



Preston Primary Academy Trust Finance Policy

Incorporating the Financial Scheme of Delegation, Accounting Policy
and Competitive Tendering Policy
and including
Directors and Governors Expenses Policy and Anti-Fraud Policy and Response Plan

**Approved by the Board of Directors
Preston Primary Academy Trust**

Chair of Directors – L Orton

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Proposed Date of Future Review: January 2028

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INTRODUCTION

The Finance Policy has been adapted to reflect the individual needs of Preston Primary Academy Trust and includes specific information relating to procedures and tasks performed in each school within the Trust.

The Finance Policy is a working document and will be updated to meet any changes, such as staff changes.

The policy will be approved by the Board of Directors and will be reviewed **at least** every two years. Both the approval of the Finance Policy and the date of the future review will be recorded in the Minutes of the Board of Directors Meeting.

The Finance Policy is used in conjunction with:

The Academy Trust Handbook

The Academy Trust Handbook sets out the duties and obligations of Academy Trusts which have a funding agreement with the Secretary of State for Education. The Handbook, together with the funding agreement describes the financial relationship between the DfE and Academy Trusts.

Approved Scheme of Delegation

Section 1 should be read in conjunction with the following document:

PRESTON PRIMARY ACADEMY TRUST – SCHEME OF DELEGATION
Adopted by resolution of the Board on 16th July 2025 and reviewed annually

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SECTION 1 - ORGANISATION AND ACCOUNTABILITY

Responsibilities of the Board of Directors/Company Directors

- It is expected that each member of the Board of Directors will have completed an induction course and be aware of policies for schools and the [Academy Trust Governance Guide](#).
- Responsible for the wellbeing and control of staff.
- Responsible for security, custody, and control of resources of the school (plant, buildings, materials, cash, stocks).
- Must comply with responsibility in relation to Health and Safety.
- Responsible for ensuring the Trust's funds are used only in accordance with the law, their powers as set out in the Funding Agreement (including the Trust's articles of association) and the Academy Trust Handbook.
- May incur expenditure up to the total of the budget share of the Academy Trust after allowing for the carry forward.

- Ensuring that adequate financial procedures and controls exist to minimise the risk of loss, wastage, or misappropriation and also to satisfy official requirements relating to Income Tax, NI, VAT, Construction Industry Tax etc.
- Directors may delegate any of these powers to a committee or to the Chief Executive Officer (CEO)/Headteacher.
- Directors have the power to limit the delegated powers of the Headteacher if it is considered to be necessary.
- Register of Business Interests is reviewed annually to ensure it is up to date. This is a standing agenda item for LGB's and Board meetings. A Director must withdraw from meetings where he or she or any member of their immediate family has a financial interest in any matter under consideration.
- Responsible for agreeing capitalisation and depreciation policies.
- Formally approve Individual School budget plans and the overall Academy Trust budget, considering such things as current spending, priorities in School Development Plans (SDP), future commitments, pupil numbers etc. and ensure the Budget Forecast Return is submitted to the DFE within the required timescale.
- Approving at least three authorised signatories to cover for absence. A Director can only sign as a second signatory.
- Ensuring that an up-to-date inventory is maintained for items with a replacement cost of £500 or more and an expected life of at least one year. Ensuring that the inventory is checked against the items at least annually. Discrepancies are reported to Directors to investigate and keep a record of write-offs.
- Appointing a Chief Executive Officer (who is also the Accounting Officer) a Clerk and a Chief Finance Officer in accordance with the Academy Trust Handbook. (In PPAT the Chief Finance Office is also the Chief Operations Officer).
- Being aware of their statutory duties as Company Directors and Charitable Directors and in doing so adhere to company and charity law.
- Ensure value for money
- Approving the write-off of debts.
- Meet at least once a term and only conduct business if quorate

Responsibilities of the Finance, Audit and Risk Committee

Every Academy Trust should have a Finance Committee, in PPAT the Finance Committee is a combined Finance, Audit and Risk committee. The Board of Directors has delegated to the Finance, Audit and Risk the following responsibilities:

- The drafting and recommendation to the Board of Directors of the annual budget.
- The monitoring of the budget, expenditure, and income.
- Ensuring expenditure does not exceed the available budget.

- Authorising, in advance, virements exceeding **£10,000**, or figure agreed by Board of Directors. (See [Section 3 - Virements](#))
- Authorising expenditure not covered by the cost centre headings in the original agreed budget or incurred due to a change in policy and authorising the funding source for such expenditure.
- Approving high level purchases and contracts prior to an order being placed.
- Ensuring that monthly management reports (including balance sheet, income & expenditure, cashflow and carry forward) are delivered monthly to all Directors, not just the Chair and FAR committee.
- Maintaining a Charging and Remissions Policy for School Activities.
- Maintaining a Lettings Policy.
- Writing off bad debt subject to paragraphs 5.18 to 5.21 of the Academy Trust Handbook.
- Maintaining a Tendering Policy.
- Reviewing the Risk Register and approving Capitalisation and Depreciation Policies.
- Agree costings for the 1 Year Trust Development Plan.
- Appointing a Responsible Officer for liaison with the company contracted to provide internal scrutiny

Responsibilities of the Accounting Officer (Chief Executive Officer CEO)

The Board of Directors has delegated the following responsibilities to the CEO:

- Leading and managing staff to secure improvement.
- The efficient and effective deployment of staff and resources.
- Ensuring that 4–11 years funding received is utilised for the provision of education to children as per our Master Funding Agreement
- Ensuring that the Trust's 2-4 years provisions (nurseries and pre-schools) are adequately resourced.
- Accountability to Directors and others, such as parents, pupils, staff, and the local community.
- Ensuring all reasonable action is taken to minimise risks.
- Preparing estimates of expenditure and income covering the next financial year for consideration and approval by the Board of Directors.
- Ensuring that monthly Bank and Payroll Reconciliations are carried out as at last working day of the month.
- Submitting a written report to Directors or Finance Committee at least termly on the progress of the budget, explaining variations from expected spend/income and advising on the likely final position.
- Authorising virements below a level of **£10,000**, or a figure agreed by the Board of Directors in advance. (See [Section 3 - Virements](#))

- Reporting virements and journals to the Board of Directors for their approval.
- Responsibility for the identification of all income due, its prompt collection and banking, and the maintenance of complete and accurate records.
- Responsibility for ensuring that Value Added Tax (VAT) is treated correctly on all transactions. Also ensures that the Academy Trust complies with VAT and other tax regulations and that all relevant finance and administrative staff are aware of them. Submitting timely VAT returns to HMRC (HM Revenue & Customs) to ensure VAT is reclaimed.
- Notifying Payroll provider (currently Somerset County Council HR Admin and Payroll) as soon as possible of all matters affecting staff payments.
- Authorising in advance any staff changes or additional paid hours to be worked by staff.
- Responsibility for controlling access to all data in the school in accordance with the Data Protection Guidelines and Codes of Practice.

Responsibilities of the Headteacher, Deputy Headteacher or Senior Teacher

- Signing of official orders – if within budget
- Ensuring that HR Admin and Payroll are notified as soon as possible of all matters affecting staff payments.
- Authorisation in advance of any staff changes or additional paid hours to be worked by staff.
- In the absence of the Headteacher, undertakes the responsibilities of the Headteacher and ensures that an authorised person other than themselves signs orders.

Responsibilities of the Chief Finance and Operations Officer (CFO)

- Preparation of Individual school budgets and the overall Academy Trust budget, setting expenditure thresholds and profiles.
- Ensuring that on receipt of approved order requisition forms, orders are processed for all planned expenditure except for supplies of public utility services.
- Ensuring outstanding orders are reviewed regularly, cancelling, or following up, as necessary.
- Ensuring goods and services received are checked against delivery notes, orders and invoices and ensuring the school is charged only for goods received.

- Ensuring invoices are processed in a timely manner to ensure 30-day creditor terms are adhered to.
- Ensuring processes are in place for the collection and recording of income due/received. Ensuring all income due is received, recorded and that the income is banked.
- Pursuing bad debts and recovering wherever possible.
- Monitoring both individual school budgets and the overall Academy Trust budget, providing information and/or financial reports for the CEO, Headteacher, Directors) DfE and budget holders as required.
- Ensuring that Bank and Payroll reconciliations are processed monthly.
- Ensuring that the Academy payroll provider is provided with staff contract changes and payroll forms to ensure that contract amendments and additional staff payments are made promptly,
- Providing financial information as required by the-DfE.
- Carrying out end of year procedures in accordance with the timetable issued by the DfE.
- Preparation of the Annual Accounts and liaising with appointed auditors to ensure timely submission of Annual Account Return to the DfE.
- Ensuring an up-to-date inventory of school equipment is maintained in each school.
- Ensuring adequate back-ups are maintained of computer-based information.

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SECTION 2 - INTERNAL FINANCIAL CONTROLS

Division of Duties

Division of Duties is the involvement of more than one member of staff in the undertaking of financial tasks. This ensures that one person is not solely responsible for any given function and helps protect against possible error/fraud and provides cover for staff absence.

Below is an example of how the division of duties can work in practice to minimise the risks involved:

- (1) Individual staff complete a requisition form for goods and services required.
- (2) Head signs the requisition form, with the appropriate cost centre identified.
- (3) Using the requisition form, the School Finance Officer prepares orders on the SIMS FMS, having checked with the Trust Finance Manager that the goods/services required are within the budget plan and there are sufficient funds in the cost centre.
- (4) Deputy Head checks the official order against the requisition form before signing the order as correct.

- (5) Upon receipt of goods, the person who completed the requisition form checks the delivery note, to ensure that the goods listed have been "received" and back to the order to see if any items are outstanding. Checks are evidenced in writing and the delivery note is then passed to the School Finance Officer.
- (6) When the invoice is received the School Finance Officer checks the invoice against the delivery note/order to check its validity for payment, then passes to the Headteacher to sign giving approval to process for payment.
- (7) School Finance Officer processes the invoice against the original order on SIMS FMS and creates a BACs payment run.
- (8) Headteacher/ Deputy Head approves the BACs payment run and a Trust Finance Officer checks invoices and BACs before acting as second approver for the payments.

No alterations are made to any invoices. If a change is required, the School Finance Officer requests an amended invoice from the supplier.

Refer to [Appendix 3](#) which details Division of Duties for processes i.e. ordering, invoicing and petty cash including cover for absences. In the school all transactions are traceable through the system from start to finish.

Authorised Signatories

Authorised signatories have been agreed by Directors see [Appendix 4](#) and [5](#). A list of personnel authorised to sign orders, invoices, cheques, etc. is detailed in the minutes of the Board meeting at which they were agreed.

Reconciliation

Payroll reconciliations are carried out by the Trust Finance Officer and reviewed by the Trust Finance Manager monthly around the first working day of the month.

Bank reconciliations are carried out by a Trust Finance Officer and reviewed by the Trust Finance Manager or Assistant Trust Finance Manager monthly around the first working day of the month.

Retention of Records

- Financial and Personnel information needs to be retained for Inland Revenue and HM Revenue and Customs purposes. See [Appendix 2](#) for details. Documents are archived annually by the School Finance Officer.
- A written log of any instances of fraud, theft **or incidents/irregularities** detected in the last 12 months, **must be kept** at school and central team level (and reported to Trust Finance Manager) to identify patterns of misconduct and any weaknesses in the current arrangements which need to be addressed.

Audit Requirements

Audited accounts must be produced each year by statutory auditors who are registered under the requirements of the Companies Act. The audit contract must be in writing in the form of a letter of engagement.

Albert Goodman LLP are appointed as auditors for the Academy Trust as agreed by Directors and documented in the appropriate minutes.

In managing the risks to internal financial controls, the Trust Board has appointed Mr Peter Stange to liaise with the company conducting the internal scrutiny and audit.

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SECTION 3 - BUDGETING/FINANCIAL MANAGEMENT AND PLANNING

Funding

The majority of the funds received by the Academy Trust are from the DfE in line with the General Annual Grant (GAG) Statements. Payments are received monthly via BACs payments into individual school Bank Accounts. Additional allocations or deductions may be made throughout the year. Individually Assigned Resources payments are made monthly from the LA (Local Authority) as per the schedule notified in April each year. The Academy also has the opportunity to raise additional funds (income) e.g. via lettings or PTA organised events.

Preparation of the Trust and School Budgets

Priorities within the School or Trust Development Plan (S/TDP) contain financial estimates and form the driving force of the budget with an emphasis on Best Value.

The budgets are prepared by the CEO and CFO
, in the case of schools' budgets, following liaison with the Headteachers.

Initially, budgets will be considered by the Finance, Audit and Risk Committee but must be approved by the Board of Directors. The approval must be minuted.

Budget Monitoring and Reporting

A balanced budget must be approved for the financial year (September – August) both at individual school level and at Academy Trust level. This can use unspent school funds from previous years (carry forward) or be supported by Trust Level reserves.

The Academy Trust must submit a copy of the final budget in the form of the Budget Return Forecast to the DfE by the date specified by the DfE.

Regular monitoring of income and expenditure against the agreed budget is central to effective financial management.

After the monthly reconciliations are completed, budget monitoring reports detailing income and expenditure are produced for the CEO, for Headteachers and all Directors.

The CFO analyses the monthly report to identify any variances/unexpected expenditure and takes appropriate action. Monthly management reports are issued to Directors.

The budget monitoring report is presented to the Finance, Audit and Risk Committee at each meeting. The report includes explanatory notes, details of budget movements, estimated outturn at the end of the financial year from month nine and any remedial action taken/required, or items requiring further discussion/approval.

Carry forwards at the end of year will be discussed with the Finance, Audit and Risk Committee to decide how any uncommitted money will be spent.

Virements (Budget Movements)

The Board of Directors has agreed that budget virements of up to **£10,000** can be actioned, without its prior approval to allow some flexibility within the everyday running of the school.

All budget virements are recorded on a virements form by the CFO and authorised by the CEO in advance of being actioned on SIMS FMS. They are reported to the Board of Directors at the next available opportunity.

Significant changes to budget plans must also be notified to the-DfE.

Any internal journals (transfer of income or expenditure between Cost Centres or Schools) for significant amounts are authorised by the CFO or CEO. They are reported to the Board of Directors at the next available opportunity.

Prepayment/Accrual end of year journals will be provided to the Directors with the Month 12 monthly management accounts.

Forward Financial Planning

In light of estimated or known pupil changes, forward budget plans are projected and considered by the Board of Directors.

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SECTION 4 - PURCHASING

When placing an order, value for money must be considered.

Prior approval is required from the CFO or CEO for individual purchases and any expenditure that exceeds £1,000 in value.

Three quotations are required for individual purchases and services exceeding £5,000 in value and reviewed by the CFO. If the lowest quote is not accepted, the reasons are reported to the Trust Finance Committee and recorded in the minutes of the meeting.

Approval is required from the Finance, Audit and Risk Committee for orders of an individual item exceeding £10,000 and this should be recorded in the minutes of the meeting.

Where the Academy is engaging in works such as building or decorating where Construction Industry Tax (CIT) applies, the CFO ensures that the supplier is registered under the scheme before accepting them to carry out the work.

Where the Academy enters into a contract for the supply of goods or services which involves total payments* of £10,000 or more, at least three written quotes or tenders are sought.

Where tenders are sought, the criteria used in the selection of the successful tender are established prior to advertising or receiving tenders. A record is kept of how and from whom, tenders are sought, what tenders are received, who the successful tender is and the reason for not accepting the lowest tender. A Contracts Register is maintained for this purpose. Contracts are only entered into after ensuring best value principles have been followed.

All contracts over a value* of £100,000 are advertised to ensure open and competitive public procurement in line with Find a Tender (FTS), any new procurement above the public procurement threshold must be published on the UK e-notification service, Find a Tender (FTS): <https://www.find-tender.service.gov.uk>

* The value of a contract is calculated as the annual value multiplied by the number of year's duration.

Please see section 10 – Personnel/Payroll/Recruitment in relation to in year recruitment / staff contract amendments with a cost including oncosts of £1k+

Contracts

Copies of all contracts entered into are retained by the school to enable compliance with terms and conditions to be monitored.

Any contracts must comply with the Local Governments Acts, Public Contract Regulations 2015 and other legislation governing the expenditure of public funds.

Different processes are required for different types of contracts and for different values.

1. BEST VALUE FOR MONEY PROCESS:

Officers will be required to demonstrate that they have secured best value with a minimum of one written quotation by a supplier.

2. THREE QUOTE PROCESS:

- Details of three prospective suppliers and selection criteria
- Details of the pre-determined award criteria
- At least **three** competitive quotes and supporting documentation

3. TENDER PROCESS:

- **Two tender processes are in place for either up to Public Procurement Threshold or over Public Procurement Threshold**
- Where tenders are sought, the criteria to be used in the selection of the successful tender are established **prior** to advertising or receiving tenders. The Board of Directors takes responsibility for the safe receipt, storage and opening of tenders where necessary.
- A record is kept of how and from whom tenders are sought, what tenders are received, who the successful tender is and the reason for not accepting the lowest tender. A Contracts Register is maintained for this purpose.

For **all** purchases **up to £50,000** in value the **BEST VALUE FOR MONEY PROCESS or THREE QUOTES PROCESS** is to be used.

NB: Evidence to be retained by the Trust for audit purposes.

Contracts for Goods and Services

- For contracts between **£50,000 and £100,000** in value the **THREE QUOTE PROCESS** is used.
- For contracts from **£100,000 up to the Public Procurement Threshold** the **TENDER PROCESS** must follow the principles of Public Contract Regulations (Equal Treatment, Non-Discrimination, Transparency, Proportionality and Mutual Recognition).
- For contracts over the Public Procurement Threshold the Tender must comply with the requirements of the Procurement Act 2023

Contracts for Works

- Contracts between **£50,000 and £250,000** in value the **THREE QUOTE PROCESS** is used.
- Contracts from **£250,000 up to the Public Procurement Threshold** the **TENDER PROCESS** must follow the principles of Public
- Contracts over the Public Procurement Threshold the Tender must comply with the requirements of the Procurement Act 2023

Requisition and Ordering

Requisition forms must be completed by staff for all purchases, this must be signed and dated by the Headteacher, or in the case of the central team, the CFO, who ensures that the expenditure has been included in the budget plan and that there are adequate funds to make the purchase.

Alcohol must not be purchased using school or Trust funds.

Gifts for staff must not be purchased using school or Trust funds

Order forms relating to orders placed by the Headteacher must be signed by the CFO/Trust Finance Manager.

On receipt of approved order requisition forms, orders are processed on SIMS FMS for all planned expenditure except for supplies of public utility services.

All official orders are printed on headed paper with Terms and Conditions on the reverse, signed by the Headteacher or another authorised signatory taking account of division of duties.

The authorised signatories are: See [Appendix 4](#)

Outstanding orders are reviewed regularly, cancelled, or followed up, as necessary. If cancelled, a reason is written on the copy order for audit purposes.

Orders are not raised on behalf of, or for the benefit of, private individuals or organisations.

Where telephone orders are placed it is made clear that it is subject to the Academies terms and conditions and written details are supplied immediately to the School Finance Officer to enable a confirmation order to be raised on SIMS FMS and sent to the supplier.

The Academy Trust's conditions of contract are detailed on the back of all official order stationery.

Small items may be purchased directly by classroom/premises staff up to a maximum of £50, where it is appropriate to do so and only after completed, signed purchased requisition is in place. Following the purchase, the receipt must be attached to the purchase requisition and handed to the School Finance Officer for processing. This is then reimbursed via the BACS payment process.

Small items may be purchased directly by central team staff up to a maximum of £50, where it is appropriate to do so and only after completed, signed purchased requisition is in place. Following the purchase, the receipt must be attached to the purchase requisition and handed to a Trust Finance Officer for processing. This is then reimbursed via the BACS payment process.

Delivery Notes

All delivery notes must be date stamped and checked upon receipt of goods, to ensure that the goods listed have been "received." These checks are evidenced in writing by way of a tick against each line item and signature on all delivery notes. Delivery notes are then attached to the order paperwork. Delivery notes are also checked against the order paperwork; any discrepancies are followed up with the supplier by the School Finance Officer.

The inventory register is updated for items of furniture, equipment etc. of **£500** or more.

Payment of Invoices

Where goods are provided by a supplier who is registered for VAT, a valid VAT invoice is obtained.

Payments to individuals (other than some contractors subject to Construction Industry Tax) who supply goods or services to the school (e.g. tuition, performances etc.) are made via the payroll system.

Trust and School Finance Officers should carry out anti-fraud checks prior to adding a supplier to SIMS FMS. When a new supplier is used, or a current supplier submits updated bank details the Trust/School Finance Officer should carry out the following checks:

- Call the supplier directly to confirm the new/updated details with them
- If a letter is received do not use the contact details on the letter, use contact details previously used in FMS or google the supplier details to ensure the latest information is being used.
- Ask the supplier to provide you with their bank details either over the phone or via email, do not read details to them

The Trust/School Finance Officer checks the delivery note to the invoice, to ensure that the school is only charged for goods received. Payments are not made from statements or "brought forward balances."

The invoice is then passed to the Headteacher or if appropriate, the CFO, for signature and authorisation to pay prior to the Finance Officer processing a BACS run on SIMS FMS and the bank (first approver). All BACS runs are sent to the Trust Finance Officer who checks to confirm the process has been completed correctly before approving the BACS payment in the bank (second approver).

Invoices should be filed together with BACS Run Report upon completion of the BACS Payment process.

BACS Payments

Once the Headteacher has authorised invoices for payment the School Finance Officer will create a BACS run in SIMS FMS.

The Headteacher/Deputy Headteacher approves the BACS file prior to the School Finance Officer importing it to Lloyds Commercial Banking Online.

The School Finance Officer imports the authorised BACS file to Lloyds Commercial Banking Online and is first Approver of the BACS file in Lloydslink.

The Trust Finance Officer then checks the BACS file along with invoices and acts as second Approver in Lloyds Commercial Banking Online and submits BACS runs for payment.

Expenses

Staff may claim mileage for travel in their own vehicle when on work related business, which is outside of their usual travel to and from their designated place of work. This is payable at the standard Somerset Council rate. Claims are made by completing an expenses claim form which must be signed by the Headteacher or for central team members, the CFO, and submitted for payment along with a recent fuel receipt. Parking costs may also be claimed if there is no option to park free of charge, receipts must be retained to support such claims. All other expense claims are reimbursed via the BACS run process. Staff must ensure that their own vehicle is insured to use for occasional business use. Staff should supply a copy of their car insurance certificate to the school. Mileage payments cover any general or mileage-related expenses in relation to the car itself, such as fuel, servicing, tyres, road fund licence, insurance and depreciation, plus interest on any loan to buy the vehicle.

Credit Cards

Each school has at least one credit card holder, being either the Headteacher, School Finance Officer, or in some schools, both. The CFO, Trust Finance Manager, Trust People Lead and Catering Manager for Preston, Kingfisher and Manor Court also hold credit cards. Suitable limits are set in line with legitimate school business needs and are reviewed regularly. Card limits are up to £2,500 per card. Card limits may be temporarily increased for short periods of time to cover extraordinary

purchases. The limits will revert to the £2,500 or below on completion and payment of the extraordinary purchases. All cards are held about their person or in the school's safe.

If the card holder leaves the employment of the Academy the card must be destroyed with effect from the termination date of employment and Lloyds Bank notified of such.

Purchases are only made for authorised goods or services on behalf of the school or trust by the credit card holders, CFO or Trust Finance Manager. All staff cardholders must be made aware of the guidance for correct usage of the Academy charge card as issued by with Lloyds TSB on issue of their credit cards.

The school ensures that division of duties is adhered to, and that expenditure is authorised by an appropriate person.

All credit card purchases are requested via a requisition form which must be completed by staff and signed by the Headteacher prior to purchases being made. The School Finance Officer processes the approved requisition forms by purchasing the goods/service, receipts must be retained and attached to the Purchase Requisition form.

Each purchase is recorded on the Credit Card Control Sheet by the School Finance Officer to monitor the credit card balance. This is signed by the Headteacher and sent to the Trust Finance Officer for review monthly.

The Credit Card Control Sheet is reviewed by a Trust Finance Officer and any queries are passed to the Trust Finance Manager to address with the School Finance Officer.

Upon receipt of the Credit Card Statement the School Finance Officer checks the statement against the Credit Card Control Sheet and requisition forms (along with appropriate receipts), passes the statement to the Headteacher for approval by way of a signature and date and then enters all transactions on SIMS FMS.

Leasing

There are two distinct types of lease; finance leases (which are a form of borrowing) and operating leases (which do not involve borrowing). Both are now permitted under the Academy Trust Handbook

Prior written approval must be obtained from the Secretary of State before the Academy takes up a finance lease which is not on the DfE approved list [Changes to leasing agreements for academy trusts - GOV.UK](#)

Prior written approval must be obtained from the Secretary of State before the Academy takes up a leasehold, or tenancy agreement.

All leases must be disclosed in the annual accounts.

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SECTION 5 - INCOME

Income can be vulnerable, and the income collection system should meet the following objectives:

- All income due to the school is identified and collected via the school's online payment system ParentPay wherever possible.
- Lloyds card readers are also an acceptable method of collecting school income
- All income is receipted and banked promptly and completely.
- There is a clearly documented audit trail from receipt through to banking for all transactions.

The school has a Charging for School Activities Policy (Separate document) and a Lettings Policy in place (See [Appendices 6.1](#), [6.2](#), and [6.3](#)). These are adhered to at all times.

Adequate division of duties reduces the risk of error and fraud in dealing with income. The person collecting income is different from the person that records and banks the income. (The Division of Duties is listed in [Appendix 3](#).)

Income from Sales on eBay

Schools may auction items on eBay. However, they must adhere to the following advice:

- the school should risk assess the sale of all items, for example by making sure they are in good working order, with particular attention to electrical appliances.
- Schools are covered for liability under the Products Liability part of RPA insurance. The insurance **does not cover** the cost to the school of refunding the transaction itself, i.e. reimbursing the purchase for a faulty item and postage and packaging, etc.
- The school should be aware of eBay's terms of use, particularly the Compensation clause in force at time of use. (Please note Terms and Conditions are subject to changes and updates from time to time)

Raising Invoices

An account is raised by the School Finance Officer within one week of delivering the goods/service ensuring the invoice complies with the requirements for a tax invoice and is sent to the customer for goods and services provided.

The Academy Trust credit terms are payment in 30 days and are detailed at the bottom of each invoice.

Collection and Banking of Income

The Trust aims to be as cashless as possible, however there will be occasions where cash is received in schools.

This comprises several stages:

(i) Cash Handling

Cash Handling guidance.

At all times:

- Do not count cash where the public/visitors can see.
- Prior to banking, keep cash and cheques locked away securely in the safe, out of site of the public/visitors.
- Bank income regularly, so that a minimal amount is kept on the school premises and so that a large amount of cash does not have to be carried to the bank.

(ii) Recording

All income received by staff in the school Office is recorded on record/monitoring sheets. Income is recorded on SIMS FMS promptly ensuring the correct VAT treatment is applied, and the authorisation slip is printed.

Bank paying in slips are completed in full.

ParentPay – Income received via ParentPay is allocated to the correct Cost Centre by the School Finance Officer.

(iii) Reconciliation

Reconciliation of income is carried out monthly by the School Finance Officer, ensuring that all income banked has been received.

Independent checks are made by the Trust Finance Manager to ensure that all income expected has been recorded, banked, and received.

Debts Policy

Bad debts are pursued by the School Finance Officer and money recovered wherever possible or escalated to the Trust Finance Manager.

- Invoices for services (ASC / BFC / Nursery / School Meals / Trips / Activities etc) should be raised in a timely manner
- Outstanding invoices should be checked on a fortnightly basis
- Any outstanding invoices over 1 month should be discussed with the debtor to ensure prompt payment of the outstanding balance, or to implement a payment plan.
- Outstanding balances over 1 month and discussions with debtors should be reported to the Headteacher and Central team.

Where money is not recovered, the matter is referred to the Finance, Audit and Risk Committee, who may write off the debt in line with the write-offs and liabilities procedure set out in the Academy Trust Handbook 5.18 to 5.21.

The Academy trust will maintain a record of all debts written off showing what attempted recovery action has been taken and the justification for non-recovery.

Gift Aid

Directors are aware of the Gift Aid scheme available for charitable donations from individuals who have paid Income Tax or Capital Gains Tax in the relevant tax year.

SECTION 6 – BANKING ARRANGEMENTS

The Academy Trust and each individual school within the Trust holds its own bank account with Lloyds TSB. The CEO and CFO approve the opening of bank accounts. All transactions relating to the Academy Trust and individual school accounts are operated through these accounts.

The Academy trust and each individual school within the Trust may hold, if appropriate, its own high interest Account with Lloyds TSB. The CEO and CFO approve the opening of these bank accounts. All transactions relating to the Academy Trust and individual school accounts are operated through these accounts.

For all authorised signatories, see [Appendix 4](#).

SECTION 7 - ASSETS

The Academy Trust has many valuable items in use throughout the sites. Some of these items are fixed, but many are portable and therefore may be vulnerable to theft.

Inventory

All items purchased above **£500** (together with attractive and portable items under £500 e.g. ICT equipment/digital cameras) are recorded in the school inventory upon receipt, giving full details of:

- Value
- Date purchased
- Description
- Serial numbers (where applicable)
- Security label number
- Useful life
- Location within school

The Inventory is checked annually against the asset register by the Headteacher with any discrepancies being investigated.

Where items are not permanently allocated to an individual a booking out system is employed where any goods are taken off site. The system includes the following details:

- Name of borrower
- Item borrowed
- Date borrowed
- Condition of goods when removed
- Date returned
- Condition of goods when returned

A record is maintained of all disposals, including the proceeds of the sale, the date of transaction and the name and address of the purchaser.

Cash

Cash is kept in a locked safe when not in use. Schools should be cashless wherever possible, and must not hold cash for any third parties i.e. PTA's etc
Should any cash be collected, it should be recorded and banked as soon as possible to ensure no cash is held on the premises.

Stock

All consumable stock is stored centrally in the stock room. This is locked at all times to avoid the misuse of stock which leads to unnecessary ordering.

A physical check is carried out annually to ensure that stock is kept at a reasonable level.

Fixed Assets

Individual assets over £5000 are capitalised in line with the Capitalisation policy and entered in Fixed Asset Register. Any group of items which relate specifically to one project and cost over £10,000 will be capitalised in line with the Capitalisation policy and entered in Fixed Asset Register.

This includes Land and Buildings, Plant and Machinery, Furniture Fixtures and Fittings, ICT Equipment, Motor Vehicles and Assets under construction.

Records are kept of all acquisitions and disposals and the guidelines set out under section 5.22 to 5.23 of the Academy Trust Handbook are followed for all acquisitions and disposals.

Depreciation is applied in line the Academy Trust's depreciation policy.

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SECTION 8 - INSURANCE

Public & Employers Liability Insurance

This is provided by the RPA (Risk Protection Arrangement) through the DfE and renewed on an annual basis. Further details of cover levels are detailed in the policy booklet.

This policy is reviewed annually by the Trust Finance Manager to ensure cover is still relevant and value for money is being obtained.

Buildings and Contents Insurance

This is provided by the RPA through the DfE and renewed on an annual basis. Further details of cover levels are detailed in the policy booklet.

This policy is reviewed annually by the Trust Finance Manager to ensure cover is still relevant and value for money is being obtained.

Building Maintenance Insurance

No specific insurance is purchased. The Academy Trust employs Site Managers who are supported by the Trust Health & Safety Officer in managing the servicing and maintenance of the Academy Trust sites.

Absence Insurance

This is reviewed annually by the CFO to establish whether cover is required (on a school-by-school basis). Three quotes would be obtained if cover were needed.

Lettings Insurance

Any Hirer of any part of the Academies premises must provide a copy of their insurance.

Extended School

The school ensures the correct use of school premises when used by a third party, as per published guidance.

Minibus Insurance

When a minibus is hired in by the school, the Academy will ensure appropriate insurance arrangements are made. This option is available through Zurich Municipal.

School Activities Travel Insurance

This is provided by the RPA as detailed in the policy schedule.

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SECTION 9 - COMPUTER SYSTEMS/DATA SECURITY

The Academy Trust and Board of Directors register under The Data Protection Act. The Headteacher is responsible for controlling access to all data in the individual schools in accordance with the Data Protection Act ensuring that all staff are aware of their responsibilities/obligations at all times. The Trust will appoint an external Data Protection Officer and an Internal Data Protection Officer to monitor internal compliance, inform and advise data protection obligations, provide advice regarding Data Protection Impact Assessments (DPIAs) and act as a contact point for data subjects and the Information Commissioner's Office (ICO).

All information relating to personnel is processed in line with the 6 principles of UK GDPR.

- obtained and processed in a lawful, fair, and transparent manner
- held only for specified lawful purposes
- adequate, relevant but not excessive for those purposes
- accurate and up to date
- Retained for no longer than is required
- kept securely.

All personnel have the right to a copy of the personal data that the Trust is processing. This is a Data Subject Access Request and must be provided within 1 calendar month unless exceptional circumstances apply. Personnel also have the right to have their information rectified, deleted or restricted, unless the Trust have responsibilities that override these rights.

Any new use of personal information, including the sharing of personal data with other agencies, should be notified to the Information Commissioners Office (ICO) and the relevant pupils and staff.

Offences against the Data Protection Act 2018 are criminal, and individuals will be held personally responsible.

Access/Security

The purpose for controlling access is to ensure that only authorised personnel are able to access information that is relevant to the tasks for which they are responsible. It prevents unauthorised access to information which could result in accidental or deliberate corruption of the data, and which might contravene the confidentiality part of the Data Protection Act.

- The System Manager is the School Finance Officer. The Headteacher is responsible for the overall control of all systems, with the Deputy or CEO covering for absence.
- Access rights are determined and monitored by the System Manager. All devices (laptops, tablets, mobiles, memory sticks) that have access to data attached to the network are fully encrypted in line with current guidance from ICT.
- Multi Factor Authentication is enabled across the Trust.
- Computers are not left easily accessible by unauthorised users.
- Computer screens are locked (by password/locking the workstation) if left unattended.
- Access to software is restricted according to the level of access required for an individual to carry out their job to an expected level.
- Access rights are reviewed regularly by the System Manager and protected via passwords.
- Only Licensed Software, is installed onto the school's network, which is protected through a virus guard so that any files received from outside sources can be virus checked before being opened.

Cloud Technology

Where cloud technology is used to store personal or confidential data the school ensures that the supplier adheres to data protection legislation.

More information can be found on [Gov.UK](https://www.gov.uk).

Back Up

Back up is carried out automatically every night and the backed-up data is stored remotely. Further information is available from ICT4.

Transmission of Data

The transmission of personal or confidential data must always be over secure channels and the school ensures that any methods used, including email, do not lead to breaches of data protection legislation.

Computer Printouts

All information relating to income and expenditure, including payroll information that is downloaded and printed are stored in a lockable cabinet as they contain personal information relating to staff employed at the school.

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SECTION 10 - PERSONNEL/PAYROLL

Regulations

The Academy Trust is aware that there are a number of areas where Inland Revenue regulations which affect or determine the way payments are made. In particular, these relate to individuals who are self-employed and where individuals/companies are subject to Construction Industry Tax Scheme.

Controls are in place to ensure that tax obligations are met for any "off-payroll" working. This includes ensuring they are registered as a sole trader.

Controls are in place to ensure appointments are cleared through the Disclosure and Barring Service (DBS). Also, controls are in place to ensure that additional checks are made where required for a staff member's eligibility to work in the UK and their suitability to work with children.

Controls are in place to ensure DfE prior approval is sought before making any binding offers of severance/compensation payments to staff.

Recruitment

In-year staffing recruitment/amendments with an annual cost (including oncosts) of £1000 or more must be approved by the CEO/CFO before advertising or appointment.

Payroll

The Academy Trust payroll service is provided by Somerset Council HR Admin and Payroll. This service is purchased through Support Services for Education.

All new contracts, contract amendments and overtime/additional hours payments are processed by the School Finance Officer but authorised by the Headteacher before being forwarded to the Trust Finance/HR Team / HR Admin and Payroll for action.

The Trust HR Officer processes all payroll forms, and the Trust Finance Officer checks the monthly payroll prior to it being forwarded to HR Admin and Payroll for accuracy every month.

HR Admin and Payroll forward the prepared payroll files to the Trust Central Team; these files are checked by the Central Team Finance Officers, Assistant Trust Finance Manager or Trust Finance Manager for accuracy. Anomalies/inaccuracies are sent back to HR Admin and Payroll to review and correct. Once all anomalies/inaccuracies have been corrected, approval is given by the Trust Finance Manager or Assistant Trust Finance Manager to HR Admin and payroll to release for payment.

No employee can certify payroll expenditure from which he or she might personally benefit.

The Chair of Directors signs any amendments to the CEO's contract.

Links with SIMS FMS

Contract information held within SIMS.net Personnel feeds through to SIMS FMS providing salary and on-cost projections. The School Finance Officer ensures that SIMS.net Personnel is kept up to date with any contract changes and also with salary, Superannuation and National Insurance changes.

Pay Policy

The school has a separate Pay Policy which is reviewed annually by the Chief Executive and Finance Audit and Risk Committee.

Whistleblowing Policy

The Trust has a separate Whistleblowing Policy, the implementation of which is reviewed and communicated to staff regularly. Further information can be found on the following sites:

[Guidance and Code of practice for employers
Whistleblowing for employees](#)

[Contact details for HR & OD services](#)

[Southwest Internal Audit Partnership](#)

[NSPCC whistleblowing helpline](#)

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REGISTER OF BUSINESS INTERESTS

Academy Trusts are legally required to follow the guidance set out in the Academy Trust Handbook (ATH).

1.45 The trust **must** keep a register of any relevant business and financial interests, including governance roles in other educational institutions, for (as a minimum) members, trustees, local governors, and senior employees, serving at any point over the past 12 months.

1.46 The register **must** include their full names, date of appointment, term of office, date they stepped down (where applicable), who appointed them and relevant business and financial interests including:

- directorships, partnerships, and employments with businesses (please note that for an academy this is any business, not just a business that may potentially cause a conflict e.g. it could provide a service to the trust or school)
- trusteeships and governorships at other educational institutions and charities
- for each interest: the name and nature of the business, the nature of the interest and the date the interest began

1.47 The register **must** identify relevant interests from close family relationships between the academy trust's members, trustees, or local governors. It must also identify relevant interests arising from close family relationships between those individuals and employees. (A close family relationship is defined as "Family members who may be expected to influence, or be influenced by, that person in their dealings with the trust" and includes children as well as adults.)

1.48 Trusts should consider whether other interests should be registered, and if in doubt should do so. Boards of trustees **must** keep their register of interests up to date at all times.

Nil returns are required.

FORM - Register of Declared Interests for Members/Directors/Governors/Senior Staff – please delete as appropriate

Name of Employee/ Member/Director/Governor _____

Date of Appointment _____ Date of Resignation/Retirement _____

Name of Organisation	Nature of interest	Date interest began	Date interest ceased (if applicable)

Notes: 1. Make all entries in ink.

Record of Reviews (Clerk to distribute amendment and signature annually)

Date											
Initials											

Members/Directors/Governors are reminded that completion of this form does not remove the requirement upon them to disclose orally any interest at any specific meeting and to leave the meeting for that agenda item.

RETENTION OF RECORDS

Documentation, files, and records are retained to act as a record and support for actions taken and to assist future reviews of policy. They are also retained to satisfy the requirements of Internal Audit, External Audit, HM Revenue and Customs and the Inland Revenue. This section identifies the minimum period of time that records should be retained to satisfy all these requirements.

Financial Regulations require the retention of certain records for specified periods. If in doubt, a minimum of six years should be applied. Specific regulations are as follows.

COMPUTER TABULATIONS	6 years plus current year
SIMS DATA	6 years plus current year
COPY ORDERS	6 years plus current year
DELIVERY NOTES, CREDITOR INVOICES, CREDIT AND DEBIT NOTES	6 years plus current year
RECEIPT BOOKS	6 years plus current year
PETTY CASH BOOK	6 years plus current year
BANK STATEMENT, CHEQUE BOOK STUBS (Including analysed cheques)	6 years plus current year
CASH RECORDS AND TILL ROLLS	6 years plus current year
DEBTOR ACCOUNTS	6 years plus current year (providing debt has been collected)
INVENTORY RECORDS	6 years plus current year
TIMESHEETS	6 years plus current year
EMPLOYEES' RECORDS, PERSONNEL ACCIDENT REPORT	7 years following cessation of contract
TENDERS (schedule of limited/opened)	6 years plus current year after settlement of final account
TENDERS (schedule of price approvals, other correspondence)	6 years plus current year after settlement of final account
CONTRACT DOCUMENTATION, FINAL ACCOUNTS AND SUPPORT EVIDENCE	6 years plus current year after settlement of final account
OTHER SITE DOCUMENTS e.g. DIARIES	6 years plus current year (providing sufficient documentation is held confirming exact dates of work etc.)

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DIVISION OF DUTIES CHART

A. ORDERING	Head	Deputy Head	School Finance Officer	School /Trust Admin	CFO	TFM	ATFM / Trust Finance Officer	CEO
Authorise requisition form (budget holders)	✓	✓			✓.			✓
Process order on SIMS FMS			✓	✓		✓	✓	
Authorise order on SIMS FMS			✓			✓	✓	
Sign paper copy of order	✓	✓			✓	✓		✓
Check delivery notes to goods received			✓	✓			✓	
Check delivery notes to order			✓	✓				
B. INVOICE PAYMENTS								
B. INVOICE PAYMENTS	Head	Deputy Head	School Finance Officer	School / Trust Admin	CFO	TFM	ATFM / Trust Finance Officer	CEO
Check invoice to delivery note/order (where applicable)			✓				✓	
Sign invoice to authorise payment	✓	✓			✓			✓
Process invoice on SIMS FMS			✓			✓	✓.	
Authorise invoice on SIMS FMS			✓			✓	✓	
Print Cheques/Process BACS run from SIMS FMS			✓			✓	✓	
Check and sign cheques for payment/Authorise BACS run	✓	✓			✓	✓	✓	
Post cheques & remittance advice to creditors/Authorise BACS file in Lloydslink			✓			✓	✓	
Check payments on Bank Statement as part of Bank Reconciliation			✓				✓	
C. CREDIT CARD								
C. CREDIT CARD	Head	Deputy Head	School Finance Officer	School /Trust Admin	CFO	TFM	ATFM / Trust Finance Officer	CEO
Pre-approve spending via requisition form	✓	✓			✓	✓		✓
Process payment using credit card & record on monitoring sheet			✓				✓	
Record transaction on SIMS FMS as cash book journal			✓				✓	
Check credit card statement against receipts/manual records as part of Bank Reconciliation			✓				✓	
Approve credit card statement transactions	✓	✓			✓	✓		
E. INCOME								
E. INCOME	Head	Deputy Head	School Finance Officer	School /Trust Admin	CFO	TFM	ATFM / Trust Finance Officer	CEO

Raise invoices/request's income and keep records of all income due			✓				✓	
Collect income, count and record manually			✓	✓				
Issue receipts			✓	✓			✓	
Record on SIMS FMS			✓				✓	
Complete paying-in book			✓				✓	
Bank income			✓				✓	
Check income collected to amount banked and allocate in line with budget						✓	✓	
Check income received against records of income due			✓			✓	✓	
Pursue bad debts			✓		✓	✓		
F. BUDGET MANAGEMENT	Head	Deputy Head	School Finance Officer	School /Trust Admin	CFO	TFM	ATFM / Trust Finance Officer	CEO
Undertake reconciled process						✓	✓	
Allocate income if required			✓			✓	✓	
(Budget virement)					✓	✓		✓
Complete Balance Forms						✓	✓	
Sign and Check Balance Forms	✓				✓	✓		✓
Production of financial reports					✓	✓		
Review monthly reports	✓				✓			✓
Complete any budget movements required								
- Authorise	✓				✓	✓		
-Action								
G. PERSONNEL/PAYROLL	Head	Deputy Head	School Finance Officer	School / Trust Admin	CFO	TFM	ATFM / Trust Finance Officer	CEO
Complete pay roll forms for contract changes, supply, etc.			✓				✓	
Authorise payroll forms -CFO to authorise Headteacher's	✓	✓			✓			✓
Update SIMS.net Personnel for contract changes			✓				✓	
Check staff variances on SIMS FMS						✓	✓	
Check monthly payroll & casual payment/expenses claims.							✓	
Check monthly payroll for reasonableness & authorise casual claims	✓				✓	✓		
Release payroll back to HR Admin & Payroll for payment						✓		
Monitor staff budgets	✓				✓	✓		

**Appendix 4
Authorised Signatories:**

Name	Title	Bank Account Authorised Signatories
Mrs. Bernie Green Mrs Alison Draper Mrs Helen Cole Mrs Fiona Cobb	CEO CFO Trust Finance Manager Assistant TFM	PPAT Preston Kingfisher Manor Court Countess Gytha North Cadbury Huish Episcopi Hambridge Middlezoy & Othery Pen Mill Ash Evercreech Lovington Ilchester
Mrs Melissa Gibbons	Headteacher	Ash
Mrs Kristin Moth	Headteacher	Butleigh
Mr. Dave Gordon	Headteacher	Countess Gytha
Mrs Sarah Hann	Headteacher	Evercreech
Mrs Leanne Hall	Headteacher	Hambridge
Ms. Jennifer Chadbourne	Headteacher	Huish Episcopi
Mrs Michelle Mordue	Headteacher	Ilchester
Mr. Dan Glentworth	Headteacher	Kingfisher
Mrs Emma Marshall	Headteacher	Lovington
Mr. Luke Talmage	Headteacher	Manor Court
Mrs. Lyndsay Hayward	Headteacher	Middlezoy & Othery
Mrs Amy Truett	Headteacher	North Cadbury
Mrs Tracey Manning	Headteacher	Pen Mill
Mrs. Claire Hodgson	Headteacher	Preston

Appendix 5

Academy Expenditure – within Approved Budget

Expenditure Type	Restriction	Authority
Establishment – Teaching and non-teaching		CFO
Establishment – Leadership		CFO
Supplies and Services	Up to £999	Headteacher
Supplies and Services	£1,000 - £9,999	CEO/ CFO
Supplies and Services	£10,000+	Finance, Audit and Risk Committee

Academy Expenditure – outside of Approved Budget

Budget Holder Authorisation outside of Approved Budget

All expenditure outside of the approved budget must be approved by the CEO/CFO.

LETTINGS POLICY

This sets out the arrangements for the use of the school premises by groups, individuals, or organisations.

All hirers of the school premises will be made aware of the hire costs, terms, and conditions, including insurance requirements, **before** the hire and the agreement is signed (see [Appendix 6.2](#)). Where possible, fees are payable in advance. If this is not possible an invoice will be raised promptly.

Hire charges, where set, will be reviewed annually by the Headteacher. The charges will cover any costs incurred, i.e. heat and lighting, caretaker, and insurance. Current charges are as follows:

- £30 per hour per room (Reviewed 8th May 2024) **or locally agreed competitive rate**
- Caretaker costs are based on the current rates issued by Somerset Council's HR Admin and Payroll Section based on the number of rooms hired.
- An element for heating and lighting is added

Charges to children and youth groups may be subsidised if funds are available for this purpose. This is to be agreed on individual circumstances by the Headteacher and Local Governors.

There is currently no charge for the use of the premises by the PTA.

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HIRE OF EDUCATIONAL ESTABLISHMENTS

CONDITIONS OF HIRE

1. In these conditions,
 - (a) "The Establishment" means the school premises.
 - (b) "The Facilities" means the premises and/or equipment forming part of or belonging to the establishment which the Hirer has identified on his/her application form.
 - (c) "The Hirer" has the meaning defined at Clause 2 below.
 - (d) "The Hire Period" is the period or periods of hire set out in the application form and agreed by the Headteacher.
 - (e) "The Responsible Body" means the Board of Directors, its management committee or any other body charged with responsibility for the use of its premises by the community.
 - (f) "User/Users" are those people using the Facilities as members of the Hirer's party.

2. The Hirer

- 2.1 The Hirer is the person (whether acting as an individual or on behalf of a club or organisation) hiring the Facilities.
- 2.2 The person signing the application form shall be deemed to be the Hirer and must be over 18 years of age.
- 2.3 Where the person who signs the form indicates that he or she signs the application form for or on behalf of any club or organisation, that club or organisation shall also be deemed to be the Hirer and shall be jointly and severally liable with the person who signs this agreement for any breach or non-observance of these conditions and that person warrants that he/she is the duly authorised representative of the club or organisation concerned and has the necessary authority to sign this agreement on its behalf.
- 2.4 Should there be any default of payment by the club or organisation, the person signing the form shall be deemed personally liable.

3. Application for Hire

- 3.1 All applications for the hire of the Facilities must be in writing, or by e-mail, using the printed form.
- 3.2 The Facilities will be used solely for the event described on the application form.
- 3.3 If this booking relates to a regular and continuing booking this one undertaking shall be binding for all occasions when the Facilities are used, but a regular booking shall not create or cause a periodic tenancy in respect of the Facilities.
- 3.4 The information given by the Hirer in the booking form shall not imply that the Trust considers the Facilities are suitable for the purpose(s) for which they are to be hired or are adequate accommodation for the number of people attending, and the Trust gives no warranty that the Facilities are legally or physically fit for the purpose(s) for which they are hired.

- 3.5 The Headteacher or their representative may enter the Facilities at any time during the Hire Period to ensure that the terms of this agreement are being fulfilled, and the Hirer shall not at any time be entitled to exclusive possession as against the Trust or its duly authorised representative(s).
- 3.6 The Headteacher, or their representative, may refuse admission to any person without giving any reason for doing so and may similarly require any person to leave the premises.
- 3.7 Authority to accept or decline or postpone a booking shall rest with the Headteacher of the establishment or their representative whose decision shall be final.

4. Access to the Facilities

- 4.1 Provided the Hire Period has been agreed by the Headteacher, the Hirer and the Users will be given access to the Facilities by the School caretaker.
- 4.2 The caretaker will be present to unlock the premises at the beginning of the hire and will lock up at the end. They will not be available during the period of the hire.

5. Hirer's Responsibilities and the Safety of Users

- 5.1 The Hirer is responsible for the safe admission and departure of Users to and from the School and Facilities.
- 5.2 The Hirer must ensure that any necessary Disclosure and Barring Service (DBS) checks have been carried out for those supervising children during the Hire Period.
- 5.3 The Hirer is responsible for the behaviour and safety of the Users and must ensure that there are appropriate supervision levels at all times during the Hire Period.
- 5.4 The Hirer is responsible for ensuring that all necessary written permission forms have been obtained from children's parents to enable them to participate.
- 5.5 The Hirer must ensure that a qualified supervisor is present during all activities of a hazardous nature, i.e., karate, trampoline, gymnastics, swimming, judo or where the hiring organisation is a youth group.
- 5.6 The Hirer will be responsible for the provision of all such information, instruction, and supervision as is necessary to ensure the safety of any activity for which the Facilities are used.
- 5.7 The Hirer is responsible for any special needs or requirements of the Users.
- 5.8 The Hirer is responsible for the adequacy, suitability and safety of all equipment brought to the Facilities.
- 5.9 The Hirer shall not use the Facilities in such a way as to cause any nuisance, damage, disturbance, annoyance, inconvenience, or interference to the Facilities or adjoining or neighbouring property, or to the owners, occupiers, or users of such adjoining or neighbouring property.
- 5.10 It is the sole responsibility of the Hirer to obtain any necessary licence for the sale of drinks for the performance of plays and similar productions and for the playing of pre-recorded music.

- 5.11 The Hirer must ensure that there are sufficient stewards to prevent unauthorised persons from entering the Facilities and to ensure that guests are restricted to the Facilities and to the necessary means of access thereto.
- 5.12 The Hirer must ensure that all equipment is put back after use.
- 5.13 Any equipment brought to the Facilities must be removed at the end of each Hire Period.
- 5.14 The Hirer must familiarise themselves with the emergency procedures for fire, first aid and accident reporting and carry them out to the best of their ability.
- 5.15 If the alarm system is activated during the Hire Period, due to Users wandering into restricted areas of the building, then the Hirer will be responsible for any call out fee charged to reset the alarm.
- 5.16 The Hirer must have access to a phone or mobile phone (where there is a signal) at all times in case of an emergency.
- 5.17 The Hirer and the Users must participate in any evacuation drills or procedures operated by the school.
- 5.18 The Hirer must adhere to non-smoking legislation and the non-smoking policy of the Trust.

6. Condition of Facilities

- 6.1 The Facilities must be left clean and tidy after each Hire Period. If the Facilities are not cleaned to the reasonable satisfaction of the caretaker, the Hirer will be responsible for the cost to have them cleaned.

7. Payment

- 7.1 In the case of a one-off hire payment will be 14 days in advance of the hire unless otherwise agreed with the Headteacher in writing.
- 7.2 If the hire is for a regular let the establishment will invoice the Hirer in advance on a termly basis.
- 7.3 The Hirer shall be solely responsible for ensuring the agreed hire fee is paid. Failure to pay the agreed fee may result in future bookings being refused and legal action being taken to recover the outstanding debt.

8. Cancellation by the School

- 8.1 The Headteacher reserves the right to cancel an agreed booking for reasons including but not limited to: -
- The school requires the use of the Facilities.
 - The school considers that the Facilities are unfit for use.
 - Any reason beyond the school's control.
- 8.2 Any monies paid in respect of bookings cancelled in accordance with the above Conditions will be refunded to the Hirer. The School and the Responsible Body will not be liable for any other expenditure incurred, or loss sustained directly or indirectly by the Hirer or the User, arising from cancellation.

8.3 If the Hirer is in breach of these Conditions of Hire the Headteacher reserves the right to cancel a booking immediately and no refund will be given.

9. Cancellation by the Hirer

9.1 Full refund given if the school is informed a week in advance of cancellation. No refund given if less than 24 hours' notice, or at the Headteacher's discretion.

10. Damage

10.1 Any damage to the Facilities or the School should immediately be reported to the Caretaker.

10.2 If any damage is done to the Facilities, School equipment or any part of the School by the Hirer or the Users, the School may at its discretion carry out the necessary repairs and the Hirer will undertake to pay the cost of such reparation.

11. Insurance

11.1 It is a prerequisite of this Agreement that the Hirer has appropriate insurance cover.

11.2 The Hirer is responsible for arranging appropriate insurance cover. The Hirer must also consider taking out further cover for other risks not included such as cancellation.

11.3 The Hirer agrees to provide the Headteacher with a copy of their insurance policy prior to the Hire Period and thereafter upon request.

12. Liability Generally

12.1 Except in the case of death or personal injury caused by the negligence of the Trust, The Board of Directors shall not be liable to the Hirer in contract, tort, negligence, breach of statutory duty or otherwise for any loss, damage, costs, or expenses of any nature incurred by the Hirer.

12.2 The Hirer shall indemnify and keep the Trust indemnified against all losses, claims, demands, actions, proceedings, damages, costs or expenses or any other liability arising in any way from this Agreement and any breach of any of the Hirer's undertakings/agreements contained in this Agreement.

12.3 The Hirer shall not do or permit or suffer to be done by any act, matter or thing which would or might constitute a breach of any statutory requirement affecting the Facilities or which would or might vitiate in whole or in part any insurance effected in respect of the Facilities from time to time.

13. Car Parking

13.1 The parking of vehicles within the school site in the car parking area, by the Hirer and the Users shall be subject to the agreement of the Headteacher and permitted only on condition that:

- They park at their own risk and that they accept responsibility for any damage caused to their vehicles or any injury to any person or the property of the school by the vehicles or the presence of such vehicles at the school.
- The Hirer shall maintain at all times adequate means of access for emergency vehicles.

14. No assignment/sub-contracting

14.1 The Hirer shall not be entitled to assign the benefit of, delegate the burden of, or sub-contract all or any of its rights and obligations under, these Conditions of Hire.

15. Variation

15.1 The Responsible Body reserves the right to vary these Conditions of Hire at any time or to make special arrangements in any particular case. The varied conditions of hire will not be effective until a copy is given to the Hirer.

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APPLICATION FOR HIRE

I hereby apply for the use of the facilities detailed below:

Club/Organisation:

Accommodation required:
.....

Equipment/Furniture required:
.....

Equipment, etc to be brought onto premises by Hirer (if any):

Heating required: Yes/No

Insurance required: Please attach a copy of your own Public Liability Insurance Policy to this application.

Qualification of Hirer [Point 5.5](#) of Hirer's Responsibilities and the Safety of Users:
.....

Applicant's Name
.....

Address:
.....
.....

Telephone No:
.....

Treasurer:
.....

Address:
.....

Telephone No:
.....

Date required:
.....

Alternative Date:
.....

Times: From: To:

Approximate number of people:
.....

I have read and agree to be bound by the Conditions of Hire. I can confirm that I have the appropriate safeguarding and child protection policies and procedures in place.

Signed in a personal capacity and on behalf of

whose authority I have to bind them by signing this application.

Signed:

.....

Date:

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Directors' and Governors' Expenses Policy

Preston Primary Academy Trust

Governance Expenses Policy

Introduction

This policy has been written to comply with the Charity Commission's guidance (CC11) to Trustees regarding the payment of Trustee expenses and payments and follows its guidance on [Trustee Expenses](#)

This document refers to directors of Preston Primary Academy Trust and governors of any Local Governing Body within the Trust. The term Chair refers to the Chair of the Preston Primary Academy Trust board (for Directors) or the Chair of a Local Governing Body (for LGB governors).

Preston Primary Academy Trust believes that paying Director and Governor allowances, in specific categories set out below, is important in ensuring equality of opportunity to serve as Director/Governor for all members of the community and is therefore an appropriate use of Trust and school funds. The specific items allowable reflect this objective.

Director and Governor Allowances

All Directors and Governors will be able to claim for the following, on a case-by-case basis and with the prior approval of the Chair. They will be entitled to claim the actual costs they incur providing the expenses are incurred in carrying out their duties.

- Childcare or babysitting allowances (excluding payments to a current/former spouse or partner).
- Cost of care arrangements for an elderly or dependent relative (excluding payments to a current/former spouse or partner).
- The extra costs they incur in performing their duties either because they have special needs or because English is not their first language.
- The cost of travel relating only to travel to meetings/training courses in accordance with the Approved Mileage Rate published by HM Revenue and Customs.
- Reasonable travel and subsistence costs, associated with attending national meetings or training events, unless these costs can be claimed from any other source. Travel costs may include public transport, taxi fares, and petrol allowances to the level permitted by HM Revenue & Customs (HMRC) before tax becomes payable
- Telephone charges, photocopying, stationery, postage etc.
- Any other justifiable allowances as agreed by the Chair (in advance of expenditure being made).

All Directors and Governors acknowledge that:

- They may not be paid attendance allowance.
- They may not be reimbursed for loss of earnings.

Making An Expenses Claim

Directors and Governors wishing to make claims under these arrangements, once prior approval has been sought from the Chair, should complete a claims form (obtainable from the Trust or School Office), attaching receipts where possible, and return it to the School within two weeks of the date when the allowances were incurred, when they will be submitted for approval by the Chair for final approval.



Anti-Fraud Policy and Response Plan

Anti-Fraud Policy and Response Plan

Introduction

This policy outlines how the Trust prevents, detects, and responds to fraud, **corruption**, theft, and financial irregularity across its schools and central team.

PPAT is committed to ensuring that it acts with integrity and has high standards of personal conduct. Everyone involved with the Trust has a responsibility in respect of preventing and detecting **all types of financial irregularity**. All staff; volunteers, directors and local governors have a role to play. The Trust also recognises the role of others in alerting them to areas where there is suspicion of fraud.

Recognising a potential fraud and being able to report it is just as important as the measures to prevent and detect.

It is the duty of all employees, directors and local governors at PPAT to take reasonable steps to limit the possibility of corrupt practices, and it is the responsibility of identified staff and Auditors to review the adequacy of the measures taken by the Trust to test compliance and to draw attention to any weaknesses or omissions.

Any investigation carried out in relation to alleged irregularities will be carried out in accordance with the Disciplinary Policy.

This policy should be read in conjunction with the Trust's Whistleblowing Policy, Finance Policy, Staff and Governance Codes of Conduct, and Data Protection Policy.

Definitions

Fraud

Fraud is a general term covering theft, deliberate misuse or misappropriation of assets or anything that leads to a financial advantage to the perpetrator or others upon whose behalf he or she acts, even if these "others" are in ignorance of the fraud. Fraud is ~~in fact~~ intentional deceit and for this reason it cannot include negligence.

Fraud incorporates theft, larceny, embezzlement, fraudulent conversion, false pretences, forgery, corrupt practices and falsification of accounts.

Corruption

The term 'corrupt practices' is defined for the purpose of this Policy as the offering, giving, soliciting or acceptance of an inducement or reward which may influence the actions taken by the Trust, its staff, directors or local governors. Corrupt practices are an abuse of entrusted power for private benefit that usually breaches laws, regulations, standards of integrity and/or standards of professional behaviour.

Financial Irregularities fall within the following broad categories, the first three of which are criminal offences.

- Theft - the dishonest taking of property belonging to another person with the intention of depriving the owner permanently of its possession.
- Fraud - the intentional distortion of financial statements or other records by persons internal and external to the Trust, which is carried out to conceal the misappropriation of assets or otherwise for gain.
- Bribery and corruption - involves the offering or the acceptance of a reward, for performing an act, or for failing to perform an act, which leads to gain for the person offering the inducement.
- Failure to observe, or breaches of, the Scheme of Delegation and Financial Regulations and Trust's procedures which in some circumstances can constitute an irregularity, with potentially significant financial consequences.

Examples of what could constitute fraud and corruption are

- theft of cash.

- non-receipt of income.
- substitution of personal cheques for cash.
- travelling and subsistence claims for non-existent journeys/events.
- travelling and subsistence claims inflated.
- manipulating documentation to increase salaries/wages received, e.g. false overtime claims.
- payment of invoices for goods received by an individual rather than the Trust/School.
- failure to observe, or breaches of, regulations and/or other associated legislation laid down by the Trust.
- unauthorised borrowing of equipment.
- breaches of confidentiality regarding information.
- failure to declare a direct pecuniary or otherwise conflicting interest.
- concealing a generous gift or reward.
- unfairly influencing the award of a contract.
- creation of false documents.
- deception.
- using position for personal reward.

The above list is not exhaustive and fraud and corruption can take many different paths. If in any doubt about whether a matter is an irregularity or not, clarification must be sought from the Chief Executive Officer (CEO). If there is concern or doubt about any aspect of a matter which involves an irregularity, or an ongoing investigation into a suspected irregularity, seek advice from the Chief Finance and Operations Officer (CFO)

Prevention Measures

The Trust has adopted the following measures to demonstrate its commitment to anti-fraud and corruption:

- The Finance and Audit and Risk Committee meets regularly to review expenditure.
- All senior staff, directors and local governors are required to declare prejudicial interests and do not contribute to business related to those interests.
- All staff, directors, and local governors are required to disclose personal interests.
- All staff, directors, and local governors are made aware of the gifts and hospitality policy.
- There is a clear scheme of delegation and financial delegation in place.
- There are clear recruitment policies and procedures.
- The Trust has secure IT systems, conducts cybersecurity audits, and educates staff on digital threats such as phishing and ransomware.

Roles and Responsibilities

All Directors

- Act in accordance with the 7 principles of public life (the 'Nolan principles')
- Take full responsibility for the trust's financial affairs
- Make sure that the trust has an effective system of internal control to prevent and detect fraud
- Review and approve the fraud policy.
- Take appropriate action if an executive leader or Director is found guilty of fraud or attempted fraud

Finance, Audit and Risk Committee

- Review the effectiveness of internal controls

- Consider the outcomes of internal and external audit work related to fraud risks
- Review the trust's risk register and makes sure risks are being addressed appropriately
- Monitor the implementation of this policy

There are some staff who have a specific responsibility for overseeing the financial arrangements on behalf of the Board of Directors.

The CEO as the **Accounting Officer** is accountable for establishing and maintaining a sound system of internal control that supports the achievement of the Trust's policies, aims and objectives. Their responsibilities include

- Maintaining oversight of the trust's financial transactions, including the implementation of robust internal controls
- Ensuring compliance with the Academy Trust Handbook
- Ensuring all staff, directors, local governors and volunteers are aware of their responsibilities under this policy

Overall responsibility for managing the risk of fraud is delegated to the CFO.

The responsibilities of the CFO include:

- Developing a risk management plan as part of the risk management process and undertaking a regular review of the fraud risks associated with each of the categories in order to keep the risk management plan current.
- Establishing and maintaining an effective Fraud Policy and Fraud Response and Investigation Plan, commensurate to the level of fraud risk identified in the risk management plan.
- Designing an effective control environment to prevent fraud commensurate with the risk management plan through a system of internal controls.
- Establishing appropriate mechanisms for:
 - reporting fraud risk issues.
 - reporting significant incidents of fraud to the Accounting Officer.
 - external reporting in compliance with Company Law, Accounting Standards and Charity Commission expectations.
 - coordinating assurances about the effectiveness of Fraud policies to support the Statement of Internal Control.
 - Liaising with the Finance and Resources Committee on issues of fraud prevention, detection, and management.
 - Making sure that staff are aware of the Fraud Policy and know what their responsibilities are in relation to combating fraud.
 - Ensuring that appropriate Anti-Fraud training and development opportunities are available to appropriate staff.
 - Ensuring that vigorous and prompt investigations are carried out if fraud occurs or is suspected.
 - Making recommendations about legal and/or disciplinary action against perpetrators of fraud.
 - Making recommendations about disciplinary action against supervisors where supervisory failures have contributed to the commission of fraud.
 - Making recommendations about disciplinary or legal action against staff who fail to report fraud.
 - Taking appropriate action to recover assets.

- Ensuring that appropriate action is taken to minimise the risk of similar frauds occurring in future.

The trust finance manager, head teachers and school finance officers are responsible for:

- Implementing this policy across the Trust
- Ensuring that an adequate system of internal control exists within their areas of responsibility and that controls operate effectively.
- Preventing and detecting fraud.
- Assessing the types of risk involved in the operations for which they are responsible.
- Regularly reviewing and testing the control systems for which they are responsible.
- Ensuring that controls are being complied with and their systems continue to operate effectively.
- Implementing new controls to reduce the risk of similar fraud occurring where frauds have taken place.

The Internal Auditors/Organisation conducting the internal scrutiny and the External Auditor are responsible for:

- Delivering an opinion to the Accounting Officer on the adequacy of arrangements for managing the risk of fraud and ensuring that the Trust promotes an Anti-Fraud culture.
- Assisting in the deterrence and prevention of fraud by examining and evaluating the effectiveness of control commensurate with the extent of the potential exposure/risk in the various segments of the Trust's operations.
- Ensuring that the Executive Leadership Team has reviewed its risk exposures and identified the possibility of fraud as a business risk.
- Assisting the Executive Leadership Team in conducting fraud investigations.
- Reporting to the Finance, Audit and Risk Committee on the efficiency of controls for the prevention, detection and management of fraud.

Every member of staff is responsible for:

- Acting with propriety in the use of official resources and the handling and use of public funds whether they are involved with cash or payments systems, receipts or dealing with suppliers or the Schools' decision-making bodies.
- Conducting themselves in accordance with the [seven principles of public life](#) set out in the first report on Standards in Public Life by the Nolan Committee.
- Being alert to the possibility that unusual events or transactions could be indicators of fraud.
- Reporting details immediately through the appropriate channel if they suspect that a fraud has been committed or see any suspicious acts or events.
- Cooperating fully with whoever is conducting internal checks or reviews or fraud investigations.

Fraud Response and Investigation Plan

The Trust has a Fraud Response and Investigation Plan that sets out how to report suspicions, how investigations will be conducted and concluded

Introduction

The purpose of this plan is to define the responsibilities for action in the event of a suspected fraud. Its focus is to:

- establish responsibilities for investigating the incident and taking appropriate action
- establish and secure evidence for disciplinary and/or criminal action
- prevent further loss

- recover losses
- establish lines of communication with the police.

Procedure

Action of employees, directors and governors

If you become aware of a suspected fraud or irregularity, you should ~~write down~~ **report** your concerns immediately.

Make a note of all relevant details, such as what was said on the telephone or during other conversations, the date, the time and the names of anyone involved.

School-based staff should report the matter immediately to the School Finance Officer, the CFO or in their absence the Head Teacher or CEO. Central team staff should report their concerns to the CFO. If the concern is about a Head teacher, the CFO or CEO or it is believed that they may be involved in the wrongdoing in any way, staff members should report their concern to the Chair of the Board.

When you report your concerns, you must be prepared to hand over any notes or evidence you have already gathered. Confidentiality is of paramount importance throughout the process.

A member of staff, director or governor may choose to report concerns anonymously and such anonymity will be respected. It should be noted that if the report suggested criminal activity and the case is referred to the police, the identity of the person reporting the details will be needed at a later date if criminal proceedings are to be pursued effectively. Identification is preferred and will assist the investigation.

You must **not** do any of the following:

- contact the suspected perpetrator in an effort to determine the facts and demand answers
- discuss the case facts, suspicions or allegations with anyone other than members of the Finance Audit and Risk committee and their nominated investigators.
- attempt to personally conduct an investigation of your own.

Malicious allegations

If an allegation is made frivolously, in bad faith, maliciously or for personal gain, disciplinary action may be taken against the person making the allegation.

Action by the Trust

The Trust **must** notify the DfE as soon as is operationally practical based on its particular circumstances, of any instances of fraud, theft and/or irregularity exceeding £5,000 individually, or £5,000 cumulatively in any academy 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 if not, why)
- whether insurance cover or the risk protection arrangement have offset any loss

The Finance, Audit and Risk Committee will convene an extraordinary meeting in the event of a suspected Fraud situation.

Any member of staff who reports a suspected fraud should feel confident they will be listened to seriously and sensitively. They should be given a fair hearing and they should feel reassured that they will not suffer because they have voiced their suspicions.

If any of the member of the Finance, Audit and Risk Committee are personally implicated in the suspected fraud, it should be reported instead directly to the Chair of The Trust and the Chair of the Finance, Audit and Risk Committee. In such circumstances, the Chair of the Trust will determine, in consultation with the Chair of the Finance and Resources Committee, the procedure for examining the facts of the suspected fraud, any subsequent investigation and for deciding action.

The Chair of the committee will call a meeting of the Finance, Audit and Risk Committee at the first available opportunity, ideally within 24 hours of the suspected fraud being reported. Where members of Finance, Audit and Risk Committee are not available, suitable alternatives can be appointed by the Trust Board.

The Finance, Audit and Risk Committee will consider the report of suspected fraud and decide whether to instigate an investigation to establish the facts of what has taken place whether to:

- recommend to the Chief Executive Officer that the matter is reported to the police
- recommend to the Head Teacher to suspend the individual(s) suspected pending further investigation (see 3. below).

In circumstances where immediate action is required decisions will be taken by the Chief Executive/CFO in discussion with the Trust Chair/Chair of Finance, Audit and Risk Committee. Where further evidence is required before deciding whether to instigate an investigation, the Finance, Audit and Risk Committee will commission the gathering of further evidence and reconsider the position in order to make a decision.

Suspension pending investigation

Where time allows, the Finance, Audit and Risk Committee will consider whether to make a recommendation to the Chief Executive Officer to suspend the individual(s) suspected pending further investigation. The prime consideration in this respect is to prevent further loss and/or the destruction or removal of evidence. Where immediate action is required, this will be taken in line with the delegation in the paragraph above.

Where an individual is to be suspended, they should be approached unannounced and asked to attend a meeting, where the suspension is confirmed and explained. Wherever possible, they should be given the opportunity to be accompanied at the meeting by a trade union representative or work colleague. If it is not possible for them to be accompanied, the meeting may proceed nonetheless so that action can be taken to prevent further loss and/or the destruction or removal of evidence. Following suspension, the individual(s) will be supervised at all times before leaving the premises. Only personal property may be removed and all keys must be surrendered. The IT Services Provider will be informed and access to Trust IT systems denied immediately. The individual will be sent confirmation of the suspension, in writing.

Suspension pending investigation of suspected fraud does not imply that it has been established that fraud has taken place and does not represent disciplinary action. Members of staff will remain on full pay during the period of suspension. Any action taken will be in line with Trust HR policies.

Investigation of suspected fraud

The Finance, Audit and Risk Committee will normally commission an internal investigation of the suspected fraud but will have authority to appoint other experts to conduct the investigation where necessary. All investigations will be conducted in line with the Trust's HR policies.

The Trust, its employees and Directors, will make available to the investigator all such information and records as are necessary to pursue the investigation.

The matters investigated will be kept confidential in so far as this does not hinder or frustrate the investigation process.

The investigator will prepare a report setting out their findings from the investigation. The report will cover:

- an opinion on whether a fraud has been committed and the reasons and summary evidence in support of the opinion
- where the opinion is that a fraud has been committed, description of the fraud, value of loss, people involved and the means by which the fraud was perpetrated
- measures already taken or to be taken to prevent recurrence
- any recommendations for action to strengthen future responses to fraud.

The Finance, Audit and Risk Committee will consider the report and determine whether it demonstrates that a fraud has been committed and who may be responsible. In the light of their conclusions, the Finance, Audit and Risk Committee will decide the action to be taken, as follows:

- if it is determined on the basis of the evidence that no fraud has taken place, the Finance and Resources Committee will agree action to ensure that all relevant parties are informed. If any individual(s) have been suspended pending investigation, the Director of Finance Manager will be responsible for advising on action relating to the lifting of the suspension in the case of staff.
- if it is determined on the basis of the evidence that a fraud has taken place, the Finance, Audit and Risk Committee will refer to the Disciplinary Procedure in the case of staff. The Committee will also agree any action necessary under the Trust's requirements for reporting to external bodies such as the DfE and Charity Commission.
- The Committee may recommend to the Chief Executive Officer that the matter is reported to the police if this has not happened at an earlier stage and/or that civil action is taken to recover losses.

If the report recommends improvements to the Trust's control systems, the CFO and Board will ensure that these are implemented at the earliest opportunity.

Where the matter is referred to staff disciplinary procedures, a separate investigation under those procedures will be necessary and evidence from the Finance, Audit and Risk Committee's investigation will form part of the disciplinary investigation.

Recovery of losses

The Finance, Audit and Risk Committee will assess the opportunity for recovering any losses, including taking legal action through the Courts, where appropriate. The CEO will be responsible for ensuring that any legal action is pursued.

The DfE will not tolerate fraud. It reserves the right to conduct or commission its own investigation into actual or potential fraud, theft or irregularity in any trust, either as the result of a formal notification from the trust itself or as the result of other information received, DfE may involve other authorities, including the police, as appropriate. The DfE will publish reports in line with its own policy on publishing information.