not covered by other sub-committees.
- 8 To review financial policy including consideration of long term planning and resourcing in accordance with each of the Academies' development plans.

Expenditure

- 9 To monitor and review expenditure on a termly basis and ensure compliance with the overall financial plan for the Academies, and with the financial regulations of the Trust, drawing any matters of concern to the attention of the Board.

Financial Procedures

- 10 To monitor and review procedures for ensuring the effective implementation and operation of financial procedures, on a termly basis, including the implementation of bank account arrangements and where appropriate make recommendations for improvement.
- 11 To prepare the financial statement to form part of the annual report of the Board to stakeholders and for filing in accordance with requirements of the Companies Act, Charity Commission and Funding Agreement (including the AFH)

Health & Safety

- 12 To receive each term the relevant Head Teachers or Head of Schools Health and Safety report and advise as necessary.
- 13 To monitor compliance with the Academies' Health & Safety policies and statutory obligations under the Health and Safety at Work Act 1974.

Asset Management

- 14 To receive reports from the relevant Head Teacher or Head of School on the management of assets including premises and their security.
- 15 To confirm that an asset recording system is in place, including an inventory and fixed asset register for each Academy.

Property Management

- 16 To determine the use of the Academies premises and grounds outside Academies sessions with regard to the lettings policy and charging policy.
- 17 To ensure that the Academies premises are inspected on an annual basis and that a

planned and costed statement of priorities is prepared and reviewed.

18 To ensure the responsibilities of the Board under the Environmental Protection Act are met.

19 To advise the Board on environmental issues to ensure the Academies are acting as a responsible institution in its duty to conserve energy, materials and with regard to the local community.

General

20 Reviewing or investigating any other matters referred to the Operations and Resources Committee by the Board.

21 Drawing any significant recommendations and matters of concern to the attention of the Trust Board.

Growth

22 To design and develop growth plans making recommendations to the Board as to the strategic growth and development and to review opportunities for income generation through effective uses of facilities and also personnel to other schools outside of the Trust.

Other responsibilities include:

1 To prepare and submit recommendations for the adoption by the Trust Board of:

- an appraisal [policy/performance management]; and
- a pay policy for the Academies

2 To operate in accordance with the statutory appraisal regulations and the relevant Academy's adopted policy as follows:

- to select an external adviser to advise the Committee undertaking the appraisal of the Head Teacher or Head of School;
- to take advice from the external adviser when agreeing objectives and reviewing the performance
- to agree performance objectives with the;
- to conduct the appraisal;
- to determine whether the outcome of the Principal's appraisal meets the criteria for pay progression as covered under the adopted pay policy;
- to support the with the annual report to the Board on appraisal arrangements and outcomes;
- a panel selected from the Committee to hear any appeal by a teacher against entries made within their appraisal statement. This should be in line with agreed pay policies.

3 To moderate pay decisions across the Academies – NB first appeal should be at LAB level.

4 A panel selected from the Committee to hear any appeal by a teacher employed at any Academy against the outcome of their threshold assessment application.

5 To determine annually, [in accordance with the School Teachers' Pay and Conditions Document] the Appraisal and Pay Policies adopted by the Academy and the Academy's salaries budget, the salaries of teaching staff.

6 To determine annually, in accordance with the adopted Pay Policy and any appropriate regulations and agreements and within the Academies salaries budget, the salaries and gradings of support staff.

7 To deal with any other matters relating to pay, appraisal and employment as may be referred by the Board.

8 Any appeal that has gone to the LAB but remains unresolved will be determined by the Committee.

Grievances

9 To consider staff grievances where there is a referral under the grievance procedure adopted by the Board. A panel comprised of members of the Committee will consider the grievance and seek to resolve the matter following a process and hearing conducted in accordance with the adopted procedure.

10 To receive reports from any formal grievances and outcomes.

Staff Discipline/Dismissals

9 Under the disciplinary or capability procedures for the Head Teacher adopted by the Trust Board, to consider formal action against the Head Teacher and for a panel comprised of members of the Committee to make a determination as provided for under either procedure. The Committee will be responsible for the future review of any sanction short of dismissal as required under the relevant procedure

10 Under the disciplinary or other relevant procedures (e.g. relating to capability, staff reductions or incapability due to ill-health) adopted by the Board, to make any determination that any member of staff employed at an Academy should be dismissed from their post.

11 Before taking any decision on dismissal or give the member of staff concerned an opportunity to make representations on the proposed action and to consider those representations at a formal meeting conducted in accordance with the relevant adopted procedure.

12 Where it is determined that a member of staff should be dismissed, to ensure that the member of staff is notified of the decision, the reason for it and that the member of staff has a right of appeal against the decision.

13 To receive reports on any formal staff disciplinary measure.

Staff Appeals

16 Under the disciplinary procedure or capability procedure adopted by the Board, to consider any appeal against a sanction short of dismissal issued by the Principal or by the staff discipline/dismissal Committee to a member of staff employed at the Academy.

17 Under the disciplinary or other relevant procedures (e.g. relating to capability, redundancy or incapability due to ill health) adopted by the Board, to consider any appeal against a decision of the staff discipline/dismissal Committee to dismiss from their post a member of staff employed at the Academy.

18 To consider appeals under other procedures as may from time to time be delegated by the Trust Board, including appeals under the Academy's adopted Pay Policy.

Personnel

19 To receive reports and make recommendations to the Board on all aspects of matters relating to staff at the Academies.

20 To advise on the strategic planning of human resources.

21 To monitor the communication and consultation of policies and processes to staff and review feedback.

22 To advise and recommend revisions to those policies which affect staff, including but not limited to those which relate to recruitment, retention, record-keeping, induction, training, allegations against staff, equalities, discipline and grievance, professional conduct, professional development, charging and remissions, training, performance management, management of stress, trade unions, whistle-blowing and pay.

23 To advise the Board on the appointment of the relevant Head Teacher.

24 The Board delegate the appointment of supply staff and temporary staff appointed for one term, and non-teaching staff to the relevant The CEO will appoint the Head Teacher and Deputy Head Teacher

25 Non-teaching staff, appointed to support children with special needs, will be appointed in consultation with the Academy SENCO.

Appendix 2 – Whistleblowing Policy

1. Aims

- 1.1 The Fair Funding Regulations require Local Authorities from April 2002 to set out a procedure to be followed by all persons working at a school, including teachers, support workers, agency workers or members of the school's Local Advisory Board (LAB) who wish to complain about financial management or financial probity at the school, and how such complaints should be dealt with.
- 1.2 This school is committed to the highest possible standards of openness, probity and accountability and aims to comply with the requirements of the Public Interest Disclosure Act, 1998.
- 1.3 This Whistleblowing Policy is intended to encourage and enable those covered by the policy to raise serious concerns at an early stage, in the right way and to do so without fear of recrimination, victimisation, discrimination or disadvantage.

2. Scope

- 2.1 The Act provides protection for workers who disclose information which might otherwise be regarded as confidential, if the disclosure falls into one of the categories outlined below:
 - a) A criminal offence has been, is being or is about to be committed.
 - b) The employer has failed, is failing, or is about to fail to comply with his legal obligations.
 - c) A miscarriage of justice has happened, is happening, or is likely to happen.
 - d) An individual's health and safety has been, is likely to be, or is being jeopardised.
 - e) The environment is, has been, or is likely to be, damaged
 - f) Information falling into any of the above categories has been, is being or is likely to be deliberately concealed.
- 2.2 By adopting this policy the school is reassuring the workforce that they can safely raise concerns about malpractice internally. This will enable the school to investigate and deal with such concerns raised and continue to foster a responsible and accountable culture in the organisation.
- 2.3 Staff and members of the LAB are expected to notify the school of any reasonable and genuine concerns they have about an abuse of the school's stated standards, malpractice, theft, fraud, financial abuse, criminal offences, breach of legal obligations, dereliction of the school's health and safety responsibilities, damage to the environment, other unethical conduct or the cover up of any of these.

- 2.4 It is recognised that some cases raised under the Whistleblowing Policy will proceed on a confidential basis. Every effort will be made not to reveal the identity of the individual who raises a concern without their prior consent.
- 2.5 The policy is not designed to replace the Grievance, Disciplinary or Child Protection Procedures. Concerns or allegations that fall within the scope of specific procedures will normally be referred for consideration under those procedures.
- 2.6 The policy is only about employees and members of the LAB, and it is not a replacement for the school's complaints procedures and other statutory reporting procedures that may apply. The Whistleblowing Policy is primarily to protect the interests of others or of the organisation.
- 2.7 It is accepted that there may be occasions when a concern turns out to be unfounded but was raised in good faith. The school will not take action against the individual in these circumstances. If, an allegation was unfounded and it was clear that it had been raised frivolously, maliciously or for personal gain, then that individual may face disciplinary action.
- 2.8 The school is committed to treating claims of impropriety seriously irrespective of who the alleged perpetrators are. In all cases the school will seek the most appropriate sanction against individuals that it considers guilty of malpractice. This includes dismissing employees, taking civil legal action and, in conjunction with the law enforcement agencies, instituting criminal proceedings.
- 2.9 The aim of the Whistleblowing Policy is to enable employees to raise their concerns in-house and to be assured that action will be taken quickly and effectively. It should not be necessary, in most cases, to take concerns outside the school and especially to the media. Staff have a duty of confidentiality towards the school. It is a serious matter to disclose confidential information.

3. **How the school will handle concerns raised**

Step One – how to raise a concern

- 3.1 There are a number of agreed contacts for employees to raise concerns with under the Whistleblowing Policy. This enables the employee to choose the person to whom they wish to make the disclosure.
- 3.2 Employees who have a concern about any wrongdoing should normally raise their concerns with their line manager. If however you feel unable to raise the matter with your line manager, for good reason, you may raise the concern with your Executive Head Teacher or Head of School or another senior member of school staff. If you feel unable to raise your concern with any member of the school management you may raise it with a member of the school's LAB, Local Authority Designated Officer (LADO), your Union representative or the Employee Assistant Helpline.
- 3.3 Concerns may be raised orally or in writing. Make it clear if you want to raise the matter in confidence. The person with whom you raised the concern may have a preliminary meeting with you to discuss the most appropriate route. You may bring a friend/union representative to any meeting that is arranged in connection with the concern you have raised as long as the friend/union representative is not involved in the matter and that the friend agrees to maintain confidentiality.
- 3.4 If you are raising concerns as a member of the school's LAB you should speak to the chair. If you feel unable to raise the matter with them for good reason, you should contact Local Authority Designated Officer (LADO) or the Employee Assistant Helpline with your complaint.
- 3.5 You are not expected to prove beyond doubt the truth of an allegation. However, you will need to demonstrate to the person contacted that there are reasonable grounds for your concern.
- 3.6 The school hopes that this policy gives you the reassurance you would need to raise concerns internally. However, it recognises that there may be circumstances where progressing through the internal route has failed and you can only properly report your concern to external bodies that have responsibilities to monitor the school's compliance to its own standards and legal obligations. In most cases the most appropriate body would be the school's external auditors.

Step Two – What happens once a concern has been raised?

- 3.7 This appointed person, while maintaining the confidentiality of the complainant, will ensure that any individual who is the subject of the allegation is given details of the allegations in order to respond.
- 3.8 Once you have raised your concern, the person receiving the whistleblowing allegation will be responsible for ensuring that it is investigated properly. The nature of the investigation will depend upon the concern raised.
- 3.9 The person receiving your whistleblowing concern is responsible for ensuring you receive feedback on progress, subject to any issues of confidentiality that may be necessary to guarantee a successful conclusion. It may not be possible to inform you of the precise action undertaken where this would infringe a duty of confidence owed by the school to another party.

4. Safeguards

- 4.1 The school recognises that the decision to report a concern can be a difficult one to make. The school will take appropriate action to safeguard you from recrimination or victimisation as a result of raising a genuine concern.
- 4.2 All concerns will be treated in confidence and every effort will be made not to reveal your identity if you so wish. However in some circumstances you may be needed to come forward as witness.
- 4.3 You are encouraged to put your name to your concern wherever possible. Concerns expressed where the complainant wishes to remain anonymous are much less powerful but the school will consider anonymous concerns on a case by case basis.

5. Independent Advice and Helpline

5.1 If you are unsure whether to use the school's Whistleblowing Policy, or you want independent advice at any stage, you may contact the independent charity called Public Concern at Work. This organisation seeks to ensure that concerns about serious malpractice are properly raised and addressed in the workplace. The staff will give you free expert and confidential advice about how to raise a concern about serious malpractice at work using a Whistleblowing Policy. The contact number is:

Protect on 020 3117 2520

- 5.2 The Trade Unions encourage their members to contact them for advice before they take action in accordance with the policy.
- 5.3 The act of seeking confidential advice under 5.1 and 5.2 is solely a matter between the parties concerned and could not of itself be grounds for disciplinary action.

6. Responsible Bodies and Monitoring Arrangements

- 6.1 The Governing Body has overall responsibility for the policy.

- 6.2 The Executive Head Teacher is responsible for the operation of the policy within the school and the overall maintenance of a record of concerns raised in accordance with this policy and the outcomes.
- 6.3 The LA is responsible for the operation of the policy and records outside the school.
- 6.4 All staff will be advised of this policy and where to access it.
- 6.5 This policy was devised in consultation with the Trade Unions and will be reviewed similarly.

Appendix 3

CHARGING POLICY

Introduction

This policy has been formulated in accordance with Department for Education guidance on Charging for Schools.

Aim

The aim of this policy is to set out how charges are applied to parents in relation to school activities, uniform and equipment.

The Tapscott Learning Trust is responsible for determining the content of the policy and the Local Advisory Board (LAB) and Head teacher for each respective academy for implementation of this policy.

The Tapscott Learning Trust recognises the valuable contribution that the wide range of additional activities, including clubs, practical activities, trips and residential experiences can make towards pupils' personal and social education. The trust aims to promote and provide such activities both as part of a broad and balanced curriculum for the pupils of the school and as additional optional activities. We believe that no child should have his/her access to the curriculum limited by charges.

Therefore, pupils will not be charged for activities that support the broad and balanced curriculum provided by each of the schools. The schools, from time to time, will ask parents to make a voluntary contribution to activities or school trips. This will only happen if the school has itself incurred a charge. Pupils will not be discriminated against if they do not contribute. However, if enough contributions are not received, this may result in the activity or trip being cancelled.

Charges

The school will only charge for specific activities. These include:

- Before and after school including clubs (not including Breakfast Club)
- Breakfast Club
- After school care (6o'clock club)
- Fairplay House / residential trips to cover board and lodgings
- Music Tuition
- Breakages
- School Uniform
- Lost or damaged books
- School Meals (Juniors) possible from September

Before and after school including clubs

These are not part of the education provided during school hours. This is part of the extended provision. Schools may need to charge for these provisions and this will be agreed at Local Advisory Board level.

Breakfast Club

Parents are asked to pay a charge per day for breakfast club. The cost of the club will be set by the Local Advisory Board and charges will relate to running costs at said schools.

After school care (6o'clock club)

Schools may run child care clubs as part of their extended provision. The charges related will relate to running and overhead costs and will be set and reviewed by the LAB and reviewed yearly.

Residential

The only charges made to parents are for board and lodgings only. Parents eligible for Free School Meals will have a 50% reduction for Residential trips. The cost for tuition and travel is paid by the school, as this is part of broad and balanced curriculum provided.

Music Tuition

A charge will be made for lessons provided by the Music Academy. This will be paid by parents directly to the Academy and not the school.

Music lessons by ECAM (Every Child a Musician) are free of charge but a deposit may be required for the musical instrument.

Breakages

In cases of wilful or malicious damage to equipment throughout the school, the school will make a charge. Each incident will be dealt with on its own merit and at the discretion of the Executive Headteacher/ Headteacher.

School Uniform

The uniform list provides examples of uniform and colours for the school. Items with school logo are sold at school or agreed distribution. A list of items and prices is available at the school office and also in the School Prospectus. All other items and non-logo uniform can be purchased outside school if parents wish in order for parents to obtain best value. The school will supply essential protective clothing when necessary e.g. safety goggles.

Lost and Damaged Books

If a child has lost a reading or library book then parents will be asked to make a contribution of £3.50 or £5.00 towards replacement depending on the original cost of the book. If a book has been damaged we will endeavour to repair it. However, if it is not repairable then a contribution will also be asked for.

Additional Support

The school may be able to offer additional financial support for parents/families that find it hard to meet the cost of additional activities. This will be dealt with in confidence, case by case. If you require additional support parents need to meet with the Executive Headteacher/Head of School who will consider the needs presented.

Publication of Information

This policy can be found on the Trust's and schools website and hard copies are available from Main Reception for parents to view.

Review and amendments

This policy will be reviewed annually by the Trust Operations and Finance, Operations and Resources committee who may, from time to time recommend amendments to the categories for which a charge maybe made. Any changes will be brought to the full Board of trustees. However, TTLT reserve the right to review the Charging Policy when necessary.

Lettings Policy

Each of the Trusts schools has a **lettings policy** which must be applied.

Appendix 4

Procurement limits

a) Multi Academy Trust (MAT) LEVEL AUTHORITY

Value	Procedure	Post holder with appropriate delegated authority
In line with budgeted posts.	Approving new staff appointments within the authorised establishment that reflect agreed staffing structure, except for any senior staff posts which the TTLT Trustees have agreed	CEO
Up to £10,000	2 quotes, in line with required services, and Service Level Agreement(SLA) to be agreed	CEO, Finance director (FD)
Authorising contracts up to £29,999	3 written competitive quotes, and contract or SLA to be agreed in line with required and contracted services	FD & CEO
£30,000 to £79,999	3 written quotes with comparison to Key requirements and KPIs	CEO and/or FD and advise to Finance, Resources and Operations committee (FOR)
£80,000 to £213,477	Full tender 3 stage tender Full advertised competitive process	Project team reporting to agree and report to Finance, Operations and Resources Committee
*Above £213,477 and European rules apply	Full EU advertised competitive tender process 3 tenders	Project team reporting to Trust Board; at least 1 Trustee on project team.
*Above £213,477	Full tender 3 stage tender Full advertised competitive process	Project team reporting to Trust Board; at least 1 Trustee on project team.
	*Following the end of the Transitional Period with the EU on 1 st January 2021, all UK contracting authorities must register with the Find a Tender Service (FTS), the new UK e-notification service, where notices for new procurements are required to be published, in	

	most cases, in place of the Official Journal of the European Union's/Tenders Electronic Daily (OJEU/TED)	
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b) Individual Academy Levels

Value	Procedure	Post holder with appropriate delegated authority
In line with budgeted posts.	Approving new staff appointments within the authorised establishment that reflect agreed staffing structure, including senior staff posts which LAB have agreed should be approved by them and CEO	Head Teacher
Up to £10,000	One quote or approved supplier	Head Teacher/FD
£10,000- £15,000	Two quote or approved supplier	Head Teacher/FD , advise LABs as part of Management Accounts
£15,001- £29,999	3 written quotes	Head Teacher and advise Local Advisory Board (LAB)
£30,000 - £79,999	3 written quotes with comparison to Key requirements and KPIs	CEO, HT, advise to LAB and FOR
£80,000 - £213,477	2 Stage Full tender	Project Team agree and report to LAB and Finance, Operations and Resources Committee.
*>£213,477	Full EU advertised competitive tender process 3 tenders	Project team reporting to Trust Board; at least 1 Trustee and 1 LAB member on project team.

c) LIMITS OF DELEGATION

MAT Finances - Virements

Level of Virements	Post holder with delegated authority
Up to £15,000	FD
£ 15,001 to £30,000	CEO
£30,001 and £50,00	CEO and FD; notified to the Finance, Operations & Resources (FOR) committee

£50,001 and above	CEO and FD, notified to Finance, Operations & Resource (FOR) and Chair.
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Academy Virements – School level

Level of Virements	Post holder with delegated authority
Up to £15,000	Head Teacher (HT)
£ 15,001 to £50,000	HT and approved by LAB

Appendix 5



TAPSCOTT Trust Declaration of Gifts and Hospitality Form

Receiving benefits, gifts, rewards or hospitality in return for providing services (even if these services are part of a usual role) can be perceived as an inducement to show favour to a person or organisation in his or her official capacity. Staff are advised to decline such offers, but it is acknowledged that there may be occasions when this is not feasible.

If you have received a gift or hospitality please complete the form and return to the School Business Manager or Company Secretary.

Details of employee receiving gift or hospitality

Full Name	
Job Title	
School/Trust	
Date of Declaration	

Description of gift or hospitality

Description of gift / hospitality	
Value/estimated value of gift / hospitality	
Purpose of the offer	
Person/organisation providing the gift or hospitality	
Relationship to the person/organisation offering the gift or hospitality	
Acceptance of gift / hospitality	Yes / No

Gift/Hospitality form received/noted by

Signature	
Date	
Name	
Job Title	