

FINANCE POLICY

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VERSION	REVIEWER/APPROVAL	REVIEW NOTES
1. 02.04.19	ALET Board	Full Review
2. 09.12.20	Chief Finance Officer/Head of G and C/Head of HR	Full Review
3 13.10.22	Chief Finance Officer/ALET Finance Committee	Language updates
4 16.08.23	CFO	Update to align to Academies Financial Handbook 23
5. 12.02.26	CFO	Aligned policy language to current Academy Trust Handbook conventions and updated references from ESFA to DfE where applicable
5. 12.02.26	CFO	Clarified CFO/Head of Finance roles/Transactional Finance Manager Roles.
5. 12.02.26	CFO	Replaced legacy platform names (e.g., Mondas) with current finance systems (Financials Live) and updated who authorises journals, bank entries, and reconciliations.
5. 12.02.26	CFO	Moved from legacy EU/OJEU references to Procurement Act 2023 approach; added VAT-inclusive January 2026 sub-central thresholds and added Central Digital Platform/Find a Tender advertising references
5. 12.02.26	CFO	Clarified borrowing approvals to reflect DfE consent requirements and introduced wording that only non-approved DfE leased assets require prior approval (finance leases), aligning with the new sector position

Finance Policy

Our mission is “to deliver excellence in education and to transform lives through learning”, bringing to life our core values of empowerment, enterprise, connectedness, and transformation. We work hard to ignite confidence, expand opportunities, energise the community, and generate prosperity.

These values are further supported by [our learning philosophy](#), rooted in the dynamics between the brain, motivation and our emotions.

Policy Statement

This policy sets out expectations regarding the compliance with financial regulations and internal controls within Activate Learning Education Trust.

Principles

As per the Education and Skills Funding Agency’s [Academies Accounts Direction 2024 - 25](#), these accounting policies aim to set out the principles, bases, conventions, and rules by which transactions and items are recognised, measured, and presented in the academy trust’s accounts.

Contents

1. Aims
2. Financial Management and Governance
3. Financial Reporting, Planning and Control
4. Income
5. Expenditure
6. Payroll
7. Cash and Banking
8. Treasury and Cash flow management
9. Fixed Assets and Inventory
10. Integrity and Openness
11. Other Matters
12. Appendix A: Fraud Policy

1. Aims

1.1 Purpose of this document

The purpose of this Finance Policy is to provide control over the totality of the resources of Activate Learning Education Trust (“the Trust”) and provide management with assurances that the resources are being properly applied for the achievement of the Trust’s charitable objects, strategic plan and business objectives on a sustainable basis including:

- Ensuring financial viability.
- Achieving value for money.
- Fulfilling its responsibility for the provision of effective financial controls over the use of public funds.
- Ensuring that the Trust complies with all relevant laws and regulations; and
- Safeguarding the assets of the Trust.

1.2 Status

This document sets out the financial regulations of the Trust. It translates into practical guidance of the Trust’s

broad policies relating to financial control.

These financial regulations are subordinate to the institution's memorandum and articles of association and to any restrictions contained within the funding agreement with the funding body and the funding body's Academy Trust Handbook.

Compliance with the financial regulations is compulsory for all staff. A member of staff who fails to comply with the financial regulations may be subject to disciplinary action under the Trust's disciplinary policy. Any such breach will be notified to the Board through the finance, resources and audit committee. It is the responsibility of managers to ensure that their staff are made aware of the existence and content of the Trust's financial regulations.

The finance and audit committee is responsible for reviewing the financial regulations and advising the Board of any additions or changes necessary. In exceptional circumstances, this committee may authorise a departure from the detailed provisions of the regulations with such departures reported to the Board at the earliest opportunity.

2 Financial Management and Governance

2.1 Board of Trustees

The Board has ultimate responsibility for ALET's finances, approving accounting policies (applied consistently across academies), and ensuring economy, efficiency and effectiveness (value for money), regularity and propriety. It must comply with company directors' duties under the Companies Act 2006 and with the Academy Trust Handbook (current edition).

2.2 Accounting Officer

The Chief Executive Officer is the Accounting Officer, personally responsible to Parliament and the public for regularity, propriety and value for money. Responsibilities include keeping proper financial records and accounts, supported by the CFO and The Head of Finance.

2.3 Committee structure

The Board has appointed an Audit & Risk Committee to oversee internal scrutiny and external audit, and report on the operation of systems of control and the discharge of financial responsibilities. Local Governing Committees operate as committees of the Trust and are appraised of specific grants but have no delegated financial authorities.

2.4 Academy Headteachers

Headteachers are responsible, with CFO support, for the academy budget and its long-term sustainability, ensuring basic financial controls and the application of regularity, propriety and value for money. Specific responsibilities include approving staff appointments within authorised establishment and budget, authorising transactions per the Scheme of Delegation, and managing the delegated budget.

2.5 Chief Financial Officer and Finance Team

The CFO manages financial strategy and operations, monthly management accounts and forecasting, and ensures effective systems of internal control including segregation of duties. The Head of Finance prepares monthly management reports, oversees purchase ordering and statutory returns to DfE. The Transactional Finance Manager maintains records, independent checks and reconciliations.

2.6 Budget Holders

Budget Holders are responsible for financial management in their areas, supported by Finance. They must provide information for accounts preparation, financial planning, and audit reviews, and maintain clear lines of responsibility.

2.7 Relationships between academies, the Trust and the Trust's sponsor

Academies will contribute an agreed element of recurrent income towards the cost of the central services including infrastructure, Finance, ICT, HR & Payroll and Governance. Academy contributions will be reviewed and approved by the Board. Services provided by the Trust sponsor will demonstrate value for money and comply with the requirements of the DfE including those set out in the Academy Trust Handbook.

2.8 Risk management

The Board ensures a risk management strategy and common approach across ALET, embedding a structured risk process. The risk register is approved and reviewed routinely.

2.9 External audit

External auditors are appointed annually by the Board, advised by the Audit & Risk Committee. Competitive retender at least every five years is good practice. External audit reports on the annual financial statements and regularity, per the Academies Accounts Direction, auditing standards and funding requirements.

3 Financial Reporting, Planning and Control

3.1 Recording transaction

All transactions must be authorised per these regulations. Journals must be documented and authorised by the CFO. Bank transactions input by Finance Officers must be checked and evidenced by the Transactional Finance Manager and Head of Finance.

3.2 Financial plans and budgets

The Academy prepares both medium-term and short-term financial plans. The medium-term financial plan is prepared as part of the development planning process. The development plan indicates how the Academy's educational and other objectives are going to be achieved within the expected level of resources over the next three years.

The development plan provides the framework for the annual budget. The budget is a detailed statement of the expected resources available to the Academy and the planned use of those resources for the following year.

The Chief Financial Officer, in combination with the Head of Finance and CEO is responsible for preparing the annual budget and three-year financial plan for approval by the Board. The CFO is also responsible for preparing financial planning returns for submission to the funding body.

The budgetary planning process will be agreed each year and incorporate the following elements:

- Forecasts of the likely number of pupils to estimate the amount of grant receivable.
- Review of other income sources available to assess likely level of receipts.

- Review of past performance against budgets to promote an understanding of the cost base.
- Identification of potential efficiency savings; and
- Review of the main expenditure headings considering the development plan objectives and the expected variations in cost e.g. pay increases, inflation and other anticipated changes.

Plans and budgets should be revised until income and expenditure are in balance when possible. If a potential surplus is identified, this may be held back as a contingency or alternatively allocated to areas of need.

3.3 Monitoring and review

Monthly financial reports will be prepared by the Head of Finance. The reports will detail actual income and expenditure against budget both for budget holders and at a summary level for Academy senior management and Trust Board.

3.4 Budgetary control

Budgetary Control of income and expenditure within an agreed budget is the responsibility of the designated budget holder who must ensure that day to day monitoring is undertaken effectively. Significant departures from agreed budgetary targets must be reported immediately to the Head of Finance by the budget holder concerned and if necessary, corrective action taken.

The monitoring process should be effective and timely in highlighting variances in the budget so that differences can be investigated, and action taken where appropriate.

4 Income

4.1 General

The Chief Financial Officer is responsible for ensuring that appropriate procedures are in operation to enable the Trust to receive all income to which it is entitled. The Head of Finance ensures procedures to receive and record all income. The Transactional Finance Manager ensures prompt collection, security and banking. Grants and claims must be recorded accurately; claims submitted on time.

4.2 Trips

A lead teacher must be appointed for each trip to take responsibility for the collection of sums due. The lead teacher must prepare a record for each student intending to go on the trip showing the amount due. Students should make payments in accordance with the Academy's financial procedures. This is normally done through ParentPay. A receipt must be issued for all monies collected and the value of the receipt and the number of the receipt recorded against the student making the payment. Staff at the Academy should maintain an up-to-date record for each student showing the amount paid and the outstanding amount. This record should be sent to the lead teacher on a weekly basis, and the lead teacher is responsible for chasing the outstanding amounts.

The Head of Finance must take care to ensure that the income recognised for trips always matches the costs incurred as trips should be cost neutral to ALET.

4.3 Lettings

The Academy Admin team maintain bookings and take payments in advance where possible. Invoices are raised via the finance system; Finance chase debts and suspend access if unpaid.

4.4 Invoiced income

The Transactional Finance Manager should ensure that:

- Debtors' invoices are raised promptly on official invoices when requested through the finance system, in respect of all income due to the institution.
- Invoices are prepared with care, recorded in the ledger, show the correct amount due and are credited to the appropriate income account.
- Any credits granted are valid, properly authorised, and completely recorded.
- VAT is correctly charged where appropriate and accounted for.
- Monies received are posted to the correct debtors' account.
- Swift and effective action in collecting overdue debts, in accordance with the protocols noted in the financial procedures.
- Outstanding debts are monitored, and reports prepared for management.

No debts should be written off without the appropriate approval as stated in the table below. The Chief Financial Officer will also notify the Board of any write-offs over £1,000 which should be authorised as being non-collectable.

Value of Debt	Approval Required
Up to £1,000	Headteacher/Head Teacher
Over £1,000 up to £5,000	CEO or deputy CEO
Over £5,000 up to £45,000 (or 1% of income, whichever limit is lower shall apply)	Board of Trustees
Either over £45,000 <u>or</u> over 1% of income – being all other proposed write offs	Secretary of State

4.5 Cash income

All cash and cheques must be kept in a safe prior to banking. Banking frequency should be determined by value, more frequently if the sums collected exceed the insurance limit on the safe. Monies collected must be banked in their entirety in the appropriate bank account. The Finance Team is responsible for preparing reconciliations between the sums collected, the sums deposited at the bank and the sums posted to the accounting system.

4.6 GAG Pooling

The Trust operates a General Annual Grant (GAG) pooling approach where pooled funds are allocated to Academies within the Trust as agreed by the CFO and CEO.

The pooled allocation can be used to meet the normal running costs at any of its constituent academies. Pooled balances will also be used to cover the cost of the effective management of the Trust. However, specific capital funding if applicable (Condition Improvement Fund) must be allocated to the relevant academy.

Funding will be allocated to academies once the annual budget has been approved by Trustees.

In line with the Academy Trust Handbook, if a Headteacher considers their academy has been unfairly treated then they are to first raise this with the CEO detailing their concerns in writing. Where a resolution has not been reached through the CEO, then the Headteacher's concerns must be escalated to the Board for consideration. Only after the full Board has approved the budget, can the Headteacher, if they still feel their academy is being unfairly treated, apply via the DfE for the Secretary of State to intervene.

5 Expenditure

The Transactional Finance Manager is responsible for payments to suppliers, ensuring regularity, propriety, value for money and compliance with procurement law and the Academy Trust Handbook.

5.1 Ordering

Ordering Process

Purchase orders should be used to initiate and document purchase commitments to:

- Ensure that the Academy has a record of what has been ordered which can be compared against items delivered.
- Record that the purchase was approved by authorised signatory; and
- Allow the Trust, academy, and budget holder to monitor purchase commitments. All purchase orders must be placed through Financials Live

Failure to follow these procedures may result in disciplinary action

Exceptions

In the following instances the use of Financials Live may be waived:

- Recurring charges for public utilities.
- Periodic contracted payments.
- Petty cash purchases.
- Purchase made using an academy credit card.
- Exam fees.
- Any other exceptions approved by the Chief Financial Officer.

The following items may be actioned without the initial use of Financials Live but are not exempt from the PO process. They may be raised retrospectively however, must still have a PO raised:

- Emergency order.
- Supply cover (where there is a robust process for recording requests for staffing and for hours or days delivered); and

Below is a table showing the expenditure authority limits which the Trust's employees are required to comply with. Where a role does not exist at an academy, e.g. Vice Headteacher then the Academy Headteacher must approve in their place. Authority for approving expenditure cannot be delegated downwards.

Value of order – between £ and £	Authoriser required
From £0 to £1,000	Budget Holder
From £1,001 to £5,000	As delegated by leadership group member
From £5,001 to £25,000	Leadership Group Member
From £25,001 to £75,000	CEO or Deputy CEO
Over £75,000	Board of Trustees
Large purchases above national procurement threshold	Large purchases above national procurement thresholds must follow regulated procedures

5.2 Quotes and tenders

The key requirements for quotes and tenders are:

Purchases under £5,000	Value for money must be sought in such purchases. Quotes may be obtained if appropriate. A preferred supplier should be used where possible.
Purchases between £5,001 and £25,000	Obtain and retain three written quotes. If three quotes have not been received, evidence of suppliers who were offered but declined to quote should be submitted.
Purchases over £25,000	The Trust's tendering procedures must be applied. apply tendering procedures; where single supplier is justified (e.g., renewals), document rationale and obtain CFO approval.
Large purchases over Public Procurement Threshold	Regulated procurement must comply with statutory thresholds and advertising requirements (Find a Tender / Central Digital Platform).

ALET complies with the Procurement Act 2023 and, for procurements commenced before the Act's commencement, the Public Contracts Regulations 2015. Advertising is via Find a Tender / Central Digital Platform as applicable. Thresholds are inclusive of VAT under the Act; current sub-central thresholds (from Jan 2026) are £207,720 for goods/services and £5,193,000 for works; Light Touch Regime threshold £663,540. Procurements must not be artificially split to avoid thresholds; aggregation rules apply. Records of procurement decisions, evaluation and award must be retained.

5.3 Payments

BACS payments and associated paperwork must be authorised by two of the nominated bank mandate signatories. The BACS payment list must be authorised by the bank signatories prior to releasing payment.

5.4 Purchasing cards and credit cards

CFO oversees credit card issuance and use in line with ALET Credit Card Policy. Cards are for business use only; balances must be cleared to avoid interest. Receipts and coding are required; monthly reconciliations are

reviewed by the Transactional Finance Manager.

6 Payroll

6.1 Board of Directors

All Trust staff will be appointed to the salary scales approved by the Board and in accordance with appropriate conditions of service. All letters of appointment must be issued by the appropriate HR member.

If the academy is operating within budget, then the Academy Headteacher will have delegated authority to appoint staff within the approved establishment. If the Academy is in deficit, then this no longer applies.

Salaries and other benefits for senior management will be determined by the Board.

6.2 Wages and salaries

The Head of Human Resources is responsible for all payments of salaries and wages to all staff including payments for overtime or services rendered.

All contracts of service relating to employment shall be concluded in accordance with the Trust's approved HR practices and procedures and all offers of employment shall be made in writing by the appropriate HR member.

Senior Management is responsible for informing the HR team of any terminations and providing a letter of resignation where relevant. The HR team will complete termination forms for processing by the appointed Payroll subcontractor.

ALET HR maintains a Master Staff List accessible on the payroll portal. Some HR records are kept at individual Academies. These records are updated continually for starters, leavers and for changes in role, hours or salary.

All time sheets and other pay documents will be in a form prescribed or approved by the payroll subcontractor and ALET HR.

The Academy HR Manager will be responsible for keeping the Payroll subcontractor informed of all matters relating to personnel for payroll purposes. In particular these include:

- Appointments, resignations, dismissals, supervisions, secondments, and transfers.
- Absences from duty for sickness or other reason, apart from approved leave.
- Changes in remuneration other than normal increments and pay awards.
- Information necessary to maintain records of service for superannuation, income tax, and national insurance; and Visa checks where relevant in accordance with legislative requirements.

The payroll subcontractor shall prepare a reconciliation between the current months and the previous month's net salary payments showing adjustments made for new appointments, resignations, pay increases etc. This reconciliation should be reviewed and signed by ALET HR and authorised by the CEO.

The payroll contractor is responsible for payments to non-employees and for informing the appropriate authorities of such payments. All casual and part-time employees will be included on the payroll.

The payroll subcontractor shall be responsible for keeping all records relating to payroll including those of a statutory nature.

All payments must be made in accordance with the Trust's detailed payroll financial procedures and comply with HM Revenue & Customs requirements.

6.3 Pension schemes

The Board is responsible for undertaking the role of employer in relation to appropriate pension arrangements for employees.

The payroll subcontractor is responsible for day-to-day superannuation matters including:

- Paying of contributions to various authorised superannuation schemes.
- Preparing of the annual return to various superannuation schemes.
- Administering the institution's pension fund.

The School HR is responsible for administering eligibility to pension arrangements and for informing the Payroll subcontractor when deductions should begin or cease for staff.

6.4 Expenses

All claims for payment of subsistence allowances, travelling and incidental expenses shall be completed in a form approved by the HR team. Expenses are paid through payroll in the monthly payroll run.

Claims by members of staff must be authorised by their line manager. This certification shall be taken to mean that:

- The journeys were authorised.
- The expenses properly and necessarily incurred.
- The allowances are properly payable by the institution.
- Consideration has been given to value for money including in choosing the mode of transport.

All expenses must be in accordance with the Trust's expenses policy

6.5 Severance and other non-recurring payments

Severance payments shall only be made in accordance with relevant legislation and funding body guidance and under a scheme approved by the Board. Professional advice should be obtained where necessary. No amounts shall be expended which exceeds the budget allocated for the purpose. All such payments shall be authorised by the Chief Executive and calculations checked by the payroll subcontractor. In exceptional circumstances this approval may be given by the Chair in consultation with the Chief Executive, to be reported to the next meeting of the Board. Amounts paid should be declared in the financial statements in accordance with funding body guidance.

All matters referred to an employment tribunal shall be notified to the Board at the earliest opportunity in order that budget provision may be made as necessary. All determinations of tribunals must be similarly notified.

7 Cash and Banking

7.1 Appointment of bankers and opening of accounts

The Board is responsible for the appointment of the Trust's bankers and other professional financial advisers (such as investment managers).

The CFO and Transactional Finance Manager are responsible for liaising with the Trust's bankers in relation to the Trust's bank accounts.

7.2 Managing bank accounts

All cheques and other instruments authorising withdrawals from Trust bank accounts must bear

appropriate signatures in accordance with the authorised bank mandate.

The Transactional Finance must ensure bank statements are received regularly and that reconciliations are performed at least monthly. Reconciliation procedures must ensure that:

- All bank accounts are reconciled to the cash book.
- Reconciliations are prepared by a member of the Finance Team.
- Reconciliations are subject to an independent monthly review carried out by the Transactional Finance Manager; and
- Adjustments arising are dealt with promptly.

7.3 Appointment of bankers and opening of accounts

The Board is responsible for the appointment of the Trust's bankers and other professional financial advisers (such as investment managers).

All bank accounts shall be in the name of the Trust.

7.4 Petty cash

Petty cash payments are generally limited to £25 per transaction unless approved; supported by receipts; floats kept to minimum; max £1,000 per academy; boxes held in safes; reconciled at least quarterly and year-end certificates completed.

8 Treasury and Cashflow Management

8.1 Policy

The objectives of treasury management include:

- Providing a means by which the Trust can meet its commitments.
- Ensuring that sufficient sums are available at short or no notice to meet foreseeable requirements.
- Earning an acceptable rate of return on surplus funds without undue risk; and
- Spreading risk between differing types of investment and institutions.

8.2 Delegation and reporting

All executive decisions concerning borrowing, investment, or financing (within policy parameters) are the responsibility of the Chief Financial Officer.

All borrowing shall be undertaken in the name of the Trust and shall conform to any relevant funding body requirements, including any requirements for approval by the funding body.

Academy trusts must obtain the DfE's approval for borrowing (including finance leases for non-approved DfE Leased Assets and overdraft facilities) from any source, where such borrowing is to be repaid from grant monies or secured on assets funded by grant monies, and regardless of the interest rate chargeable. Credit cards must only be used for business expenditure, and balances cleared before interest accrues.

9 Assets and Inventory

9.1 General

Fixed assets include land/buildings; plant/machinery; furniture/equipment; IT; software; assets under construction. The Head of Finance maintains the Fixed Asset Register (description, cost, acquisition date, budget holder, location, useful life, disposal date and proceeds). Capital expenditure requires PO and CFO/Head of Finance approval.

9.2 Fixed asset register

The Head of Finance is responsible for holding and maintaining the Fixed Asset Register which will list of items (or specific group of items purchased within the accounting period) which require capitalisation in accordance with the Trust's accounting policies

The fixed asset register is to include:

- Description of asset
- Cost of Asset
- Date of acquisition
- Budget Holder for the asset
- Location of the asset
- Expected useful economic life of the asset
- Date of disposal or change of use
- Proceeds of disposal
- Security-mark the asset where practicable.

9.3 Inventories

The Leadership group members are responsible for maintaining inventories.

The Leadership group members are responsible for the fixed assets and other Trust property under their control. They will consult the Chief Financial Officer in any case where security is thought to be defective or where it is considered that special security arrangements may be needed.

Assets owned by the institution shall, so far as is practical, be effectively marked to identify them as institution property.

As directed by the Head of Finance, physical counts are undertaken against the Fixed Asset Register annually so far as practicable and the evidence presented to the Auditors.

Discrepancies between the physical count and the registers are investigated by the schools under the instruction of the Head of Finance. Any discrepancies over the value of £1,000 are reported to the Trust Board.

The Board will authorise the disposal of individual items of equipment and materials with an original purchase value of more than £5,000 and the Chief Financial Officer should authorise those with an individual value of less than £5,000.

10 Integrity and Openness

10.1 General

The Trust is committed to the highest standards of openness, integrity, and accountability. It seeks to conduct its affairs in a responsible manner, having regard to The Seven Principles of Public Life. All board and committee members and members of staff at all levels are expected to observe:

Selflessness: Holders of public office should take decisions solely in terms of the public interest. They should not do so to gain financial or other material benefits for themselves, their family, or their friends.

Integrity: Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.

Objectivity: Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

Accountability: Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

Openness: Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

Honesty: Holders of public office should be truthful.

Leadership: Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

Novel payments or other transactions are those of which the Trust has no experience or are outside the range of normal business activity for the Trust. Contentious transactions are those which might give rise to criticism of the trust by Parliament, and/or the public, and/or the media. The Trust will always refer novel and/or contentious transactions to the DfE for explicit prior authorisation in accordance with regulatory requirements.

10.2 Register of interests

It is important for anyone involved in spending public money to demonstrate that they do not benefit personally from the decisions they make. To avoid any misunderstanding that might arise all Trustees, governors and staff with significant decision making or spending powers are required to declare any business or financial interests they have in companies or individuals from which the Academy may purchase goods or services. The register is open to public inspection.

The Trust maintains a register of interests including relevant business and pecuniary interests of Board members, local governing committee members, senior employees and other staff with significant financial authority or influence. Relevant interests include:

- Directorships, partnerships, and employments with businesses that provide goods or services to the Trust and its Academies.
- Trusteeships and governorships at other educational institutions and charities irrespective of whether there is a trading relationship with the trust; and
- For each interest: the name of the business, the nature of the business, the nature of the interest, and the date the interest began.

This register will be open to public inspection with a copy on the Trust website.

Where Board members, local governing committee members, senior employees and other staff with significant financial authority or influence are connected (for example, parent, spouse, civil partner, cohabitee, and child) with relevant interests, these should be disclosed.

The register must be updated as necessary and at least once a year.

The existence of a register of interests does not, of course, detract from the duties of Board members, local governing committee members, and staff to declare interests whenever they are relevant to matters being discussed by the Board or local governing committee or any duly established committee. Where an interest has been declared, those involved should not attend that part of any committee or other meeting.

10.3 Connected parties

As well as demonstrating propriety in its relationships, the Trust will comply with the funding body's requirements and restrictions in transactions with "connected persons".

10.4 Receiving gifts or hospitality

The Bribery Act 2010 came into force on 1 July 2011. The Act introduced new offences for acts of bribery by individuals, or persons associated with relevant organisations. The penalties are severe for any employee convicted under the Act which could mean a criminal record with ten years imprisonment and unlimited fines.

The guiding principles to be followed by all members of staff must be:

- The conduct of individuals should not create suspicion of any conflict between their official duty and their private interest.
- The action of individuals acting in an official capacity should not give the impression (to any member of the public, to any organisation with whom they deal or to their colleagues) that they have been (or may have been) influenced by a benefit to show favour or disfavour to any person or organisation.

Thus, members of staff should not accept any gifts, rewards or hospitality (or have them given to members of their families) from any organisation or individual with whom they have contact in the course of their work that would cause them to reach a position whereby they might be, or might be deemed by others to have been, influenced in making a business decision as a consequence of accepting such hospitality. The frequency and scale of hospitality accepted should not be significantly greater than the institution would be likely to provide in return.

When it is not easy to decide between what is and is not acceptable in terms of gifts or hospitality, the offer should be declined, or advice sought from the relevant head of department. Guidance on acceptable hospitality is contained in the detailed financial procedures. For the protection of those involved, the Head of Compliance will maintain a register of gifts and hospitality received where the value is in excess of £50. Members of staff in receipt of such gifts or hospitality are obliged to notify the Head of Compliance promptly.

10.5 Fraud and corruption

It is the duty of all members of staff, management, and the Board to notify the Head of Governance and Compliance immediately whenever any matter arises which involves, or is thought to involve, irregularity, including fraud, corruption, or any other impropriety. The Trust fraud policy sets out the organisation's zero tolerance of fraud.

The Head of Governance and Compliance shall immediately invoke the fraud response plan. If the suspected fraud is thought to involve the Chief Executive Officer, the Head of Governance and Compliance shall notify the Chair of the Finance and Audit Committee direct of their concerns.

All instances of fraud or theft committed against the Trust, whether by employees or trustees or third parties, above £5,000 must be reported by the Trust to the funding body. (Lower thresholds may apply to certain categories of fraud e.g. bursary fraud.) Any unusual or systematic fraud, regardless of value, must also be reported.

10.6 Whistle blowing

Whistle blowing in the context of the Public Interest Disclosure Act is the disclosure by an employee (or other party) about malpractice in the workplace. A whistle blower can blow the whistle about crime, civil offences (including negligence, breach of contract etc.), miscarriage of justice, danger to health and safety or the environment or breach of the financial regulations and the cover up of any of these. It does not matter whether or not the information is confidential, and the whistle blowing can extend to malpractice occurring in the UK and any other country or territory.

Normally, any concern about a workplace matter should be raised with the relevant member of staff's immediate line manager or head of department. However, the Trust recognises that because of the

seriousness or sensitivity of some issues, together with the knowledge of whom the member of staff thinks may be involved, may make this difficult or impossible.

A member of staff may, therefore, make the disclosure to one of the staff designated for this purpose, for example the Head of Governance and Compliance. If the member of staff does not wish to raise the matter with the Head of Governance and Compliance or the Chair of the Board, it may be raised with the Chair of the Finance and Audit Committee.

The full procedure for whistle blowing is set out in the Trust Whistleblowing Policy.

10.7 Severance payments

Severance payments shall only be made in accordance with relevant legislation and funding body guidance including the Academy Trust Handbook.

Professional advice should be obtained where necessary.

All such payments shall be authorised by the Chief Executive Officer.

Any individual amounts which do not fall within the parameters above or are more than £20,000 require approval by the Board.

Where the Trust is considering severance payments in excess of the statutory or contractual entitlement by the threshold set by the funding body (£50,000 by the funding body in the Academy Trust Handbook 2025), prior approval must be sought from HM Treasury via the funding body.

11 Other Matters

11.1 Insurance

The Chief Financial Officer is responsible for the Trust's insurance arrangements, including the provision of advice on the types of cover available. As part of the overall risk management arrangements, the Trust will review all risks annually with a centrally agreed insurance provider and at all times in the light of specialist professional advice, to ensure that the sums insured are commensurate with the risks. This portfolio of insurances will be considered and approved by finance and audit committee on an annual basis.

The Chief Financial Officer is responsible for effecting insurance cover as agreed by the Board. He or she is therefore responsible for obtaining quotes, negotiating claims, and maintaining the necessary records. The Head of Finance will keep a register of all insurances effected by the Trust and the property and risks covered. He/she will also deal with the Trust's insurers and advisers about specific insurance problems.

It is the responsibility of each Academy and other location to inform the Trust of all new risks, property equipment and vehicle, which require insurance or of any real or potential situations which require alterations to existing insurance policies. Each location has the responsibility of ensuring that Trust property such as musical instruments or computers are insured when off site.

All Academy and other locations shall display such notices regarding insurances as shall be required by statute the statement of Employer's Liability Insurance. At no time shall any location give any indemnity to any third party without the written consent of the insurers.

APPENDIX A:

FRAUD POLICY AND RESPONSE PLAN

FRAUD POLICY

Background

1. This Trust has a commitment to high legal, ethical, and moral standards. All members of staff are expected to share this commitment.
2. The Board is committed to strong internal financial control and has procedures in place that reduce the likelihood of fraud occurring. These include Financial Regulations and documented procedures. In addition, the Board seeks to promote that a risk and fraud awareness culture exists in the Trust.
3. This document, together with the Fraud Response Plan is intended to provide direction and help to those who find themselves having to deal with suspected cases of theft, fraud, or corruption. These documents give a framework for a response and advice and information on various aspects and implications of an investigation. Policy statement
4. The Fraud Policy and the Fraud Response Plan apply to any irregularity, or suspected irregularity, involving employees as well as consultants, vendors, contractors, and/or any other parties with a business relationship with the Trust. Any investigative activity required will be conducted without regard to any person's relationship to the Trust, position, or length of service. Actions constituting fraud
5. The Fraud Act 2006 defines fraud in terms of three classes: false representation, failure to disclose information and abuse of position introduces. In all three cases, fraud involves dishonest acts with the intent of gain for the perpetrator (or another party) or of inflicting loss (or risk of loss) on another.
6. The Bribery Act 2010 introduces criminal offences of offering, promising, or giving of an advantage and of requesting, agreeing to receive, or accepting an advantage. These are forms of fraud and corruption.
7. All managers have a duty to familiarise themselves with the types of improprieties that might be expected to occur within their areas of responsibility and to be alert for any indications or irregularity.

The Trust's commitment

8. The Board is absolutely committed to maintaining an honest, open, and well-intentioned atmosphere within the Trust. It is therefore also committed to the elimination of any fraud within the Trust, and to the rigorous investigation of any such cases.
9. The Board wishes to encourage anyone having reasonable suspicions of fraud to report them. Therefore, it is also the Board's policy, which will be rigorously enforced, that no employee will suffer in any way because of reporting reasonably held suspicions.
10. All members of staff can therefore be confident that they will not suffer in any way because of reporting reasonably held suspicions of fraud. For these purposes reasonably held "suspicions" shall mean any suspicions other than those, which are raised maliciously and found to be groundless. The Trust will deal with occurrences in accordance with the Public Interest Disclosure Act. Review and revision of this Policy
11. This Policy will be reviewed on a three-year cycle.
12. If the Board's review of risk management or other factors require changes before the next scheduled policy review, the review will be brought forward.

FRAUD RESPONSE PLAN

Purpose

1. The purpose of this plan is to define authority levels, responsibilities for action, and reporting lines in the event of a suspected fraud or irregularity. The use of the plan should enable the institution to:

- Prevent further loss · establish and secure evidence necessary for criminal and disciplinary action
- Notify the Trust's funding body as appropriate
- Recover losses
- Punish the culprits
- Deal with requests for references for employees disciplined or prosecuted for fraud
- Review the reasons for the incident, the measures taken to prevent a recurrence, and any action needed to strengthen future responses to fraud
- Keep all personnel with a need to know suitably informed about the incident and the institution's response
- Inform the police · assign responsibility for investigating the incident
- Establish circumstances in which external specialists should be involved
- Establish lines of communication with the police.

2. These matters are dealt with below.

Initiating action

3. Suspicion of fraud or irregularity may be captured through several means, including the following:

- Requirement on all staff to report fraud or irregularity to the CEO
- Public interest disclosure procedure.
- Planned audit work; and
- Operation of proper procedures.

4. All actual or suspected incidents should be reported without delay to the Head of the Internal Audit Service and the Chair of the Audit Committee.

5. The Chair of the Audit Committee should determine with the Headteacher whether the actual or suspected incidents will be investigated by Trust staff or other specialists.

Where there is a requirement to notify the funding body, the Trust will not commission an investigation until the Chief Executive of the funding body has been informed and agreed the most appropriate course of action.

Preventing further loss

6. Where initial investigation provides reasonable grounds for suspecting a member or members of staff of fraud, senior management will decide how to prevent further loss. This may require the suspension, with or without pay, of the suspects. It may be necessary to plan the timing of suspension to prevent the suspects from destroying or removing evidence that may be needed to support disciplinary or criminal action.

7. In these circumstances, the suspect(s) should be approached unannounced. They should always be supervised before leaving the Trust's premises. They should be allowed to collect personal property under supervision but should not be able to remove any property belonging to the Trust. Any security passes and keys to premises, offices and furniture should be returned.

8. Relevant premises and IT managers shall be required to advise on the best means of denying access to the Trust, while suspects remain suspended (for example by changing locks and informing security staff not to admit the individuals to any part of the premises). Similarly, the head of IT/Networks should be instructed to withdraw without delay access permissions to the Trust's computer systems.

9. Senior management shall consider whether it is necessary to investigate systems other than that which has given rise to suspicion, through which the suspect may have had opportunities to misappropriate the Trust's assets. This issue will also be subsequently considered by the Audit Committee.

Establishing and securing evidence

10. A major objective in any fraud investigation will be the punishment of the perpetrators, to act as a deterrent to other personnel. The Trust will follow disciplinary procedures against any member of staff who has committed fraud. The Trust will normally pursue the prosecution of any such individual.

11. Those investigating the actual or suspected incidents will:

- Maintain familiarity with the Trust's disciplinary procedures, to ensure that evidence requirements will be met during any fraud investigation.
- Ensure that staff involved in fraud investigations are familiar with and follow rules on the admissibility of documentary and other evidence in criminal proceedings.

Interviewing

12. The interviews need to be carried out with a degree of formality with the recognition that potentially something could later become court evidence. The following minimum requirements must be adhered to:

- All interviews should be conducted in an appropriate setting
- All interviews should be conducted in the presence of two people
- Extreme care should be taken to avoid making allegations
- Notes must be taken during the interview, signed statements should be obtained where possible
- The individual may be accompanied by a Trade Union representative or work colleague of their choosing

· Protocols of the Disciplinary Procedure should be followed notifying the funding body

13. The Trust will comply with any requirement to inform the Trust's funding body of all significant cases of fraud or suspected fraud or irregularity. Recovery of losses

14. Recovering losses is a major objective of any fraud investigation. The Audit Committee shall ensure that in all fraud investigations, the amount of any loss will be quantified. Repayment of losses should be sought.

15. Where the loss is substantial, legal advice should be obtained without delay about the need to freeze the suspect's assets through the court, pending conclusion of the investigation. Legal advice should also be obtained about prospects for recovering losses through the civil court, where the perpetrator refuses repayment. The Trust would normally expect to recover costs in addition to losses. References for employees disciplined or prosecuted for fraud

16. The staff handbook includes a requirement that any request for a reference for a member of staff who has been disciplined or prosecuted for fraud shall be referred to the personnel officer. The Director of Human Resources shall prepare any answer to a request for a reference having regard to employment law.

¹ The Academy Trust Handbook 2025 states: The trust must notify the DfE, as soon as is operationally practical based on its particular circumstances, of any instances of fraud or theft exceeding £5,000 individually, or £5,000 cumulatively in any 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 why if not); and
- Whether insurance cover or the risk protection arrangements have offset any loss.

Reporting to governors

17. All actual or suspected incidents should be reported without delay to Chair of the Audit Committee. The Chair of the Board should also be informed.

18. Any variation from the approved fraud response plan, together with reasons for the variation, shall be reported promptly to the Chairs of both the Board and the Audit Committee.

19. On completion of a special investigation, a written report shall be submitted to the Audit Committee and External Audit containing:

- A description of the incident, including the value of any loss, the people involved, and the means of perpetrating fraud
- The measures taken to prevent a recurrence
- Any action needed to strengthen future responses to fraud, with a follow-up report on whether the actions have been taken.

20. This report will normally be prepared by those who undertook the investigation.