

<b>I – FINANCIAL REGULATIONS</b> (p3)	<b>II - PROBITY &amp; WHISTLEBLOWING</b> (p42)	<b>III - CHARGES &amp; REMISSIONS</b> (p59)	<b>IV - BEST VALUE</b> (p61)
<b>V - ICT DISASTER RECOVERY</b> (p63)	<b>VI – LETTINGS</b> (p65)	<b>VII - FREEDOM OF INFORMATION</b> (p73)	

## VISION - Creating Futures for All

We are a learning community which creates chances for dreamers, idea makers and innovators to connect, thrive and outperform. We empower our children to use their skills as divergent thinkers, responsible role models and leaders to carve out their own futures, and become extraordinary citizens.

We are passionate that all schools in our family are free to follow their own destinies based on the needs and aspirations of their investors. Our uniqueness and different strengths ensures that our communities grow and prosper and that we have opportunities to support and learn from each other as we create futures for all.

## Inclusion and safeguarding statement

At the Synaptic Trust all children are valued inspired and respected within our happy, welcoming Academy community.

We set high expectations for all our children. Practitioners give every child the opportunity to experience success in their learning, by providing a relevant and challenging curriculum with an emphasis on personalised learning.

Our Trust is committed to safeguarding and promoting welfare of children and expects staff to share this commitment.



## APPENDICES

Appendix A	Guidance for issue to Responsible Officers
Appendix B	Record of financial responsibility
Appendix C	The Seven Principles of Public Life
Appendix D	Fraud: Definitions
Appendix E	Whistleblowing Policy
Appendix F	Declaration of Pecuniary Interests
Appendix G	The Register of Pecuniary Interests
Appendix H	Declaration of gifts and hospitality received
Appendix I	Scheme of Delegation to Local Governing Bodies



## I – Financial Regulations

### Contents

1. Introduction
2. Organisation
3. Accounting System
4. Financial Planning
5. Payroll
6. Purchasing
7. Income
8. Cash Management including use of a School Credit Card
9. Fixed Assets
10. Tax
11. Audit
12. Insurance
13. Bad Debts



## 1. Introduction

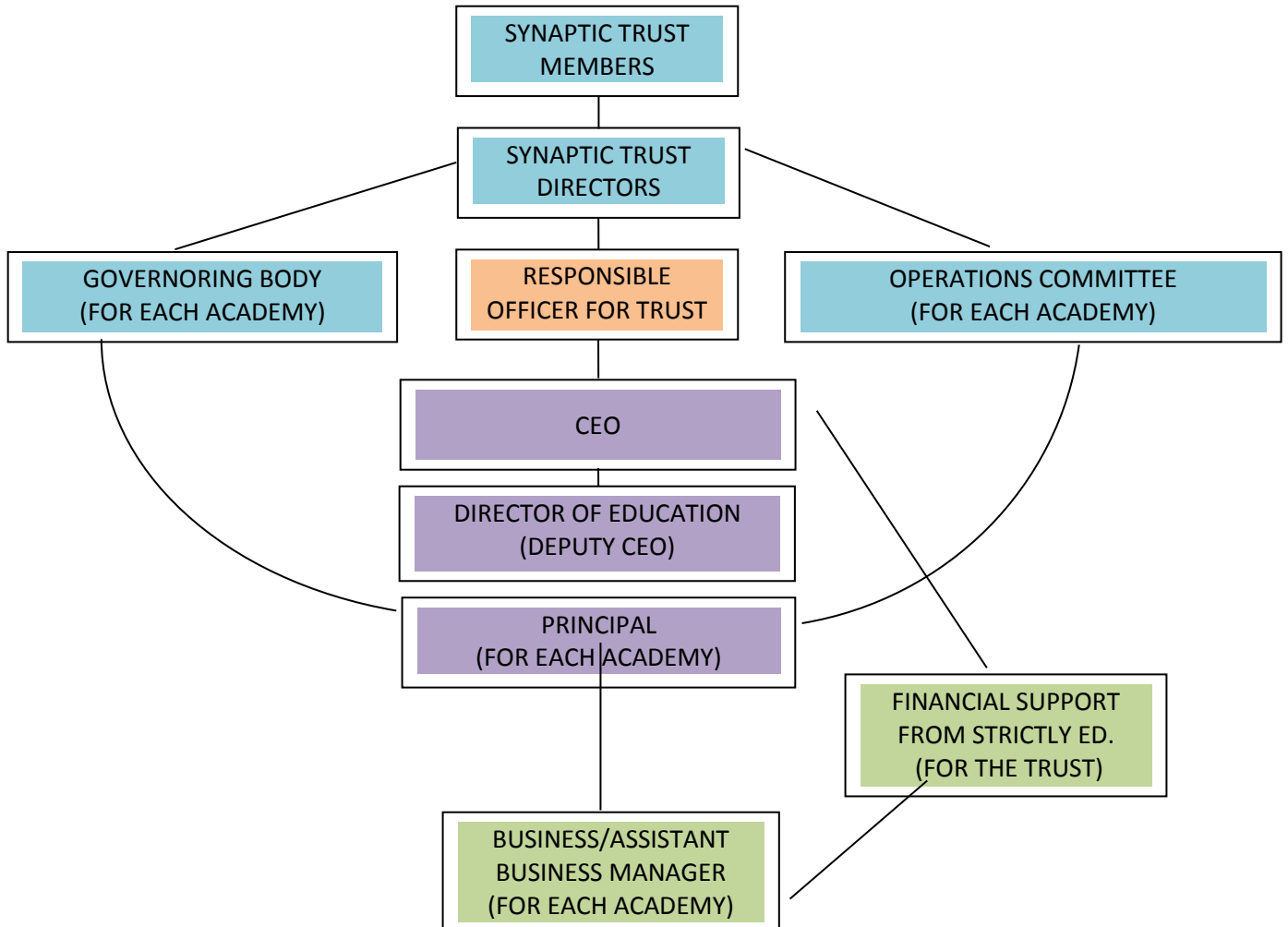
The purpose of this manual is to ensure that the Academy maintains and develops systems of financial control which conform to the requirements both of propriety and of good financial management. It is essential that these systems operate properly to meet the requirements of our Funding Agreement with the Department for Education (DfE)/Education Skills and Funding Agency (ESFA).

The Academy must comply with the principles of financial control outlined in the academies guidance published by the DfE/ESFA. This manual expands on that and provides detailed information on the Academy's accounting procedures and system manual should be read by all staff involved with financial systems.



## 2. Organisation (See Governance section for more detail)

The Trust has defined the responsibilities of each person involved in the administration of Academy finances to avoid the duplication or omission of functions and to provide a framework of accountability for Directors, Governors and staff. The financial reporting structure is illustrated below:





## The Trust and the Governing Bodies

The Trust has overall responsibility for the administration of the Trust's finances. The main responsibilities are prescribed between the Funding Agreement and the Synaptic Trust. The Directors will be responsible for the appointment of the CEO, Principal and Director of Business and Finance.

The main responsibilities of each Governing Body are prescribed in the Academy's scheme of government. The main responsibilities include:

- Ensuring that grant from the ESFA (given to the Trust) is used only for the purposes intended;
- Approval of the Annual Budget to be submitted to the Trust;
- Appointment of the other senior leaders and the Director of Business and Finance, in conjunction with the CEO;
- Authorising virements over £50,000;
- Authorising the award of contracts (tenders) over £100,000; and
- Authorising the disposal of assets, in conjunction with the Operations Committee, with an original purchase price excess of £20,000

## The Operations Committee

The Operations Committee is a committee of the Governing Body in each Academy. The Operations Committee meets at least once a term but more frequent meetings can be arranged if necessary.

The main responsibilities of the Operations Committee are detailed in written terms of reference which have been authorised by the Board of Directors. The main one being to consider and make recommendations to the Governors on all financial and budgetary matters not delegated either to the Principal or to the Board of Directors, including:

- The preparation of the annual budget for the Academy (to be submitted to the Trust for agreement) and of any periodic review of budget monitoring reports;
- Approval of procedures for competitive tendering decisions on expenditure items above £50,000;
- Acceptance of tenders for goods, services or works above the value of £50,000, authorising contracts between £25,000 and £100,000;
- Approval of arrangements to secure compliance with financial regulations;
- Ensuring the annual accounts are produced in accordance with the requirements of the Companies Act 1985 and the DfE guidance issued to academies (in preparation for audit);
- Reviewing the reports of the Responsible Officer and External Auditors on the effectiveness of the financial procedures and controls; and
- Authorising the disposal of assets with an original purchase price between £5,001-£20,000

## Accounting Officer

Each Academy Trust must designate a named individual as its Accounting Officer. The individual must be a fit and suitable person for role. In multi-Academy Trusts, it should be the CEO of the Trust.

Whilst the CEO has responsibility, under the board's guidance, for the Trust's overall management and staffing, their appointment as Accounting Officer confers specific responsibilities for financial



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

The essence of the role is a personal responsibility for:

**regularity** - dealing with all items of income and expenditure in accordance with legislation, the terms of the Trust's funding agreement and this Handbook, and compliance with internal Trust procedures. This includes spending public money for the purposes intended by Parliament;

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

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

The Accounting Officer also has responsibilities for keeping proper financial records and accounts, and for the management of opportunities and risks.

Whilst the Accounting Officer is accountable for the Academy Trust's financial affairs, the delivery of the Trust's detailed accounting processes will be delegated to a chief financial officer (CFO), who will perform the role of Director of Business and Finance.

The Accounting Officer must advise the board of Trustees in writing if, at any time, in his or her opinion, any action or policy under consideration by them is incompatible with the terms of the Handbook or FA. Similarly, the Accounting Officer must advise the board in writing if the board appears to be failing to act where required to do so by the terms and conditions of the Handbook or FA. Where the board of Trustees is minded to proceed, despite the advice of the Accounting Officer, the Accounting Officer must consider the reasons the board gives for its decision. If, after considering the reasons given by the board, the Accounting Officer still considers that the action proposed by the board is in breach of the Handbook or FA, the Accounting Officer must advise the ESFA's Accounting Officer of the position in writing.

### **CEO/ Principals**

Within the framework of the Improvement Plan as approved by the Governing Body the Principal has overall executive responsibility for the Academy's activities including financial activities. Much of the financial responsibility has been delegated to the Director of Business and Finance and Business Manager/Assistant Business Manager but the Principal still retains responsibility for:

- Approving new staff appointments within the authorised establishment, except for any senior staff posts (e.g. Deputy Headteachers/Assistant Headteachers which the Governing Body have agreed should be approved by them);
- Authorising contracts between £1,000 and £25,000 in conjunction with the Director of Business and Finance/Business Manager/Assistant Business Manager – which can be agreed retrospectively in exceptional circumstances;
- Authorising BACS payments and signing cheques in conjunction with the Director of Business and Finance/Business Manager/Assistant Business Manager or other authorised signatory; and



- Authorising virements up to £50,000 in conjunction with the Director of Business and Finance/Business Manager/Assistant Business Manager and reporting to the Operations Committee

### **Strictly Education Financial Support**

Provide strategic advice and support to the Board of Directors and each Governing Body, CEO, Principals and the wider leadership team. Oversee, maintain and develop systems relating to Finance, Human Resources, Administration and Facilities Management across the Synaptic Trust. Lead all operational aspects of the school to ensure the sites effectively support the educational aims of the Trust, each Governing Body and Leadership Team. Ensure all school resources both human and material are used efficiently and effectively.

### **Business/Assistant Business Manager**

The Business Manager/Assistant Business Manager works in close collaboration with the Principal and the Director of Business and Finance through whom he or she is responsible to the governors. The Business Manager/Assistant Business Manager also has direct access to the governors via the Operations Committee and is expected to attend all of the Operations Committee meetings. The main responsibilities of the Business Manager/Assistant Business Manager are:

- The day to day management of financial issues including the establishment and operation of a suitable accounting system;
- The management of the Academy financial position at a strategic and operational level within the framework for financial control determined by the Governing Body; The maintenance of effective systems of internal control;
- Ensuring that the annual accounts are properly presented and adequately supported by the underlying books and records of the School;
- The preparation of monthly management accounts;
- Authorising orders below £5,000 in conjunction with budget holders;
- Authorising orders between £5,001 and £50,000, above this amount in conjunction with the CEO/ Principal or Director of Business and Finance;
- Authorising BACS payments and signing cheques in conjunction with the CEO/ Principal/Director of Business and Finance or other authorised signatory;
- Ensuring forms and returns are sent to the ESFA in line with the timetable in the DfE/ESFA guidance.

### **The Responsible Officer**

The Responsible Officer (RO) is appointed by the Trust and provides governors with an independent oversight of the Academy's financial affairs. The main duties of the RO are to provide the Governing Body with independent assurance that:

- The financial responsibilities of the Governing Body are being properly discharged;
- Resources are being managed in an efficient, economical and effective manner;
- Sound systems of internal financial control are being maintained; and
- Financial considerations are fully taken into account in reaching decisions.

The Responsible Officer will undertake a termly programme of reviews to ensure that financial transactions have been properly processed and that controls are operating as laid down by the Governing Body. A report of the findings from each visit will be presented to the Operations Committee and to the Director of Business and Finance, who will inform the Accounting Officer and the Board of Directors of any short comings. Detailed guidance on the transactions to be checked by the RO is given in Appendix A.





### **Auditors**

Audit requirements - Academy Trusts are subject to audit and review to give assurance to Parliament and the public that public funds are being used for the purpose intended. Academy Trusts are required by law to produce audited accounts, the members of the Trust must appoint statutory auditors who are registered under the requirements of the Companies Act, to conduct an audit (which is in compliance with the requirements of the Companies Act) and certify whether the accounts are “true and fair”. Included in the Annual Report and Financial Statements are the Governors Report, the Governance Statement, the Statement on Regularity, Propriety and Compliance, Statement of Governors Responsibilities, Independent Auditors Report to the members of the Synaptic Trust and Statement of Financial Activities (including income and expenditure account and statement of recognised gains and losses). Auditors are appointed by the Board of Directors annually.

### **Other Staff**

Other members of staff, primarily the Finance Officer and budget holders, will have some financial responsibility. All staff are responsible for the security of School property, for avoiding loss or damage, for ensuring economy and efficiency in the use of resources and for conformity with the requirements of the Academy’s financial procedures and the Financial Probity policy.

### **Register of Interests**

See Financial Probity.



### 3. Accounting System

All the financial transactions of the Academy must be recorded on the PS Financials accounting system.

#### System Access

Entry to PS Financials is password restricted and the Director of Business and Finance is responsible for implementing a system which ensures that passwords are changed at least every 3 months (across all Academies).

Access to the component parts of PS Financials can also be restricted and the Director of Business and Finance is responsible for setting access levels for all members of staff using the system.

#### Back-up Procedures

Back-up procedures are described in the ICT Disaster Recovery section of this policy.

The Business Manager/Assistant Business Manager should also prepare a disaster recovery plan in the event of loss of accounting facilities or financial data. This should link in with the annual assessment made by governors of the major risks to which the Academy is exposed and the systems that have been put in place to mitigate those risks.

#### Transaction Processing

All transactions input to the accounting system must be authorised in accordance with the procedures specified on the Record of Financial Responsibility.

Detailed information on the operation of the accounting system can be found in the user manuals held by the Director of Business and Finance.

#### Transaction Reports

The Business Manager/Assistant Business Manager will obtain and review system reports to ensure that only regular transactions are posted to the accounting system. The report obtained and reviewed will include:

- Master file amendment reports for the payroll, purchase ledger and sales ledger;
- Management accounts summarising expenditure and income against budget at budget holder level; and
- Other reports as required.

#### Reconciliations

The Business Manager/Assistant Business Manager is responsible for ensuring the following reconciliations are performed each month, and that any reconciling or balancing amounts are cleared:

- Any unusual or long outstanding reconciling items must be brought to the attention of the Director of Business and Finance. The Business Manager/Assistant Business Manager will review and sign all reconciliations as evidence of their review.



## 4. Financial Planning

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 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 School and the planned use of those resources for the following year.

The development planning process and the budgetary process are described in more detail below.

### School Evaluation and Improvement Planning

Improvement Planning takes place annually and draws upon the evaluation of the Academy's current performance as well as upon likely internal and external changes that affect the Academy. The evaluation outlines several areas for development over coming years; more detailed plans show what aspects are being tackled in the current year.

Improvement Planning is also informed by budgetary considerations and significant financial costs are indicated in the Plans and cross-referenced in the Budget. The Improvement Plan and the Annual Budget are considered and approved by the Governing Body at the same meeting, but the process is continuous and subject to constant evaluation and review. The annual cycle of evaluation and development planning is as follows:

#### Autumn Term

New Academy Budget and new Improvement Plan comes into effect.

Teachers, Appraisal Reviews are informed by identified Academy needs and, in turn, inform future training needs.

Governing Body sets targets for end of Key Stage 2.

#### Spring Term

Publication of ASP online data informs evaluation and future actions

Evaluation of current Plans and Actions by (a) Leadership Team and (b) the Strategic Planning Committee.

Initial work on the draft Budget Plan for next Academy year.

#### Summer Term

Evaluation of current Plans and Actions by (a) Leadership Team and (b) Governors Strategic Planning Committee.

Performance Review lesson observation data available to inform evaluations.

New School Budget Plan finalised and approved by Governing Body.

New School Improvement Plan finalised and approved by Governing Body.

#### Annual Budget



## Consolidated Synaptic Trust Budget

The Director of Business and Finance and the CEO are responsible for preparing and obtaining approval for the annual budget. The budget must be approved by the Directors of the Trust. The approved budget must be submitted to the ESFA by 31<sup>st</sup> July each year and the Director of Business and Finance is responsible for establishing a timetable which allows sufficient time for the approval process and ensures that the submission date is met. The annual budget will reflect the best estimate of the resources available to the Trust for the forthcoming year and will detail how those resources are to be utilised.

## The Academy Budgets

The Business Manager/Assistant Business Manager and Principal with assistance from the Director of Business and Finance will set individual Academy Budgets, in conjunction with the Operations Committees of each Academy. Each budget must be approved by the Full Governing Body of each Academy in preparation for submission to the Trust.

There should be a clear link between the development plan priorities and the budgeted utilisation of resources.

The budgetary planning process will incorporate the following elements:

- Forecasts of the likely number of pupils to estimate the amount of ESFA grant receivable;
- Review of other income sources available to the Academy to assess likely level of receipts;
- Review of past performance against budgets to promote an understanding of the Academy cost base;
- Identification of potential efficiency savings; and
- Review of the main expenditure headings in light of the Improvement Plan priorities and the expected variations in cost e.g. pay increases, inflation and other anticipated changes.

## Balancing the Budget for each Academy

Comparison of estimated income and expenditure will identify any potential surplus or shortfall in funding. If shortfalls are identified, opportunities to increase income should be explored and expenditure headings will need to be reviewed for areas where cuts can be made. This may entail prioritising tasks and deferring projects until more funding is available. Plans and budgets will need to be revised until income and expenditure are in balance. If a potential surplus is identified, this may be held back as a contingency or alternatively allocated to areas of need.

## Finalising the Budget for each Academy

As Directors have ultimate responsibility for every academy, once agreed by Governors the budget will be presented to Directors for their final approval. Academies should aim to set an in-year balanced budget. If Principals and the Operations Committee decide to set a deficit budget for the year, they will first discuss this proposal with the CEO and Director of Business and Finance before seeking the approval of their FGB.

The budget should be accompanied by a statement of assumptions and hierarchy of priorities so that if circumstances change, it is easier for all concerned to take remedial action. The budget should be seen as a working document which may need revising throughout the year as circumstances change.

## Monitoring and Review for each Academy



Monthly reports will be prepared by the Business Manager/Assistant Business Manager. The reports will detail actual income and expenditure against budget both for budget holders and at a summary level for the Principal and the Operations Committee. The accounting system will not allow payments to be made against an overspent budget without the approval of the Business Manager/Assistant Business Manager and the Principal (which must be reported to the Operations Committee).

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. If a budget overspend is forecast it may be appropriate to vire money from one budget, or from the contingency.

The Governing Body of each Academy is responsible for authorisation of all virements in excess of £50,000 between budget headings. Details of all virements will be reported to the Operations Committee.



## 5. Payroll

The main elements of the payroll system are:

- Staff appointments; and
- Payroll administration and Payments.

### Staff Appointments

The Governing Body must approve a staffing structure for the Academy every year. The Operations Committee must ensure that adequate budgetary provision exists for any staffing changes.

### Payroll Administration

The Academy payroll is administered by an outside contractor, and payroll transactions are entered/imported to PS Financials. Access to the system is password controlled. Password control procedures and backup arrangements are described in section two of this manual.

All staff are paid monthly through Payroll.

### Payments

All salary payments are made by BACS.

The Business Manager/Assistant Business Manager should prepare a reconciliation between the current month's and the previous month's gross salary payments showing adjustments made for new appointments, resignations, pay increases etc. This reconciliation should be reviewed and signed by the Academy Principal.

The payroll system automatically calculates the deductions due from payroll to comply with current legislation. The major deductions are for tax, National Insurance contributions and pensions.

The Business Manager/Assistant Business Manager should select one employee at random each month and check the calculation of gross to net pay to ensure that the payroll system is operating correctly. All staff salary payments are reconciled to the budget allocated and actual generated by SIMS.

After the payroll has been processed the nominal ledger will be automatically updated. Postings will be made both to the payroll control account and to individual cost centres. The Business Manager/Assistant Business Manager should review the payroll control account each month to ensure the correct amount has been posted from the payroll system, individual cost centres have been correctly updated and to identify any amounts posted to the suspense account.

On annual basis the Business Manager/Assistant Business Manager must check for each member of staff that the gross pay per the payroll system agrees to the contract of employment held on the personnel file.



## 6. Purchasing

The Academy wants to achieve the best value for money from all our purchases. This means obtaining the correct quality, quantity and time at the best price possible. A large proportion of purchases will be paid for with public funds and they need to maintain the integrity of these funds by following the general principles of:

- **Probity**, it must be demonstrable that there is no corruption or private gain involved in the contractual relationships of the School;
- **Accountability**, the Academy is publicly accountable for its expenditure and the conduct of its affairs; and
- **Fairness**, that all those dealt with by the Academy are dealt with on a fair and equitable basis.

### Routine Purchasing

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

All orders must be made, or confirmed, in writing using an official order form. Orders must bear the signature of the CEO/Principal/Director of Business and Finance and must be forwarded to the Business Manager/Assistant Business Manager to countersign the order.

Countersigned orders are recorded, allocated a reference number and dispatched to the supplier by the Business Manager/Assistant Business Manager.

Office staff must make appropriate arrangements for the delivery of goods to the Academy. On receipt the office staff must undertake a detailed check of the goods received against the goods received note (GRN) and make a record of any discrepancies between the goods delivered and the GRN. Discrepancies should be discussed with the supplier of the goods without delay.

If any goods are rejected or returned to the supplier because they are not as ordered or are of sub-standard quality, the Business Manager/Assistant Business Manager will keep a central record of all goods returned to suppliers.

All invoices should be sent to the Business Manager/Assistant Business Manager in a timely manner.

The Business Manager/Assistant Business Manager will then input the invoices into PS Financials.

At the end of every week or more often if required, the Business Manager/Assistant Business Manager will review the invoices due for payment. BACS payments will be processed or cheques will be raised, the BACS payment or cheques are authorised by two of the nominated bank signatories.

Remittances advices are e-mailed to suppliers. Cheques will be dispatched to suppliers by the Business Manager/Assistant Business Manager.

At least two written quotations should be obtained for all orders between £1,000 and £5,000 to identify the best source of the goods/services. At least 3 written quotes should be sought **and** the lowest tender accepted for items of expenditure between £5,000 and £50,000. Written details of



quotations obtained should be prepared and retained by the Business Manager/Assistant Business Manager for audit purposes.

Any individual training over £10,000 must be agreed by the Operations Committee of the relevant Academy.

All goods/services ordered with a value over £50,000, or for a series of contracts which in total exceed £50,000 must be subject to formal tendering procedures. Competitive tendering can be considered below this figure, in the interests of best value. Purchases over (currently £156,442 for goods and services, and £3,927,260 for works) (correct as at May 2011), may fall under EU procurement rules which require advertising in the Official Journal of the European Union.

### Authorisation Limits

All purchase order forms regardless of value must be authorised by the relevant person as follows:

£1 to £25,000	CEO/Principal/Director of Business and Finance
Greater than £25,000	Operations Committee approval
Greater than £100,000	Full Governing Body approval
Greater than £200,000	Board of Directors approval

### Forms of Tenders

There are three forms of tender procedure: open, restricted and negotiated and the circumstances in which each procedure should be used are described below.

#### **Open Tender:**

This is where all potential suppliers are invited to tender. The budget holder must discuss and agree with the Business Manager/Assistant Business Manager how best to advertise for suppliers e.g. general press, trade journals or to identify all potential suppliers and contact directly if practical. This is the preferred method of tendering, as it is most conducive to competition and the propriety of public funds.

#### **Restricted Tender:**

This is where suppliers are specifically invited to tender.

Restricted tenders are appropriate where:

- There is a need to maintain a balance between the contract value and administrative costs;
- A large number of suppliers would come forward or because the nature of the goods are such that only specific suppliers can be expected to supply the Academy's requirements; and
- The costs of publicity and advertising are likely to outweigh the potential benefits of open tendering.

#### **Negotiated Tender:**

The terms of the contract may be negotiated with one or more chosen suppliers.

This is appropriate in specific circumstances:

- The above methods have resulted in either no or unacceptable tenders;
- Only one or very few suppliers are available;
- Extreme urgency exists; and





- Additional deliveries by the existing supplier are justified.

### **Preparation for Tender**

Full consideration should be given to:

- Object of tender;
- Overall requirements;
- Technical skills required;
- After sales service requirements; and
- Form of contract.

It may be useful after all requirements have been established to rank requirements (e.g. mandatory, desirable and additional) and award marks to suppliers on fulfilment of these requirements to help reach an overall decision.

### **Invitation to Tender**

If a restricted tender is to be used then an invitation to tender must be issued. If an open tender is used an invitation to tender may be issued in response to an initial enquiry.

An invitation to tender should include the following:

- Introduction/background to the project;
- Scope and objectives of the project;
- Technical requirements;
- Implementation of the project;
- Terms and conditions of tender; and
- Form of response.

### **Aspects to Consider:**

#### ***Financial***

- Like should be compared with like and if a lower price means a reduced service or lower quality this must be borne in mind when reaching a decision.
- Care should be taken to ensure that the tender price is the total price and that there are no hidden or extra costs.
- Is there scope for negotiation?

#### ***Technical/Suitability***

- Qualifications of the contractor
- Relevant experience of the contractor
- Descriptions of technical and service facilities Certificates of quality/conformity with standards Quality control procedures
- Details of previous sales and references from past customers

#### ***Other Considerations***

- Pre sales demonstrations
- After sales service
- Financial status of supplier



- Supplier in financial difficulty may have problems completing contracts and in the provision of after sales service. It may be appropriate to have an accountant or similarly qualified person examine audited accounts etc.

### **Tender Acceptance Procedures**

The invitation to tender should state the date and time by which the completed tender document should be received by the School. Tenders should be submitted in plain envelopes clearly marked to indicate they contain tender documents. The envelopes should be time and date stamped on receipt and stored in a secure place prior to tender opening. Tenders received after the submission deadline should not normally be accepted.

### **Tender Opening Procedures**

All tenders submitted should be opened at the same time and the tender details should be recorded. Two persons should be present for the opening of tenders as follows:

- For contracts up to £25,000 - two of the budget holder, the Business Manager/Assistant Business Manager or the CEO/Principal; and
- For contracts over £25,000 – either the Business Manager/Assistant Business Manager or the Principal plus a member of the Operations Committee (or the Chair of Governors).

A separate record should be established to record the names of the firms submitting tenders and the amount tendered. This record must be signed by both people present at the tender opening.

### **Tendering Procedures**

The evaluation process should involve at least two people. Those involved should disclose all interests, business and otherwise, that might impact upon their objectivity. If there is a potential conflict of interest then that person must withdraw from the tendering process.

Those involved in making a decision must take care not to accept gifts or hospitality from potential suppliers that could compromise or be seen to compromise their independence. Full records should be kept of all criteria used for evaluation and for contracts over £25,000 a report should be prepared for the Operations Committee highlighting the relevant issues and recommending a decision. For contracts under £25,000 the decision and criteria should be reported to the Operations Committee.

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

The accepted tender should be the one that is economically most advantageous to the School. All parties should then be informed of the decision.

### **Leasing Policy and Arrangements**

By law an operating lease is the only type of lease available to schools. These leases involve the school paying a rental for the hire of an asset for a period of time and have the character of a rental agreement. No other lease, such as finance leases or hire purchase, may be entered into by the school as this is a form of borrowing.

Leasing agreements will only be made where the financial arrangements are such that they benefit the school and the Operations Committee has given their approval.

Once approval has been given, leasing agreements are to be signed by the Business Manager/Assistant Business Manager on behalf of the Governors.



The Business Manager/ Assistant Business Manager will be responsible for ensuring that all leasing agreements are kept under review and that appropriate arrangements are made for renewals.

Any lease entered into must meet the following criteria:

- Ownership of the asset must remain with the leasing company and there is no option for the Academy to purchase the asset during the period of the lease;
- Any extension of the lease must be at open market values;
- The Academy will not benefit from any sale proceeds of the asset; and
- The termination value of the lease is equal to or exceeds 10% of the value of the asset at the commencement of the lease.



## 7. Income

The main sources of income for the Trust are the grants from the ESFA. The receipt of these sums is monitored directly by each Business Manager/Assistant Business Manager who is responsible for ensuring that all grants due to the Academy are collected.

The Trust also obtains income from:

- Students, mainly for trips; and
- The public, mainly for lettings.

### Trips

A lead teacher must be appointed for each trip to take responsibility. The Business Manager/Assistant Business Manager must prepare a record for each student intending to go on the trip showing the amount due.

Parents/carers should make payments for all trips via ParentPay. The school office is operates as a cashless office.

The Business Manager/Assistant Business Manager will maintain an up to date record for each student showing the amount paid and the amount outstanding.

### General Lettings

The Business Manager/Assistant Business Manager/Finance Officer is responsible for maintaining records of bookings of rooms at the Academy and for identifying the sums due from each organisation. Payments must be made in advance for the use of facilities.

Details of organisations using the facilities should be entered by the Business Manager/Assistant Business Manager on the PS Financials accounting system. She will produce sales invoices and is responsible for chasing outstanding debts and ensuring no use is made of the facilities unless payment has been made.

No debts should be written off without the express approval of the governing body (the ESFA's prior approval is also required if debts to be written off are above the value set out in the annual funding letter).

For procedures concerning Lettings see section below.

### Custody

Official, pre-numbered school receipts should be issued for all cash and cheques received where no other formal documentation exists. All cash and cheques must be kept in the office safe prior to banking. Banking should take place every week or more frequently if the sums collected exceed the insurance limit on the office safe.

Monies collected must be banked in their entirety in the appropriate bank account. The Business Manager/Assistant Business Manager and Finance Officer is responsible for preparing reconciliations between the sums collected, the sums deposited at the bank and the sums posted to the accounting system.



## 8. Cash Management

### Bank Accounts

The opening of all accounts must be authorised by the Synaptic Trust that must set out, in a formal memorandum, the arrangements covering the operation of accounts, including cheque signing arrangements. The operation of systems such as Bankers Automatic Clearing System (BACS) and other means of electronic transfer of funds must also be subject to the same level of control.

### Credit Cards

1. Each academy account held by the Synaptic Trust has a credit card which has been set up and is used in accordance with Section 3.4.1 (Borrowing) of the Academies Financial Handbook 2015. The use of the card should be approved by the Governing Body/Board of Directors annually and formally recorded in the minutes of this meeting. Governors/Directors will also make clear what the credit card can be used for.
2. West Thornton will also have use of an American Express card primarily for the purchasing of food for the Teaching School from CostCo.
3. The authorised users of the card(s) and their financial limits of delegated authority (including monthly spend restrictions) are outlined below:-

Principal	£2000 – monthly limit
Associate Head	£2000 – monthly limit
Director of Business and Finance	£1000 – monthly limit
Business/Assistant Business Manager	£1000 – monthly limit
Company Secretary and Clerk	£1000 – monthly limit

4. The issue and control of the card(s) is managed by the Director of Business and Finance and hereafter referred to as the Card Manager. Cardholder(s) have been issued with associated notes of guidance, have signed to acknowledge receipt of the card and acceptance of the conditions of use and signed the card.
5. All credit cards are held securely when not in use within the school in the school safe.
6. The card must be signed in and out when required.
7. Any misuse of the card(s) outside of the conditions of use will result in the immediate withdrawal of the card(s) from the cardholder(s). The Accounting Officer will take appropriate action in line with the Finance Manual and Academies Financial Handbook.
8. The loss of any card(s) will immediately be reported to the bank and Card Manager.
9. If the card(s) are no longer required or the cardholder(s) leave the school they shall be returned to the Card Manager and destroyed in accordance with accepted procedures.
10. Card(s) will not be used for the withdrawal of cash through any ATM or cash back facilities. In exceptional circumstances cash may be withdrawn with prior approval of the Accounting Officer.
11. School credit cards must not be used for personal purchases.
12. The use of school credit cards for ordering goods and services shall operate in conjunction with the principles of best value.



13. The credit card(s) should not be used until confirmation has been made with the relevant budget holder that there is budget available under the budget heading to cover the cost of the proposed expenditure. Confirmation should also be sought that there are sufficient balances in the bank account prior to the use of cards.
14. A record of expenditure incurred together with the appropriately signed purchase order, supporting vouchers or receipts should be maintained by the cardholder(s), including a valid VAT receipt where relevant. These should be submitted to the Card Manager for the purpose of checking payments made.
15. Every month a credit card statement will be given to the cardholder and this must be returned with the supporting paperwork within 5 days of the last working day of the month, in order that the payments can be reconciled.
16. Any credit card balances should be cleared in full either by cheque or approved direct debit by the due date.

This credit card policy is signed by each authorised user.

### **Deposits**

Particulars of any deposit must be entered on a copy paying-in slip, counterfoil or listed in a supporting book. The details should include:

- The amount of the deposit; and
- A reference, such as the number of the receipt or the name of the debtor.

### **Payments and withdrawals**

All cheques and other instruments authorising withdrawal from Academy bank accounts must bear the signatures of two of the following authorised signatories:

- The CEO
- The Principal
- The Director of Business and Finance
- The Business Manager/Assistant Business Manager
- A Deputy Head

The CEO/Principal/Deputy Head must be one of the signatories and the Director of Business and Finance/Business Manager/Assistant Business Manager must be the other.

There are no payment authorisation limits.

This provision applies to all accounts, public or private, operated by or on behalf of the Governing Body of the Academy.

### **Administration**

The Business Manager/Assistant Business Manager must ensure bank statements are received regularly and that reconciliations are performed at least on a monthly basis. Reconciliation procedures must ensure that:

- All bank accounts are reconciled to the Academy's cash book; and



- Reconciliations are prepared by the Business Manager/Assistant Business Manager
- Reconciliations are countersigned by the Principal or Director of Business and Finance
- Adjustments arising are dealt with promptly

### **Petty Cash Accounts**

The Academy does not operate a petty cash system.

### **Cash Flow Forecasts**

The Business Manager/Assistant Business Manager is responsible for preparing cash flow forecasts to ensure that the Academy has sufficient funds available to pay for day to day operations. If significant balances can be foreseen, steps should be taken to invest the extra funds.

In the event that funds are needed within any academy within the group due to unforeseen delays with receipt of revenue from external sources such as HMRC, the trust will ensure funds are made available to that academy via transfer from within the group to mitigate any cashflow issues.

### **Investments**

Investments must be made only in accordance with written procedures approved by the Governing Body.

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



## 9. Fixed Assets

### Land and buildings

Freehold buildings are depreciated over their useful lives of between 15 and 50 years from the date of the revaluation. No depreciation is provided on buildings until they are brought into use. Freehold land is not depreciated.

Where land and buildings are acquired with the aid of specific grants they are capitalised and the buildings are depreciated as above. The related grants are credited to a deferred capital grant account and are released to the income and expenditure account over the expected useful economic life of the related asset on a basis consistent with the depreciated policy.

A review of impairment of a fixed asset is carried out if events or changes in circumstances indicate that the book value of the fixed asset may not be recoverable.

Buildings under construction are accounted for at cost, based on the value certified and other direct costs incurred to 31 August. They are not depreciated until they are brought into use.

### Equipment

Equipment costing less than £1,000 per individual item is written off to the income and expenditure account in the period of acquisition. All other equipment is capitalised at cost.

Second hand equipment is depreciated on a straight line basis over its remaining useful economic life. Other equipment is depreciated over 3-5 years.

Where equipment is acquired with the aid of specific grants it is capitalised and depreciated in accordance with the above policy, with the related grant being credited to a deferred capital grant account and released to the income and expenditure account over the expected useful economic life of the related equipment.

All items purchased with a value over £1,000 must be entered in the fixed asset register.

The asset register should include the following information:

- Asset description;
- Asset number;
- Serial number;
- Date of acquisition;
- Asset cost;
- Source of funding (% of original cost from ESFA grant and % funded from other sources);
- Expected useful economic life;
- Depreciation;
- Current book value;
- Location; and
- Name of member of staff responsible for the asset.

The asset register:

- Ensures staff take responsibility for the safe custody of assets;
- Enables independent checks on the safe custody of assets, as a deterrent against theft or misuse;





- Manages the effective utilisation of assets and to plan for their replacement;
- Helps the external auditors to draw conclusions on the annual accounts and the Academy's financial system; and
- Supports insurance claims in the event of fire, theft, vandalism or other disasters.

### Depreciation

Depreciation shall be calculated on a monthly basis for inclusion in the management accounts.

Depreciation rates (all straight line) to be normally used are as follows:

- Motor vehicles - 5 years
- Equipment - 5 Years
- Computers - 3 Years
- Furniture & Fittings - 5 Years

### Security of Assets

Stores and equipment must be secured by means of physical and other security devices. Only authorised staff may access the stores.

All the items in the register should be permanently and visibly marked as the Academy's property and there should be a regular (at least annual) count by someone other than the person maintaining the register. Discrepancies between the physical count and the amount recorded in the register should be investigated promptly and, where significant, reported to the Governing Body.

### Disposals

Items which are to be disposed of by sale or destruction must be authorised for disposal by the Business Manager/Assistant Business Manager and, where significant, should be sold following competitive tender. The Trust must seek the approval of the ESFA in writing if it proposes to dispose of an asset for which capital grant in excess of £20,000 was paid (from any Academy).

The Business Manager/Assistant Business Manager is responsible for authorising the disposal of individual items with an original purchase price of up to £5,000.

The Operations Committee is responsible for authorising the disposal of individual items with an original purchase price of between £5,001 and £20,000.

The Governing Body in conjunction with the Operations Committee is responsible for authorising the disposal of individual items with an original purchase price in excess of £20,000. The Academy is expected to reinvest the proceeds from all asset sales for which capital grant was paid in other Academy assets. If the sale proceeds are not reinvested then the Academy must repay to the ESFA a proportion of the sale proceeds.

All disposals of land must be agreed in advance with the Secretary of State.

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



The Academy is expected to reinvest the proceeds from all asset sales for which capital grant was paid into other Academy assets. If the sale proceeds are not reinvested then the Academy must repay to the ESFA a proportion of the sale proceeds.

All disposals of land must be agreed in advance with the Secretary of State.

### **Loan of Assets**

Items of Academy property must not be removed from Academy premises without the authority of the Principal. A record of the loan must be recorded in a loan book and booked back in Academy when it is returned.

If assets are on loan for extended periods or to a single member of staff on a regular basis the situation may give rise to a 'benefit-in-kind' for taxation purposes. Loans should therefore be kept under review and any potential benefits discussed with the Academy's auditors.



## 10. Tax

### Responsibilities

The Director of Business and Finance is responsible for:

- The regular submission of the VAT return

The Assistant Business Manager is responsible for:

- Accurate accounting of the VAT return;
- Annual review of the methods of apportionment;
- Annual review of this policy with input from the review of methods of apportionment; and
- Liaising with Auditors/Accountants regarding changes to VAT regulations and the effect of such changes upon the school.

### Accounts Receivable

Our academies are not VAT registered therefore no VAT will be added to invoices raised relating to services provided by the Academies.

### Accounts Payable

VAT, where charged, will be paid in full by the Academy. VAT will be reclaimed quarterly from HMRC using form VAT126 backed up by a detailed breakdown of the claim.

Non-Business VAT reclaim (i.e. goods/services purchased for the provision of free education services) VAT will be reclaimed in full.

Business VAT reclaim (i.e. services/goods purchased for the provision of free education services). This includes Sports Centre facility hire, Academy facility lettings. VAT will not be reclaimed.

Where costs are incurred for both business and non-business activities, the VAT will be apportioned on a fair and reasonable, as set out below:-

### Lettings (utilities)

The Academy provides free education services during the school day and is open for community lettings during the evenings and weekends. The apportionment has been calculated as a percentage of expected lettings income for the academic year against the anticipated General Annual Grant income.

VAT will be reclaimed on the free education use at 99.55% of these costs.

### General Services (miscellaneous costs for apportionment)

Invoices received relating to services provided across business and non-business use, not covered above, will be apportioned in a fair and reasonable manner. The method of apportionment used will be relevant to the nature of the service provided. These methods may include:

- Ratio of staff numbers (HR/Payroll related services); and
- Ratio of floor area of buildings (Professional services).

As part of any VAT reclaim, we will identify the apportionment method used. This list of apportionment methods will be updated upon review of this policy.



HMRC state that there should be no de-minimis limit in this respect so even if the business proportion is considered to be insignificant, an apportionment will still be carried out.

Any payments made to contractors and subcontractors are made in accordance with the Construction Industry Scheme.



## 11. Audit

The Academy has appointed Buzzacott as its auditors. The Trust has appointed UHY Hacker Young as Responsible Officer (See Annex A).



## 12. Insurance

The Trust reviews all risks annually to ensure the cover available and the sums insured are adequate.

The Trust will notify the insurers of any new risks or any other alterations affecting the existing insurance.

The Trust will not give indemnity to a third party.

The Trust will immediately advise the insurers of any accident, loss or other incident which may give rise to an insurance claim.



### 13. Bad Debts

The procedures for debt recovery and for the write-off of any debt which is deemed to be irrecoverable will follow this guidance.

Wherever possible, income due will be collected before or at the time the relevant sale or service is provided. If this is not possible, an invoice will be issued.

All debts will be recorded and non-payment will be followed up by issuing reminders at the following intervals:

- 4 weeks from date of account                      1<sup>st</sup> reminder
- 6 weeks from date of account                      2<sup>nd</sup> reminder
- 8-10 weeks from date of account                  Final reminder

If, after every effort has been made to collect the debt and legal action is considered or impractical or has been unsuccessful, individual bad (irrecoverable) debts may be written off in accordance with the following:

The CEO/Director of Business and Finance on behalf of the Academy Trust must provide 30 days notice to the Secretary of State for Education of its intention to write off any debts owed to it in excess of £5,000 as set out in Section 83 of School's Funding Agreement. This notice is required whether or not the circumstances require the Secretary of State for Education's approval (see below).

Those debts *below* the value set out in the Annual Letter of Funding can then be approved and written off by the Operations Committee in each Academy and reported to the next meeting of the Governing Body in accordance with section 2.67 of the Academies Financial Handbook. **The CEO must be informed about any write offs before approval is sought from the Operations Committee (he may or may not sanction the write off)**. They will also be reported to the Board of Directors by the Director of Business and Finance.

Any proposed write off of debts *above* the value set out in the Annual Letter of Funding require the prior written consent of the Secretary of State for Education in accordance with section 82 of Schools Funding Agreement.

To ensure sound internal control, staff who raise invoices will not have the authority to write off debts. The VAT element of any debt must not be written off, as this contravenes HM Revenue & Customs statutory requirements.

The Academy will retain a Bad Debt Write-Off Summary.



## **14. A Summary of Matters that need to be reported to the Secretary of State and matters that require authorisation from the Secretary of State taken from the Academies Financial Handbook (also see above)**

Directors/Governors will:

- Obtain approval from the Secretary of State before borrowing, including finance leases of any duration. [2.2.4 and 2.6.18];
- Notify the Secretary of State, via the ESFA, of any instances of fraud or theft where the value exceeds any sum notified by the ESFA (currently £5,000 in the Handbook), or which appears to be systematic. [2.3.7 and 3.9.2];
- Seek the Secretary of State's approval, via the ESFA, for writing off debts and losses, and entering into guarantees, indemnities and letters of comfort beyond limits specified by the Secretary of State. [2.4.9 to 2.4.12];
- Obtain the Secretary of State's approval, via the ESFA, before entering into the acquisition and disposal of fixed assets beyond limits specified by the Secretary of State. [2.4.22 to 2.4.23]; and
- Obtain the Secretary of State's approval, via the ESFA, before entering into lease arrangements beyond limits specified by the Secretary of State. [2.4.28]





## **Synaptic Operations Control and Scrutiny (SOCS)**

The CEO has introduced an internal mechanism for the audit of certain processes and areas and forms part of our own internal audit.

Principals will be responsible for completing the attached audit with their Business Manager/Assistant Business Manager.

The works scrutiny audit will take place at least once per term.

Once the audit has been completed the Principal will write a report highlighting the strengths and weaknesses of all operational processes and suggest what the next steps should be.

They will also submit an action plan with swift timeframes to rectify any weaknesses.

The audit, report and action plan will be shared with governors and directors.

We will still continue with external auditors who will look at financial controls, systems, transactions, and risks.

These are the areas that will be covered by the SOCS:

- Safeguarding and training
- Month end check list
- Purchasing, ordering and invoicing
- Income
- Contracts, SLAs and subscriptions
- Personnel
- Sickness and absence
- Premises
- Health and Safety



## APPENDIX A

### GUIDANCE FOR Responsible Officers (ROs)

#### The Role of the Responsible Officer

The role of the Responsible Officer (RO) is to provide the Governing Body (GB) with an ongoing independent oversight of the Academy's financial affairs.

In the absence of an internal audit service it falls to the RO to provide the GB with independent assurance that:

- The financial responsibilities of the GB are being properly discharged;
- Resources are managed in an efficient, economical and effective manner;
- Sound systems of internal financial control are being maintained; and
- Financial considerations are fully taken into account in reaching decisions

The RO should be a governor (but not the chairman), or an appropriately qualified and experienced individual not on the Academy's staff, with the necessary financial interest and skills to be able to perform the role competently. The RO is not expected to do the detailed accounting work personally, but will be required to check some transactions to ensure that correct procedures have been followed. The RO will need to be sufficiently familiar with the finances of the Academy to be able to report to the GB, and hence indirectly to the Synaptic Trust and the ESFA, that the above requirements have been met.

#### Performance of the RO Role

The conditions of the ESFA grant, and the financial procedures which the ESFA expect the Academy to follow, are described in the DfE Academies Financial Handbook, which expands upon the Academy's funding agreement with the Secretary of State. Further details may be set out from time to time in financial circular letters, and in the annual funding letters. The main purpose of the RO role is to ensure that these requirements are followed.

Responsible Officers are often consulted before significant financial decisions are taken and provide a useful source of advice for academies. However, the RO should also perform a wider role by visiting the Academy at least twice a year and undertaking a series of detailed tests to confirm the operation of the main financial systems. Details of the expected checks are shown below:

Written records of the checks performed by the RO should be maintained and shared with the Organisation Committee. Any significant/high risk findings should also be reported to the Trust.

#### Suggested Systems Checks to be Undertaken by the RO Each Year

##### Payroll

- Select 5 employees from the payroll and check salary details back to personnel records to confirm the amount paid is correct;
- Check 5 amendments to the payroll to ensure that appropriately authorised source documentation exists; and
- Review the final payroll print for one month to ensure it has been appropriately authorised.

##### Purchases

Select 5 payments made within the quarter and ensure:



- The payment is correctly authorised;
- The payment is correctly recorded in the accounting system;
- The invoice is correctly authorised;
- The invoice agrees to the order;
- That goods and services have been certified as received;
- The order is correctly authorised; and
- That the order has been placed with an appropriate supplier.

Obtain details of any contracts let with a value over a prescribed limit and review documentation to ensure correct quotation/tender procedures have been followed.

Review progress against any significant capital contracts to ensure payments made are appropriate and progress is satisfactory.

### **Income**

Review receipts from the ESFA and sponsors and check that the amounts received agree to source documentation.

Select one category of “miscellaneous receipts” and ensure:

- Appropriate action has been taken on any overdue amounts;
- primary records of amount due reconcile to records of monies collected;
- Monies recorded as collected have been banked promptly and in full; and
- Ensure monies collected are correctly recorded in the accounting system.

### **Accounting System**

- Review bank reconciliations to ensure that they have been correctly prepared and authorised;
- Review control account reconciliations to ensure that they have been correctly prepared and authorised; and
- Review through sample checks the procedures used to prepare financial reports issued to governors and officers of the Academy and ESFA financial returns to be satisfied that they are completed accurately and promptly.



## APPENDIX B

### Record of Financial Responsibility

<b>THE SYNAPTIC TRUST</b>	<b>FINANCIAL YEAR:</b>
---------------------------	------------------------

<b>Date Approved:</b>		<b>Date of Review:</b>	
<b>Signed</b> <b>Director of the Trust</b>			

### Approval of Budget

Delegated to:  Consistent with the Governing Body Decision Planner and Terms of Reference for Working Parties Committees	Synaptic Trust
Date of meeting to approve plan	
Date budget plan submitted to ESFA	

### Financial Reporting Arrangements:

	Monthly	Termly	Annually
Whole Governing Body/ Operations Committee		Governors Reports	Outturn Report Cashflow Report
Principal	Governors Report Cost Centre Summary		
Budget Holder	Department Budget Report		



### Bank account details for West Thornton:

Bank Account Name	Sort Code	Account Number
West Thornton Primary Academy	30 - 92 - 45	34867660
Bank Account Signatories (minimum 3)		
Stuart Roberts (CEO)	Ron Hall (interim Principal)	
Strictly Education	Emma Cathrae (Vice Principal)	
Maria Theophilou and Adam Jackson (Business Managers)	Laura McPhee (Associate Headteacher)	

### Internal Delegation Arrangements

Delegation Budget/Cost Centre	Responsibility for Monitoring	Individual Transaction Limit
See Attached Listing		Up to Budget Set

### Certifying Officers (orders/invoices/pay documents/Lettings)

Name	Document Type	Individual Transaction Limit
Stuart Roberts (CEO)	ALL	None but cheques/BACS must be countersigned
Ron Hall (Principal)	ALL	None but cheques/BACS must be countersigned
Strictly Education	ALL	None but cheques/BACS must be countersigned
Maria Theophilou and Adam Jackson (Business Managers)	ALL	None but cheques/BACS must be countersigned

Value above which two competitive quotations are sought	£1,000 to £5,000
Value above which three competitive quotations are sought	£5,000 to £100,000
Value above which full competitive tendering arrangements must be applied	£100,000
	£25,000



Expenditure limit above which the Governing Body approval is required	
Limit above which discrepancies revealed by the inventory check should be reported to the Governors	£500
Value above which Governor approval is required before disposal of equipment	£500

### Bank account details for Forest Academy:

Bank Account Name	Sort Code	Account Number
Forest Academy	30 - 92 - 45	44054860
Bank Account Signatories (minimum 3)		
Stuart Roberts (CEO)	Wayne Cooper (Principal)	
Strictly Education	Eileen Wray (Associate Head)	
Adam Jackson (Business Manager)		

### Internal Delegation Arrangements

Delegation Budget/Cost Centre	Responsibility for Monitoring	Individual Transaction Limit
See Attached Listing		Up to Budget Set

### Certifying Officers (orders/invoices/pay documents/Lettings)

Name	Document Type	Individual Transaction Limit
Stuart Roberts (CEO)	ALL	None but cheques/BACS must be countersigned
Wayne Cooper (Principal)	ALL	None but cheques/BACS must be countersigned
Strictly Education	ALL	None but cheques/BACS must be countersigned
Adam jackson (Assistant Business Manager)	ALL	None but cheques/BACS must be countersigned



Value above which two competitive quotations are sought	£1,000 to £5,000
Value above which three competitive quotations are sought	£5,000 to £100,000
Value above which full competitive tendering arrangements must be applied	£100,000
Expenditure limit above which the Governing Body approval is required	£25,000
Limit above which discrepancies revealed by the inventory check should be reported to the Governors	£500
Value above which Governor approval is required before disposal of equipment	£500

#### Bank account details for The Woodside Academy:

Bank Account Name	Sort Code	Account Number
The Woodside Academy	30 - 92 - 45	51796260
Bank Account Signatories (minimum 3)		
Stuart Roberts (CEO)	Claire Howarth (Principal)	
Strictly Education	Rachel Byrne (Deputy Head)	
Jutta Burns (Assistant Business Manager)		

#### Internal Delegation Arrangements

Delegation Budget/Cost Centre	Responsibility for Monitoring	Individual Transaction Limit
See Attached Listing		Up to Budget Set



## Certifying Officers (orders/invoices/pay documents/Lettings)

Name	Document Type	Individual Transaction Limit
Stuart Roberts (CEO)	ALL	None but cheques/BACS must be countersigned
Claire Howarth (Principal)	ALL	None but cheques/BACS must be countersigned
Strictly Education	ALL	None but cheques/BACS must be countersigned
Jutta Burns (Assistant Business Manager)	ALL	None but cheques/BACS must be countersigned

Value above which two competitive quotations are sought	£1,000 to £5,000
Value above which three competitive quotations are sought	£5,000 to £100,000
Value above which full competitive tendering arrangements must be applied	£100,000
Expenditure limit above which the Governing Body approval is required	£25,000
Limit above which discrepancies revealed by the inventory check should be reported to the Governors	£500
Value above which Governor approval is required before disposal of equipment	£500





## II – Probity and Whistleblowing

### The Academy's Code of Standards and Practice

#### (Fraud, Whistleblowing, Pecuniary Interests, Gifts and Hospitality)

##### Introduction

It is the policy of the Synaptic Trust that all staff, Directors and Governors must act in accordance with this Code.

By complying with the Code (including the declaration of any interests they may have and of gifts and hospitality they may receive) governors and staff are protecting themselves from any false accusation of malpractice, corruption or bias.

The Code defines the Directors' policy in respect of the following:

- Combating fraud;
- The disclosure of malpractice (whistleblowing);
- Pecuniary and other interests; and
- Gifts and hospitality.

##### The Expected Standards of Probity

All staff, Directors and Governors must act honestly and with integrity at all times and in accordance with the Seven Principles of Public Life (see Appendix C).

All those with responsibility for the public resources under the Academy's control must take all reasonable steps to safeguard them.

All staff must act with propriety in the use of resources and the handling and use of public funds.

All prescribed financial procedures designed to reduce the possible risk of malpractice must be applied strictly and impartially at all times.

Staff should report any financial malpractice or suspected malpractice in good faith and may make use of the Whistleblowing Procedure to do so (see Appendix E).

Directors, Governors and those staff identified in paragraph 5.1 are required to make a declaration of pecuniary and other interests at least once a year.

All other employees must declare in writing to the Principal any financial or non-financial interests which could reasonably be considered to conflict with the Academy's interests (see Section 5).

All staff, Directors and Governors must both exercise common sense and consult section 6 before accepting gifts or hospitality from outside individuals or organisations to ensure that the Academy is not compromised.



## Combating Fraud

The prevention of fraud (which incorporates a number of criminal activities – see Annex 2) is to be understood as both a corporate and an individual imperative.

All Directors, Governors and staff should be alert to the possibility that unusual events or transactions could be indicators of fraud.

All staff, Directors and Governors should make themselves aware of the appropriate channels through which a suspected fraud should be reported (see also Section 4).

All staff, Directors and Governors have a duty to co-operate fully with whoever is conducting internal checks or reviews or fraud investigations.

The Chair of Directors, the Chair of Governors and all staff in management posts will ensure that an adequate system of internal controls exists within their areas of responsibility and that the controls operate effectively.

The CEO as Accounting Officer will ensure that a sound system of internal control designed to manage the whole range of risks faced by the Academy is in place and fully operational.

The Director of Business and Finance and the Business Manager/Assistant Business Manager has overall responsibility for managing the risk of fraud, including:

- Undertaking a regular review of fraud risks;
- Establishing an effective fraud response plan;
- Designing effective controls to prevent fraud;
- Ensuring effective anti-fraud training is provided to appropriate staff;
- Reporting fraud risk issues and significant incidents of fraud to the Principal (Accounting Officer);
- External reporting in compliance with company and charity law and accounting standards;
- Ensuring that suspicions or allegations of fraud are promptly and vigorously investigated;
- Alerting the CEO/Principal to the need for legal and/or disciplinary action for fraud, supervisory failures or failure to report fraud;
- Taking appropriate action to recover assets; and
- Ensuring that appropriate action is taken to minimise the risk of similar frauds occurring in future.

The Responsible Officer, the Auditor and the Accounting Officer each has a duty to help managers reduce the risk of fraud and to deter and prevent it.

### Fraud: The Disclosure of Malpractice (Whistleblowing)

The Trust has adopted the Whistleblowing Procedure (see Annex 3) as their official code of practice on the disclosure of malpractice.

All staff should make themselves aware of the Whistleblowing Procedure as one means to help them fulfil the duties described in the procedure.

Governors and senior managers must ensure that the safeguards for informants described in the Whistleblowing Procedure are implemented fairly and energetically.

Governors who suspect fraudulent activity should raise their concerns initially with either the Chair of Governors or the Principal, as they think most appropriate to the circumstances.

### Pecuniary and Other Interests

The following have a duty to make a Declaration of Pecuniary Interests and to update it as necessary



(and in any case at least once a year): all Directors; all governors; the CEO; the Principal; the Deputy Heads; the Director of Business and Finance, the Business Manager/Assistant Business Manager and all other staff working in the Finance if appropriate they must make a nil return. The declaration pro forma is shown in Annex 5.

All other employees have a duty to advise the Principal (in each Academy) in writing of all relationships of a business or private nature with contractors and suppliers of goods and services (with which the Academy might trade) and of any financial or non-financial interests which could reasonably be considered to conflict with the Academy's interests.

The Principal will ensure that all declarations under paragraphs 5.1 and 5.2 are kept in a Register of Pecuniary Interests, maintained in accordance with Annex 6.

In considering whether there is an interest to be declared, staff and governors should consider whether a member of the public, knowing the facts of the situation, could reasonably think that a personal interest or relationship might conflict with the interests of the Academy.

A pecuniary interest should be declared where a governor or member of staff is a Local Authority Associated Person (see Annex 7) or has:

- A directorship of a company or business;
- Direct ownership or partnership in a company;
- A significant shareholding in a company;
- A position of authority in a charity or voluntary organisation;
- A position which entails part time or occasional work for a company;
- Business interests that could conflict with the Schools interests; and
- Family relationships or friendships with anyone who tenders for work from the Academy.

Anyone with a pecuniary interest in a potential contract should not take part in drawing up the specification and/or tender document.

Any member of staff or governor with a pecuniary interest in a particular decision should not normally take part in the process leading to that decision.

All persons having power to spend or to participate in discussions to spend monies on behalf of the School or any of its pupils must observe the following procedures:

- Whenever a relevant person is called upon to make or participate in making or is in a position to influence the making of a decision on expenditure on behalf of the school or any of its pupils, that person should consider whether to make a declaration and subsequently withdraw from further discussion regarding the issue.

The declaration should be made if the person concerned is aware that the recipient of the expenditure is or might be:

- Him/herself
- His/her employer or employee
- A business in which he/she has an interest (however remote)
- A member of his/her extended family
- A friend; or
- Someone to whom an obligation (either legal or moral) is owed.

The declaration should preferably be made in writing or recorded in the Minutes of a meeting. It should identify the decision on expenditure to be made and the nature of the connection.



If the person making the declaration is only one of a number participating in the decision, the declaration should be made to the other participants. They should consider, taking into account the amount of the expenditure, the nature of the connection and other relevant circumstances, whether to invite the person to exclude him/herself from the decision-making process.

If the person making the declaration is the only person making the decision on expenditure, the declaration should be made to the Principal. The Principal should consider, taking into account the amount of expenditure, the nature of the connection and other relevant circumstances, whether it is appropriate for the person concerned to make the decision or whether the decision should be made by someone else.

If the person making the declaration is the Principal, the declaration should be made to the Operations committee of the Governors, who should thereupon make the decision, excluding the Principal from the discussions.

Governors will withdraw from any meeting where the matter being discussed relates to their remuneration in a professional capacity or is related to matters in which they, or a party related to them, have a registered interest.

### **Gifts and Hospitality**

All governors and staff must abide by the standards and procedures in this section of the Code when considering whether to accept gifts or hospitality.

Offers of hospitality should only be accepted if there is a genuine need to represent the School.

Examples of when it may be proper to accept hospitality (always depending upon the particular circumstances) are as listed in sub-paragraphs 6.3.1 to 6.3.4, but overnight hospitality should never be accepted.

Attendance at conferences, events and demonstrations of equipment organised by outside bodies where there is a service interest.

Attendance at events or functions where there is a demonstrable need for the School to be represented to either give or to receive information or to participate as part of the Academy's corporate image.

Attendance at events or functions which are part of the civic, cultural or sporting life of the School.

Working lunches where this is an appropriate and effective way of conducting business and the refreshments provided are on a reasonable level.

Gifts should only be accepted in the exceptional cases listed in paragraphs 6.5 and 6.6.

The following types of gift may be accepted:

- Modest gifts of a promotional character, e.g. calendars, diaries and other similar articles;
- Gifts on the conclusion of any courtesy visit to an outside organisation of a sort normally given by that organisation; and
- Small gifts, which are defined as being up to £25 in value.

Gifts which are intended for the Academy may be accepted but must be passed to the Principal to receive and record on behalf of the Governing Body or (in appropriate cases) to the keeper of the School Archives to be catalogued.



Upon receipt of any gift (other than small gifts given as *thank yous* by pupils to practitioners, for example at Christmas or at the conclusion of a course) or hospitality, governors and staff must provide written notification using the Declaration of Gifts and Hospitality pro forma (see Annex 8). The Business Manager/Assistant Business Manager shall receive the Declarations (once countersigned by the Principal or the keeper of the School Archives) and keep them in a Register of Gifts and Hospitality, which shall be maintained in accordance with Annex 6.



## APPENDIX C

### The Seven Principles of Public Life

#### Selflessness

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

#### Integrity

Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might influence them in the performance of their official duties.

#### Objectivity

In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

#### Accountability

Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

#### Openness

Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

#### Honesty

Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

#### Leadership

Holders of public office should promote and support these principles by leadership and example.



## APPENDIX D

### Fraud: Some Useful Definitions

#### Theft

Dishonestly appropriating the property of another with the intention of permanently depriving them of it (Theft Act 1968). This may include the removal or misuse of funds, assets or cash.

#### False Accounting

Dishonestly destroying, defacing, concealing, or falsifying any account, record, or document required for any accounting purpose, with a view to personal gain for another, or with intent to cause loss to another or furnishing information which is or may be misleading, false or deceptive (Theft Act 1968).

#### Bribery and Corruption

The offering, giving, soliciting or acceptance of an inducement or reward that may influence the actions taken by the authority, its members or officers (Prevention of Corrupt Practices Acts 1889 and 1916).

#### Deception

Obtaining property or pecuniary advantage by deception (Sections 15 and 16 of the Theft Act 1968) and obtaining services or evading liability by deception (Sections 1 and 2 of the Theft Act 1978).

#### Collusion

The term “collusion” in the context of reporting fraud to the Treasury is used to cover any case, in which someone incites, instigates, aids and abets, or attempts to commit any of the crimes listed above.



## APPENDIX E

### Whistleblowing Policy

#### Policy

The Synaptic Trust is committed to the provision of high quality services and promoting the highest standards of openness, probity and accountability. Members of staff and others who have serious concerns about any aspect of the Trust's work should be able to raise these concerns without fear of victimisation, discrimination or disadvantage.

It is in the interests of the Trust, academies, Governing Bodies, members of staff and the public that wrongdoing is exposed and dealt with effectively. Members of staff are often the first to realise that there may be something seriously wrong within an organisation. In many circumstances it will be appropriate for staff to raise their concerns with their Principal/manager and this procedure is not intended to discourage this. However, where staff may be cautious about expressing their concerns because they feel that speaking up would be disloyal to their colleagues or to their School, it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice. Alternatively, there may also be circumstances where a member of staff has reported their concern to their Principal/manager and received an unsatisfactory response.

This policy and procedure are intended to ensure that suspicion of wrongdoing can be dealt with speedily and effectively. It seeks to balance safeguards for members of staff who raise genuine concerns about malpractice against the need to protect other members of staff, the school and the Governing Body against uninformed or vexatious allegations which can cause serious difficulty for innocent individuals.

#### Aims of the Policy

- To promote a culture of openness and a shared sense of integrity throughout the School by inviting all members of staff to act responsibly in order to uphold the reputation of the School and maintain public confidence
- To provide safeguards so that members of staff feel able to raise concerns about **malpractice** ('a disclosure') within the school, without fear of adverse repercussions to the individual and an effective mechanism for investigation of those concerns
- To provide feedback on action taken and advice on how to pursue those concerns further if the individuals is not satisfied with the outcome

"Malpractice" for the purpose of this policy, includes the following on the part of another member of staff, a member of the Governing Body/Trust, or any other person or persons acting on the schools behalf:

- Abuse of clients, improper discrimination against or relationship with clients
- Fraud or financial irregularity
- Corruption, bribery or blackmail





- Other criminal offences
- Failure to comply with a legal or regulatory duty or obligation
- Miscarriage of justice
- Endangering the health or safety of any individual
- Endangering the environment which results permanent damage
- Improper use of authority or powers
- Serious financial maladministration arising from the deliberate commission of improper conduct
- Unethical or improper conduct or conduct which breaches School/Council policies or falls below the standards which the School/Council subscribes to
- Concealment of any of the above

### **Application of the Policy**

This policy is intended to tackle genuine concerns of malpractice experienced by:

- A member of the School staff
- Agency staff and self-employed staff employed on school work
- The staff of Council contractors employed on school work
- Members of the school's Governing Body/Trust

For the purposes of this policy an individual who has grounds to believe that malpractice has occurred, is occurring or is likely to occur in connection with the School is referred to as 'the discloser'.

### **This Policy Does NOT Apply To:**

- The relationship between members of staff, their managers and the Governing Body, for which the employee complaints procedure or collective dispute procedures are more appropriate
- Concerns and complaints by members of the public to which the school complaint procedure will apply
- Agency, self-employed or contract workers as an alternative to such dispute resolution procedures

### **Designated Assessors**



Designated Assessors are senior members of staff of appropriate experience and standing within the Council who have received appropriate training in this procedure and have been appointed to act as “Designated Assessors” by the Executive Director for People department in the Council.

Following receipt of a disclosure the Executive Director People (or a senior contact officer to which this is delegated) will identify a Designated Assessor who will be responsible for the preliminary investigation of a disclosure and making recommendations to the Council’s Monitoring Officer and Executive Director People as to what further steps, if any, should be taken.

With the agreement of the Executive Director People (or senior officer to whom this is delegated) a Designated Assessor may seek assistance from another officer where specialist knowledge or additional support may be required for proper investigation of the disclosure.

The Executive Director People may revoke any such designation as necessary and appoint new Designated Assessors.

## **Making a Disclosure**

### **Stage One**

An individual, who has grounds to believe that the malpractice has occurred, is occurring or is likely to occur in connection with the School, should raise their concerns first with their Principal/manager. This may be done orally or in writing.

### **Stage Two**

If the individual feels unable for whatever reason to raise the matter with their Principal/manager under stage one, then they should raise the matter with their Chair of Governors.

On receipt of the disclosure, the Principal/Chair of Governors will offer to interview the Discloser in confidence. The interview should take place as soon as practicable after the initial disclosure. The Disclosure may be accompanied by a local trade union representative or work colleague at the interview. The Principal/Chair of Governors may also be accompanied by an administrative assistant/clerk to take notes, which will not identify the Discloser. For safeguards in relation to confidentiality, [see section 9 below](#).

The purpose of the interview will be for the Principal/Chair of Governors to:

- Obtain as much information as possible from the Discloser about the grounds of the belief of malpractice
- To consult with the Discloser about further steps which could be taken

### **Stage Three**



If stage one and/or two have been followed and the individual still has concerns, **or** if they feel that the matter is such that they feel they cannot raise it with their Principal or the Chair of Governors, for example because it concerns them or it is very serious, then the **Discloser** should communicate the disclosure by an email to:

[SchoolWhistleBlowing2017@croydon.gov.uk](mailto:SchoolWhistleBlowing2017@croydon.gov.uk).

The initial disclosure should be made either:

- Wherever possible, in writing
- Otherwise orally, e.g. by telephone or at interview with a **Designated Assessor**

The **Discloser** should provide as much supporting written evidence as possible about the disclosure, the grounds for the belief of malpractice and indicate why they have not felt able to raise their concerns through normal management channels.

Where a disclosure is made through the Council's confidential reporting facility, full details of the allegations will be recorded and a report passed on to Executive Director People for referral to one of the Designated Assessors.

Disclosers are encouraged to give details of their identity. If in making a disclosure the Discloser provides details of their identity these will not be passed to the Executive Director People or any other member of School or Council staff without the Discloser's express consent (and see Section 9 below)

Anonymous disclosures are much less powerful but may nevertheless be considered having regard to:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation through other suitable sources

On receipt of the disclosure, where their identity is known, the Designated Assessor will offer to interview the Discloser in confidence. The interview should take place as soon as practicable after the initial disclosure but no later than within 3 weeks of the matter being referred to the Designated Assessor by the Executive Director People. The Disclosure may be accompanied by a local trade union representative or work colleague. The Designated Assessor may be accompanied by an administrative assistant to take notes, which will not identify the Discloser. For safeguards in relation



to confidentiality, [see section 9 below](#).

The purpose of the interview will be for the Designated Assessor to:

- Obtain as much information as possible from the Discloser about the grounds of the belief of malpractice including why the disclosure is considered to be in the public interest
- To consult with the Discloser about further steps which could be taken

### **Enquiries and Report by Principal/Chair of Governor/Designated Assessor**

As soon as practicable after the interview (or after the initial disclosure if no interview takes place) and where possible within 3 weeks of the interview or initial disclosure if not interview takes place, the Principal/Chair of Governors or the [Designated Assessor](#) will determine their recommendations as to the further steps that should be taken such as:

- A report to the police or other appropriate public authority
- A referral to the Education Funding Agency if an Academy
- A full investigation either internally by the Council or externally e.g. by the Council's auditors or by investigators appointed by the Council
- Action under the School's grievance, disciplinary, harassment and bullying or complaints procedures
- Referral for consideration under other specific procedures (e.g. child protection)
- No further action (the basis for which see below)

The Principal/Chair of Governor's or Designated Assessor's recommendations will be made to the Council's Monitoring Officer and the Executive Director People to decide whether or not they agree with them. If the recommendations are agreed they will be referred to the Governing Body for implementation.

The recommendation will be made without revealing the identity of the Discloser except in the circumstances set in Section 9 below.

The grounds on which the Principal/Chair of Governor or Designated Assessor may recommend that no further action are as follows:

- If satisfied that the Discloser has not shown that malpractice within the meaning of this procedure has occurred, is occurring or is likely to occur



- If satisfied that the Discloser is not acting in good faith e.g. if after investigation it appears that the disclosure is wilfully malicious or vexatious,(in which case it may be referred for disciplinary action)
- If the matter concerned is already the subject of legal proceedings, or has already been referred to the police or other public authority
- If the matter is already, has already been, or should be, the subject of proceedings under one of the School/Council's other procedures relating to staff

Once it has been decided what further steps (if any) should be taken, the Principal/Chair of Governors or Designated Assessor will, where their identity is known, inform the Discloser of the decision. If no further action is proposed, the Principal/Chair of Governors or Designated Assessor will give the Discloser the reasons for this in writing

If the Governing Body decides not to fully implement any recommendations the Executive Director People reserves the right to issue a warning and to inform the Secretary of State.

### **External Disclosure**

It is recognised that in exceptional circumstances, or if dissatisfied after using this procedure, an individual might wish to make a disclosure without using the School's procedure. However, individuals considering such a step are advised to take legal advice before making an external disclosure.

They may make an external disclosure:

- On a confidential basis directly with bodies such as the external auditor or other appropriate public authority or such person as may be prescribed by the Secretary of State under [Section 43F of the Public Interest Disclosure Act 1998](#). Before taking any such action, the Discloser is encouraged to inform the Principal/Chair of Governors or [Designated Assessor](#) where one is already undertaking an investigation
- If they have reasonable grounds for believing that disclosure would lead to evidence being concealed or destroyed or that the Discloser will be subjected to a detriment as a result of making the disclosure.
- On a confidential basis for the purpose of taking legal advice

### **Safeguards and Confidentiality**



Any document, report or recommendation prepared by the Principal/Chair of Governors or Designated Assessor in relation to the matter will not identify the Discloser, unless:-

- The **Discloser** has consented to this in writing
- There are grounds to believe the Discloser has acted maliciously
- Where the Principal/Chair of Governors or Designated Assessor is under a legal obligation to do so
- Where the information is already in the public domain
- On a strictly confidential basis to the Designated Assessor's administrative assistant/administrative support
- On a strictly confidential basis to a professionally qualified lawyer for the purpose of obtaining legal advice

The Principal/Chair of Governors or **Designated Assessor** will ensure that all information relating to the disclosure (including that held electronically) is kept secure so that, as far as practicable, only the Principal/Chair of Governors or Designated Assessor shall have access to it.

Disclosers will be under an obligation to use all reasonable endeavours to ensure that they and their representative or work colleague (if any) keeps this matter strictly confidential save, as permitted under this procedure, as required by law or until such time as it comes into the public domain.

The Discloser will not be required by the Governing Body, without his or her consent, to participate in any enquiry or investigation into the matter established by the School unless there are grounds to believe that the Discloser may have been involved in the misconduct or malpractice.

Where the Discloser participates in any enquiry or investigation, that participation will usually be required to be on an open rather than a confidential basis. The obligations of the Principal/Chair of Governors or Designated Assessor detailed above will remain in relation to the identity of the individual as the original Discloser of information.

The Governing Body will not (and it will use all reasonable endeavours to ensure that members of staff do not) subject the Discloser to any detriment, on the grounds of the Discloser's disclosure of information under this procedure (unless there is proved abuse of this procedure through the making of wilfully malicious or vexatious disclosures). The Discloser should report any complaints of such treatment to the Principal/Chair of Governors or Designated Assessor. If the Discloser wishes the Principal/Chair of Governors or Designated Assessor to take action in relation to such complaints, the Discloser may be asked to consent in writing to the Principal/Chair of Governors or Designated Assessor revealing the Discloser's identity for the purposes of any such action.



## **Further information**

London Borough of Croydon - Anti-Fraud and Corruption Policy  
Department for Business, Innovation and Skills

## **Who to Contact for Advice on the Procedure**

Please use the following contact details:

Email: [shelley.davies@croydon.gov.uk](mailto:shelley.davies@croydon.gov.uk)

Telephone: 0208 604 7223

## APPENDIX F

### DECLARATION OF PECUNIARY INTERESTS

All Directors and Governors are required to declare any interests they or any member of their immediate family may have, which could conflict with the interests of the school.

The areas of conflict could include contracts for the provision of school services or facilities, purchases of equipment, appointment and remuneration of staff and pupil admissions.

Directors and Governors with declared interests might be required to withdraw from meetings when the relevant matters are discussed or decided.

Individual Directors and Governors are responsible for ensuring that the Register is kept up-to-date as and when changes may occur.

**Name (PRINT)** .....

*I wish to declare the following Pecuniary Interest:*

**Position in Business**.....  
(Employer/Director/Owner/shareholder)

**Nature of Business**.....  
(Manufacturer/Supplier/Service Provider)

**Name of Company/Organisation**.....

**Declared Interest**.....  
(Services/Equipment/Staff/Admissions)

**Signed:** .....

**Date:** .....

OR

*I have no relevant Pecuniary Interests:*

**Signed:** .....

**Date:** .....





## APPENDIX G

### The Register of Pecuniary Interests

The Principal shall hold the Register of Pecuniary Interests and shall be responsible for reminding staff and governors of their obligations in relation to it.

The Principal shall countersign all Declarations of Pecuniary Interest made by employees.

On-going disclosures need to be submitted in every return, even if they have been previously disclosed. The Register is a living document and the previous returns form part of the Register. The returns should be kept for seven years.

The Register is accessible for viewing during normal school hours by the following: the Principal, Deputy Head, Business Manager/Assistant Business Manager, Responsible Officer and Auditors.

Any request by a member of the public to view the Register will be referred to the Director of Business and Finance. In considering any request, the ABM will balance the requirements of the Data Protection Act 1998 and of Article 8 of the Human Rights Act, and reach a judgment in each specific case.

The Governors' Finance Committee will be informed by the Business Manager/Assistant Business Manager each Autumn Term that the Register has been fully updated.

### The Register of Gifts and Hospitality

The Business Manager/Assistant Business Manager shall hold the Register of Gifts and Hospitality and shall be responsible for reminding staff, Directors and Governors of their obligations in relation to it.

The Principal shall countersign all Declarations of Gifts and Hospitality made by employees.

Ongoing disclosures need to be submitted in every return, even if they have been previously disclosed. The Register is a living document and the previous returns form part of the Register. The returns should be kept for seven years.

The Register is accessible for viewing during normal school hours by the following: the chair of Directors, the Chair of Governors, the CEO, Principal, Deputy Heads, the Director of Business and Finance, Business Manager/Assistant Business Manager, Responsible Officer and Auditors.

Any request by a member of the public to view the Register will be referred to the Director of Business and Finance. In considering any request, the Business Manager/Assistant Business Manager will balance the requirements of the Data Protection Act 1998 and of Article 8 of the Human Rights Act, and reach a judgment in each specific case.

The Governors' Operations Committee will be informed by the Business Manager/Assistant Business Manager each Autumn Term that the Register has been fully updated.

## APPENDIX H

### DECLARATION OF GIFTS AND HOSPITALITY RECEIVED

<b>Name</b>	
<b>Role</b>	

<b>Description of gift/hospitality received:</b>
<b>Estimated value: £</b>
<b>Signature of employee</b> .....  <b>Date</b> .....

Note by Principal or by the keeper of the Academy archives:

I have authorised acceptance of this/gift hospitality because:

**Signed** .....



### III - CHARGES AND REMISSIONS

#### Introduction

This statement of policy has been drawn up to comply with (a) section 33 of the Academy's Funding Agreement and (b) Sections 449-462 of the Education Act 1996 and is subject to the approval of the Secretary of State. It is reviewed annually by the Trust in accordance with the *Handbook of Governance* and a summary is published in the school prospectus of each Academy.

#### Special Transport

With the agreement of the Academy, pupils may at times need to attend an activity which is away from the school premises and which is not provided by the Governors. Where such a pupil uses transport not provided by the Academy to travel directly between home and the place of activity, the parents will be expected to meet the cost of that transport.

#### Ingredients and Materials

If parents have indicated in advance a wish to own the finished product of a pupil's work in cooking, Art or Design Technology, for example, the cost of any ingredients or materials not supplied by those parents will be charged to them.

#### Instrumental Tuition

The Governors will make a charge for providing instrumental music tuition to pupils attending the Academy. The amount of the charge will be reviewed periodically.

#### Optional Extras

An 'optional extra' is education provided outside of school time that is not part of the National Curriculum, part of a syllabus for a prescribed public examination that the pupil is being prepared for in school, or part of religious education.

A charge will be made where the parents have previously agreed in writing to a pupil participating in an optional extra activity.

An excursion not involving one or more nights away from home will count as an optional extra if less than half the time spent on it (including travel time) falls during school hours. (The expression 'school hours' means those hours in which the Academy is actually in session and does not include the break in the middle of the school day. The present school hours are: morning 8:55am to 12:25pm and afternoon 1:25pm to 3:15pm.

An excursion not involving one or more nights away from home will count as an optional extra if the number of school sessions (half days) spent on the visit = less than 50% of the visit. (A 'half day' means any period of 12 hours ending with noon or midnight on any day). It will not count as an optional extra if 50% or more of the time = school sessions (even if some activities take place late in the evening).

The charge for an optional extra will be the actual cost of providing it, divided equally by the number of pupils willing to participate. The cost will include travel outside school hours, board and lodging, any special materials, books, instruments or other equipment required, non-teaching staff costs, entrance fees, insurance and the expenses of any teaching staff specifically engaged for the activity.



### **Board and Lodging**

Where any school activity, regardless of whether or not it is an optional extra, involves a pupil in spending one or more nights away from home, a charge not exceeding the actual cost of board and lodging for that pupil can be made.

### **Outside Organisations**

An educational trip or other activity may be offered to pupils by some organisation other than the Governors. If the activity is during school hours, pupils (and any teaching staff involved) will need leave of absence from the school. If such leave is granted by the Principal or the Governors, the outside organisation concerned will charge the parents directly for the service provided.

### **Losses and Breakages**

If a pupil is deemed to have carelessly or wilfully caused damage to school premises, materials or equipment, or by negligence loses any school property, the parents of that pupil may be asked to make a contribution to the cost of repair or replacement. The Academy also reserves the right to charge the full cost of any books which are not returned at the end of a course.

### **Voluntary Contributions**

Nothing in the 1996 Education Act or in the above policy statement prevents the Governors, the Principal or the Academy in general, from seeking voluntary contributions either for the general benefit of the Academy or in support of any school activity, whether that activity is in or out of school hours, residential or non-residential. Indeed, without voluntary contributions it would not be possible to run the rich and varied programme of extra-curricular trips so valued by parents and pupils. It may be necessary to point out to parents that a proposed activity will not take place if there are insufficient voluntary contributions.

### **Remissions**

If the activity concerned is not an optional extra, as explained in paragraph 5 above, parents whose children are in receipt of, or eligible for free school meals may not be charged for board and lodging. They may, however, be invited to make a voluntary contribution.

Any charge made to parents by the Academy may be remitted, either wholly or in part, on the grounds that payment by the parents would cause them particular and undue hardship having regard to their financial circumstances and to the educational value to the pupil of the activity concerned. The discretion to grant such assistance will be exercised by the Principal or other senior staff.

### **Benefits which entitle a parent to claim for free school meals:**

- Income Support;
- Income-based Jobseekers Allowance (not contribution based);
- Income related employment and support allowance;
- Guaranteed State Pension Credit;
- Child Tax Credit (where there is no element of working tax credit AND the total household income for tax credit purposes is assessed to be less than £16, 190 per year); and
- Financially supported by NASS (National Asylum Support Service).



## IV - BEST VALUE STATEMENT

### What is Best Value?

Directors are accountable for the way in which the Trust's resources are allocated to meet the objectives set out in the Academy's development plans. Governors need to secure the best possible outcome for pupils, in the most efficient and effective way, at a reasonable cost. This will lead to continuous improvement in the Academy's achievements and resources.

### Directors apply the four principles of *best value*:

**Challenge** – Is the Trust's performance high enough? Why and how is a service provided? Do we still need it? Can it be delivered differently? What do parents want?

**Compare** – How does the Trust's pupil's performance and financial performance compare with all schools? How does it compare with local schools? How does it compare with similar schools?

**Consult** – How does the Academy seek the views of stakeholders about the services the Trust provides?

**Compete** – How does the Academy seek secure, efficient and effective services? Are services of decisions about:

- The allocation of resources to best promote the aims and values of the Academy;
- The targeting of resources to best improve standards and the quality of provision; and
- The use of resources to best support the various educational needs of all pupils.

Directors, Governors and the Trusts Leaders:

- Make comparisons with other/similar schools using external data e.g. RAISEonline, quality of Teaching and learning, levels of expenditure;
- Challenge proposals, examining them for effectiveness, efficiency and cost, e.g. setting of annual pupil achievement targets;
- Require suppliers to compete on the grounds of cost, and quality/suitability of services/products/backup; and
- Consult individuals and organisations on quality/suitability of service we provide to parents and pupils, and services we receive from providers, e.g. assigned inspector, OFSTED.

This will apply in particular to:

- Staffing structure;
- Use of premises;
- Use of resources;
- Quality of teaching;
- Quality of learning;
- Purchasing;
- Pupils' welfare; and
- Health and safety.

Directors, Governors and the Trust's Leaders monitor time and resources spent on investigating minor areas where improvements may be less cost effective.



### **Staffing**

Directors, Governors and the Trusts Leaders deploy staff to provide best value in terms of quality of teaching, quality of learning, adult-pupil ratio, and curriculum management.

### **Use of Premises**

Governors and school managers deploy equipments, materials and services to provide pupils and staff with resources which support quality of teaching and quality of learning.

### **Teaching**

Governors and school managers review, in accordance with Governance' Curriculum Policy, the quality of curriculum provision and quality of teaching, to provide parents and pupils with: a curriculum which meets the requirements of the Funding Agreement with the Secretary of State and the needs of pupils; teaching will builds on previous learning and has high expectations of children's achievement.

### **Learning**

Governors and school managers review the quality of children's learning, to provide teaching which enables children to seek to achieve the Academy's vision.

### **Purchasing**

Governors and Academy managers continue with procedures for assessing need, and obtaining goods and services which provide "best value" in terms of suitability, efficiency, time and cost. Measures already in place include:

- competitive tendering procedures (e.g. or goods and services above £1000)
- procedures for accepting "best value" quotes, which are not necessarily the cheapest (e.g. suitability for purpose and quality of workmanship)
- procedures which minimise office time by the purchase of goods or services under £1,000 direct from known, reliable suppliers (e.g. stationery, small equipment)

### **Pupils' Welfare**

Governors and Academy managers review the quality of the Academy environment and the Academy ethos, in order to provide a supportive environment conducive to learning and recreation.

### **Health and Safety**

Governors and Academy managers review the quality of the school environment and equipment, carrying out risk assessments where appropriate, in order to provide a safe working environment for pupils, staff and visitors.

### **Managing risks**

Governors maintain a register of risks and seek to minimise and manage them.



## V - ICT DISASTER RECOVERY

The Trust must ensure that the secure backup and recovery of important data that is stored on the school network. The data to backup includes each Academy's management data files, admin office documents and files, PS finance files, SIMS modules data, staff and student documents and files.

Data can be destroyed in various ways and the ongoing availability of important data is critical to the operation of the school. Data should be adequately backed up by following an appropriate system backup procedure. The strategies in place will ensure the recovery of data that could be lost due to fire, water, hardware or software failure, file deletion or virus attack.

### Risk Analysis

- Virus - Medium probability, variable impact. Sophos Anti-virus being used across site
- Fire - Low probability, high impact. There are existing school fire safety guidelines in place, see the site manager
- Flood - Low probability, high impact. The servers are located on the first floor of the premises and are held in a tall server rack
- Accidental deletions - High probability, low impact. Restoration from our current backups is very simple and fast
- Theft - Low probability, high impact. A minimum of two but more likely three locked doors to break through to reach the server cupboard, plus there is an alarm
- Power loss - High probability, low impact. Uninterruptable power supplies are in place for the servers allowing them to shut down safely without risk of damage to data

### Passwords

Access to the school network is limited to known individuals via passwords. Passwords are reviewed regularly by the ICT Leader, ICT Technician and our external support providers.

### Full Backups

Data is backed up every night onto backup tape drives installed on the school network servers. This is completed using a backup system. In addition to daily backups, there is a four weekly Friday backup which ensures data can be recovered for the length of this time frame.

We do not believe it necessary to take data offsite as this makes it more difficult to maintain data security under the data protection act due to the increased chance of theft or loss.

### Backup of data stored on teacher laptops

It is the responsibility of the member of staff who uses a laptop to store and back up personal data on the C Drive on that device.

### Off Site Storage of data

Specific data on the Curriculum Server is also backed up using Gridstore Secure Store.

### Archiving of data

Evidence of learning is archived on a regular basis to a duo external hard drive.

### Backup Log Monitoring

The ICT technician monitors the backup logs at 8am every morning to ensure that network data has been fully backed up. Backups are also regularly tested to ensure that data can be correctly restored.



### **Anti-Virus Protection**

The school has anti-virus protection on all computers including the CC4 server. The antivirus protection is updated daily from the Internet. If a virus is identified on a computer then it is reported immediately to the ICT Technician and external Technical Support provider.

### **Disaster Recovery**

In the event of a complete network failure, power cut, server breakdown, fire or any other eventuality where the school network is unavailable the CEO will need to give approval for time to be spent on its restoration.

### **Plan of Action**

In the event of a large disaster involving server failure we will call our external support company, to assist in the swift restoration of the backup data.





## VI - LETTINGS

### Objectives

The governors recognise that:

- The Academy premises represents a significant capital investment and should be fully utilised;
- The Academy premises is a valuable community resource;
- Educational usage constitutes a natural priority; and
- Profit margin is an important consideration when derived from commercial usage but is not always the objective when facilitating educational activities by designated users.

### Priority Users

The governors have adopted the following category of priority user:

- (i) Statutory users
- (ii) Designated users
- (iii) Private users

The Governing Body have reserved the right to determine some organisations designated status. These will usually be organisations that create extra-curricular opportunities for the wider Academy community e.g. scouts/guides or after Academy provision. The Governing Body will consider discounts for designated users.

### Scale of Charges

On arriving at their scale of charges, the governors have followed the following principles:

- Statutory users will be charged an amount commensurate with cost recovery;
- Designated users will receive a discount;
- Private users will be charged on a cost plus an income margin for the Academy;
- There will be parity of treatment for similar users; and
- The Organisation Committee will determine which group any particular individual or organisation belongs.

### General

The governors recognise that it would be impossible for them to personally vet every applicant or organisation who wishes to make use of the Academy premises. Accordingly they have delegated the authority to accept applications for hire from at least two of the following persons:

- Chair of the Operations Committee
- Principal
- Lettings Administrator (Director of Business and Finance)
- Lettings Officer (Business Manager/Assistant Business Manager)

**This policy will be reviewed annually in the months of June/July and the hire charges for the forthcoming financial year will be agreed.**



## Appendices

- **Appendix 1** – Conditions of Hire
- **Appendix 2** – Charges and Times of Hire
- **Appendix 3** – Lettings Booking Form

## Conditions of Hire

### Booking and Payment

#### The following procedures will always be followed:

- All enquiries are directed to the Academy's lettings administrator;
- A meeting with the lettings administrator is arranged to show the facilities and discuss the conditions of hire;
- A date and time frame is agreed (the minimum period for which a charge for hire will be made is two hours);
- The charge is agreed (charges are inclusive of the cost of utilities, personnel and parking);
- To secure the booking the hirer must complete a booking form and a £100 deposit payment must be made to secure the reparation of any damage which may be occasioned and as payment for the over-running of the agreed times. The deposit will be returned after the function, less the amount the Academy may deduct to cover these costs;
- On receipt of the booking form, the Academy will invoice the hirer for the full amount. Payment must be made at least two full weeks prior to the function;
- All payments will be made to the Academy office – cheques (made out to West Thornton Primary Academy) and BACS are both acceptable. Receipts will always be provided as proof of payment;
- The Academy will seek to recover costs incurred which are unavoidable and result directly from the cancellation of a booking;
- Hirers must state the maximum number of people expected and the Academy reserves the right to limit the number of people admitted dependent on the type and size of the accommodation hired;
- All hiring is subject to the hirer or the authorised representative occupying and vacating the premises at the stated times – should the function over-run the stated time, the hirer will be liable for extra fees;
- The lettings officer and hirer will inspect the condition of the area to be hired before the function has taken place on the day of the hiring.
- The hirer and lettings officer will inspect the area(s) hired following the function and sign the completion slip on the lettings booking form to confirm that the hiring has been completed within the terms of the agreement;
- In the event of the hirer not arriving within 30 minutes of the agreed starting time, the premises will be secured and the let considered cancelled – in this event, no money will be refunded;
- If the hiring finishes earlier than the stated time, a responsible person must remain on site until the lettings officer has been informed and locking up can begin;
- The Academy reserves the right to refuse without explanation any application and to cancel the hiring at any time without written notice;
- On the termination of the hiring under the above condition, the Academy shall return all or part of any money paid but shall not be under any liability for any loss or damage arising out of such termination; and
- Persons under the age of 18 are not eligible to hire the premises.



## Health and Safety and Other General Conditions

- Parking is at the risk of the vehicle's owner, is only allowed on hard surfaces and is controlled by the Academy's lettings officer;
- The Academy reserves the right to insist on the ejection of any person who is acting in a disorderly fashion;
- In exceptional circumstances, e.g. fire, flood or other emergency situations, the Academy reserves the right to suspend the hiring until the premises are made safe;
- The hirer shall ensure that the noise is kept to a minimum at all times, especially when exiting the site;
- In the case of youth and junior organisations, a sufficient number of responsible adults must be in charge for the period of hire and ensure adequate supervision of all areas of the site to which the children have access;
- The hirer shall undertake to see that the premises are used in an orderly way and for the purposes only for which they are hired;
- The hirer shall reimburse the Academy the cost of making good any damage to the Academy's property arising from the hiring;
- The hirer shall not use or permit the use of the premises for the sale of goods by way of competitive bidding unless the sale is for the purpose of assisting the funds of a voluntary organisation whose activities are not carried out for profit and the whole, or substantially the whole, of the proceeds are devoted to the funds of the organisation;
- The Academy reserves the right to refuse entry to the premises in the interests of the health and safety of those present.

## Exclusions

- The hirer may not assign or sub-let the use of the premises to any other person;
- The Academy buildings and site are entirely a non-smoking and class A, B or C non-drug taking-free area;
- The selling of alcohol is strictly forbidden;
- Nails, tacks, screws etc must not be driven into the walls, ceilings, floors or fittings, or sellotape used to affix anything onto the walls, windows, or any other surface;
- No alteration or addition to the electrical installation shall be made and no equipment or apparatus is to be connected to it without prior agreement;
- PA systems or sound equipment are not to be used without prior agreement;
- No furniture, instruments or equipment belonging to the hirer may be left or stored on the premises without the agreement of the lettings officer and if permission is granted, the hirer's goods are stored at his or her risk;
- Notices must not be exhibited on any part of the premises without the prior agreement of the Academy;
- Any hiring is subject to the condition that the premises will not be used for political purposes or the teaching of any political party politics or the public exhibition of films;
- The premises are not licensed for public entertainment and consequently the collection of money for admission and advertising any entertainment to the general public cannot be permitted; and



- The hirer and those attending the function must not enter parts of the site other than those included in the booking agreement.

The Trust does not undertake any responsibility for:

- Loss or damage of any goods or effects belonging to the hirer or any other person present;
- Injury to any person attending the premises unless the injury results from the Academy's negligence; or
- Any breakdown, leakage, fire or accident rendering necessary the closure of the premises nor for any interruption of the hiring for repairs or renewals consequent on any such breakdown, leakage, fire or accident.

**Failure to comply with these regulations in any part may render the hirers ineligible for further hiring.**

## Charges and Times of Hire

Charges for Hire of Academy Facilities		
Facilities	Two Hour Session	Additional Hourly Rate
Hall	<b>£140</b>	<b>£40</b>
Classroom (for after Academy clubs only)	<b>£20</b>	<b>£10</b>
Playground	<b>£60</b>	<b>£20</b>

Times of Hire		
Days*	Start Time	Time of Finish
Sunday to Thursday	<b>10.00am</b>	<b>11.00pm</b>
Friday and Saturday	<b>10.00am</b>	<b>11.30pm</b>
* During term time, the site will not be available during the Academy day.		

**If you require public liability insurance there will be an extra 12% added to the cost of hiring.**

## LETTINGS BOOKING FORM

COMPLETED AT THE TIME OF BOOKING	
Name of Hirer:	Organisation:
Address of Hirer:	Contact Number:
Date(s) of Hire	
From am/pm:	To am/pm:
Special Instructions e.g. every Sunday	Total Days:
Accommodation Required:	Maximum Attendees:
Information for Lettings Officer e.g. Furniture required	
Purpose of Hire (brief description):	
Cost:	
Total Cost*:	Deposit (returnable, less additional costs):
<i>* To be paid in full at least two weeks prior to the function</i>	

I have read through the <i>Conditions of Hire</i> with the hirer	I agree to abide by the <i>Conditions of Hire</i>
Signature of the Lettings Administrator:	Signature of the Hirer:
Date:	Date:



COMPLETION SLIP - TO BE COMPLETED ONCE THE EVENT HAS TAKEN PLACE	
I am satisfied the conditions of hire have been duly observed and that the Academy has not incurred additional costs a result of the booking.	
Time Arrived:	Time Departed:
Signature of the Lettings Administrator:	Signature of the Hirer:
Date:	Date:

Where either party feels unable to sign the completion slip, representation should be made in writing to the Principal. The reverse of this form can be used to outline the reasons.





## VII - FREEDOM OF INFORMATION

The Synaptic Trust will:

- Proactively publish or otherwise make available as a matter of routine, information, including environmental information, which is held by the Academy and falls within the classifications below;
- Specify the information which is held by the Academy and falls within the classifications below;
- Proactively publish or otherwise make available as a matter of routine, information in line with the statements contained within this policy;
- Produce and publish the methods by which the specific information is made routinely available so that it can be easily identified and accessed by members of the public;
- Review and update on a regular basis the information the Academy makes available under this policy;
- Produce a schedule of any fees charged for access to information which is made proactively available; and
- Make this publication policy available to the public.

### Classes of Information

#### Who we are and what we do

Organisational information, locations and contacts, constitutional and legal governance

#### What we spend and how we spend it

Financial information relating to projected and actual income and expenditure, tendering, procurement and contracts

#### What our priorities are and how we are doing

Strategy and performance information, plans, assessments, inspections and reviews

#### How we make decisions

Policy proposals and decisions. Decision making processes, internal criteria and procedures, consultations

#### Our policies and procedures

Current written protocols for delivering our functions and responsibilities

#### Lists and Registers

Information held in registers required by law and other lists and registers relating to the functions of the Academy.



## The Services we offer

Advice and guidance, booklets and leaflets, transactions and media releases. A description of the services offered.

The classes of information will not generally include:

- Information the disclosure of which is prevented by law, or exempt under the Freedom of Information Act, or is otherwise properly considered to be protected from disclosure.
- Information in draft form.
- Information that is no longer readily available as it is contained in files that have been placed in archive storage, or is difficult to access for similar reasons.

## The method by which information published under this policy will be made available

Academies within the Trust will indicate clearly to the public what information is covered by this policy and how it can be obtained.

Where it is within the capability of an Academy, information will be provided on a website. Where it is impracticable to make information available on a website or when an individual does not wish to access the information by the website, the Trust will indicate how information can be obtained by other means and provide it by those means.

In exceptional circumstances some information may be available only by viewing in person. Where this manner is specified, contact details will be provided. An appointment to view the information will be arranged within a reasonable timescale.

Information will be provided in the language in which it is held or in such other language that is legally required. Where an Academy is legally required to translate any information, it will do so.

Obligations under disability and discrimination legislation and any other legislation to provide information in other forms and formats will be adhered to when providing information in accordance with this policy.

## Charges which may be made for information published under this policy

The purpose of this policy is to make the maximum amount of information readily available at minimum inconvenience and cost to the public. Charges made by the Academy for routinely published material will be justified and transparent and kept to a minimum.

Material which is published and accessed on a website will be provided free of charge.

Charges may be made for information subject to a charging regime specified by Parliament.

Charges may be made for actual disbursements incurred such as:

- Photocopying;
- Postage and packaging; and
- The costs directly incurred as a result of viewing information



Charges may also be made for information provided under this policy where they are legally authorised, they are in all the circumstances, including the general principles of the right of access to information held by public authorities, justified and are in accordance with a published schedule or schedules of fees which is readily available to the public.

If a charge is to be made, confirmation of the payment due will be given before the information is provided. Payment may be requested prior to provision of the information.

### Written Requests

Information held by the Trust that is not published under this policy can be requested in writing, when its provision will be considered in accordance with the provisions of the Freedom of Information Act.

The method by which information published under this policy will be made available: **See table.**



## Freedom of Information

### Guide to information available from the Synaptic Trust

Information to be published	How the information can be obtained	Charge
<p><b>Who we are and what we do</b>  <i>(Organisational information, structures, locations and contacts)</i></p> <p>This will be current information only</p>	<p>Website  Hard Copy</p>	<p>Photocopying  (10p a sheet)  Postage costs  Admin costs  if applicable</p>
Academy Funding Agreement – a link to the document on the Department for Education’s website	Hard Copy	
Academy Order (if applicable)	Hard Copy	
School staff and structure – names of key personnel	Website Hard Copy	
Governing body/Board of Directors – names and contact details of the governors and the basis of their appointment	Website Hard Copy	
School session times, term dates and holidays	Website Hard Copy	
Location and contact information – address, telephone number and website	Website Hard Copy	
Contact details for the CEO and the Governing Body/Board of Directors	Website Hard Copy	
Individual Academy Prospectuses	Website Hard Copy	

<p><b>What we spend and how we spend it</b>  <i>(Financial information relating to projected and actual income and expenditure, procurement, contracts and financial audit)</i></p> <p>This should be a minimum of current and the previous two years financial years (accounts that have been filed with the Charity Commission and Companies House).</p>	Hard Copy	<p>Photocopying  (10p a sheet)  Postage costs  Admin costs  if applicable</p>
Annual budget plan and financial statements	Hard Copy	
Capital funding – details of capital funding allocated to the school along with information on related building projects and other capital projects	Hard Copy	
Additional funding – Income generation schemes and other sources of funding.	Hard Copy	
Procurement and contracts – details of procedures used for the acquisition of goods and services. Details of contracts that have gone through a formal tendering process.	Hard Copy	



Staffing and grading structure	Hard Copy	
Pay policy – a statement of the Academy’s policy on procedures regarding teachers’ pay.	Hard Copy	
Governors’ allowances – Details of allowances and expenses that can be claimed or incurred.	N/A	

<b>What our priorities are and how we are doing</b> <i>(Strategies and plans, performance indicators, audits, inspections and reviews)</i>  Current information should be published.	Hard Copy	Photocopying (10p a sheet) Postage costs Admin costs if applicable
School profile <ul style="list-style-type: none"> <li>• Government supplied performance data</li> <li>• OFSTED report – summary and full report</li> </ul>	Website Hard Copy	
Performance management information	Hard Copy	
Academy’s future plans – any major proposals on safeguarding and promoting the welfare of children.	Hard Copy	
Child protection – policies and procedures on safeguarding and promoting the welfare of children.	Website Hard Copy	

<b>How we make decisions</b> (Decision making processes and records of decisions)  Current and previous three years as a minimum	Hard Copy	Photocopying (10p a sheet) Postage costs Admin costs if applicable
Admissions policy - arrangements and procedures and right of appeal – include information on application numbers and number of successful applicants by each oversubscription criteria.	Website Hard Copy	
Governing body meeting agendas, papers and minutes – information that is properly considered to be private should be excluded.	Hard Copy	



<p><b>Our policies and procedures</b>  <i>(Current written protocols, policies and procedures for delivering our services and responsibilities)</i></p> <p>Current information only</p>	<p>Website Hard Copy</p>	
<p>Trust policies including:</p> <ul style="list-style-type: none"> <li>• Charging and remissions policy</li> <li>• Health and Safety and risk assessment</li> <li>• Complaints procedure</li> <li>• Staff conduct policy</li> <li>• Discipline and grievance policies</li> <li>• Pay policy</li> <li>• Staffing structure implementation plan</li> <li>• Information request handling policy</li> <li>• Staff recruitment policies</li> </ul>	<p>Website Hard Copy</p>	
<p>Pupil and curriculum policies, including:</p> <ul style="list-style-type: none"> <li>• Home-school agreement</li> <li>• Curriculum</li> <li>• Sex education</li> <li>• Special education needs</li> <li>• Accessibility</li> <li>• Race equality</li> <li>• Collective worship</li> <li>• Careers education</li> <li>• Pupil discipline</li> </ul>	<p>Website Hard Copy</p>	<p>Photocopying (10p a sheet) Postage costs Admin costs if applicable</p>
<p>Records management and personal data policies</p> <ul style="list-style-type: none"> <li>• Information security</li> <li>• Records retention</li> <li>• Destruction and archive policies</li> <li>• Data Protection policies</li> </ul>	<p>Hard Copy</p>	
<p>Equality and diversity  (Policies, schemes, statements, procedures and guidelines relating to equal opportunities)</p> <ul style="list-style-type: none"> <li>• Policies and procedures for the recruitment of staff – details of vacancies should be included</li> </ul>	<p>Hard Copy</p>	
<p>Charging regimes and policies  This should include details of any statutory charging regimes. Charging policies should include details of charges made for information routinely published. They should clearly state what costs are to be recovered, the basis on which they are made and how they are calculated.</p>	<p>Hard Copy</p>	



<b>Lists and Registers</b>	Hard copy; some information may only be available for inspection	Photocopying (10p a sheet) Postage costs Admin. costs if applicable
Currently maintained lists and registers only		
Curriculum circulars and statutory instruments	Hard Copy	
Disclosure logs	Hard Copy	
Asset register	Hard Copy	
Any information the Academy is currently legally required to hold in publicly available registers	Hard Copy	

<b>The services we offer</b> <i>(Information about the services we offer, including leaflets, guidance and newsletters produced for the public and businesses)</i>	Website Hard Copy	Photocopying (10p a sheet) Postage costs Admin. costs if applicable
Current information only		
Extra-curricular activities	Website Hard Copy	
Out of school clubs	Website Hard Copy	
School publications	Website Hard Copy	
Services for which the Academy is entitled to recover a fee, together with those fees	Hard Copy	
Leaflets, booklets and newsletters	Hard Copy	



## APPENDIX I

### Scheme of Delegation to Local Governing Bodies

Effective date: 1st August 2013

#### 1. Introduction

1.1. As a charity and company limited by guarantee, The Synaptic Academy Trust (UK) Ltd (the “Company”) is governed by a Board of Directors (the “Directors”) who are responsible for, and oversee, the management and administration of the Company and the academies run by the Company. This Scheme of Delegation applies to all academies run by the Company.

1.2. The Directors are accountable to external government agencies including the Charity Commission and the Department for Education (including any successor bodies) for the quality of education they provide and they are required to have systems in place through which they can assure themselves of quality, safety and good practice.

1.3. In order to discharge these responsibilities, the Directors appoint people who are more locally based to serve on a committee (the “Local Governing Bodies”) which are established to ensure the good governance of the individual academies. The Local Governing Bodies are committees established by the Directors and are at all times subject to any directions the Directors may give. The terms of this delegation may be altered, suspended or withdrawn by the Directors.

1.4. This Scheme of Delegation explain the ways in which the Directors fulfil their responsibilities for the leadership and management of the Academies, the respective roles and responsibilities of the Directors and Governors of the Local Governing Bodies and the commitment to each other to ensure the success of each academy.

1.5. It is intended that a Local Governing Body shall be established for each Academy. *For the avoidance of doubt a Local Governing Body may be delegated responsibility for more than one academy.*

1.6. Certain decisions and actions in respect of the Company and the Academies are reserved to the Directors. In general terms responsibility for the strategy, management and operations for each academy will be delegated to a Local Governing Body.

1.7. This Scheme of Delegation has been put in place by the Directors from the Effective date in accordance with the provisions of the Company’s Articles of Association (the “Articles”) and it should be read in conjunction with those Articles. References in this Scheme to numbered Articles are to the relevant clause of the Articles.

#### 2. Ethos and Trust Commitment

2.1. The Commitment of the Company is to: ‘Maximise achievement and make a difference by keeping children at the forefront of our thinking and decision making’. This is underpinned by a belief that: ‘Every child deserves the opportunity to have a life that is free from fear and danger, where they can give and receive respect and enjoy a sense of wellbeing, belonging, worth and achievement’.

2.2. In addition to the Trust’s Commitment each academy will have its own mission/vision which the Principal and governors will implement.

2.3. Academies within the Company will work with each other in a co-operative and supportive manner; sharing expertise and specialisms. Academies within the Company will engage with other local schools and partners in order to ensure quality provision for children and families within a community.





### **3. Directors' powers and responsibilities**

3.1. The board of directors, their powers and administration of their meetings and affairs is established in the Articles

3.2. The Directors have overall responsibility and ultimate decision making authority for all the work of the Company, including the establishment and running of the academies. This is largely exercised through strategic planning and the setting of budgets and policy. It is managed through business planning, monitoring of budgets, performance management, the setting of standards and the implementation of quality management processes. The Directors have the power to direct change where required.

3.3. The Directors have a duty to act in accordance with the Company's objects as set out in Article 4.

3.4. Directors will have regard to the interests of all academies for which the Company is responsible in deciding and implementing any policy or exercising authority in respect of any one Academy.

3.5. Article 101 provides for the appointment by the Directors of committees to whom the Directors may delegate certain of the functions of Directors. In further recognition of the Directors power to delegate under Articles 102 and 105, responsibility for running each academy will be delegated to the committee established pursuant to this Scheme of Delegation known as a Local Governing Body.

3.6. The constitution, membership and proceedings of each Local Governing Body is determined by the Directors and this Scheme of Delegation expresses such matters, acknowledging the authority delegated to the Local Governing Bodies in order to enable the Local Governing Bodies to run the Academies and fulfil the Company's Commitment and each Academy's vision/mission.

### **4. Co-ordinating Local Governing Bodies work**

#### **4.1. General provisions**

4.1.1. It is vital to the reputation and the overall governance and management of the Company and the Academies that the work of the Local Governing Bodies is co-ordinated to avoid the risk of waste, duplication, and inconsistency in the development and implementation of policies and procedures.

4.1.2. All Local Governing Bodies must work within a structure of openness and accountability to ensure that decisions are consistent with the Company's Commitment statement and the values and ethos of the Academy.

4.1.3. Local Governing Bodies and their committees must ensure that other Local Governing Bodies, their committees and the Directors are consulted and kept informed appropriately where they have, or are likely to have, an interest in the topic or matter.

4.1.4. To ensure consistency of the Company's public relations and presentation of the brand, the Local Governing Bodies and any committee with any responsibility for marketing or any other public representations must clear their public documents, policies and press statements with the Operations Director or Chief Executive before issuing the material to the public.

### **5. Delegated powers**

#### **5.1. General provisions**

5.1.1. Subject to provisions of the Companies Act 2006, the Articles and to any directions given by the Members of the Company following a special resolution and the decisions of the Directors, the management of the business of each Academy are hereby delegated by the Directors to the Local Governing Body who may exercise all the powers of the Company in so far as they relate to the Academy, in accordance with the terms of this Scheme of Delegation.



5.1.2. All actions of the Local Governing Body must be in furtherance or ancillary to the Object of the Company.

5.1.3. No alteration of the Articles and no such direction shall invalidate any prior act of the Local Governing Body which would have been valid if that alteration had not been made or that direction had not been given.

5.1.4. A meeting of the Local Governing Body at which a quorum is present may exercise all the power so delegated.

5.1.5. The Directors retain responsibility for the business of the academies in so far as the business relates to all academies or multiple academies run by the Company.

5.1.6. In general terms, the responsibility of the Directors in so far as the business of The Academy is concerned is to determine the policy and procedures of the Academy and to consider and respond to strategic issues. Whilst the Directors are free to decide what constitutes a strategic issue, having regard to all the circumstances, unless a matter is identified as a strategic issue and/or is identified as being the responsibility of the Directors under this Scheme of Delegation, the responsibility for such matter will be that of the Local Governing Body.

5.1.7. Except as provided for in this Scheme of Delegation, in addition to all powers hereby expressly conferred upon the Local Governing Body and without detracting from the generality of the powers delegated, the Local Governing Body shall have the following powers, namely:

5.1.7.1. to expend certain funds of the Company as permitted by clause 5.3 in such manner as the Local Governing Body shall consider most beneficial for the achievement of the Object in so far as it relates to the Academy and to invest in the name of the Company such parts of the funds of the Company for which it has responsibility pursuant to this Scheme of Delegation as it may see fit and to direct the sale or transportation of any such investments and to expend the proceeds of any such sale in furtherance of the Object; and

5.1.7.2. to enter into contracts on behalf of the Company in so far as they relate to the Academy in accordance with clause 5.3 and subject to the limits and compliance with the Financial Permission Form and Mandate for the academy set out in the Financial Handbook.

5.1.8. The delegated powers are delegated to the Local Governing Body as a whole.

5.1.9. In the event of a situation requiring an immediate decision the chair or in his absence the vice-chair shall have authority to make a decision and/or take action on behalf of the Local Governing Body. Following any such decision or action the chairman or vice-chairman shall report their actions to the Local Governing Body and CEO as soon as reasonably practicable. The situation shall thereafter be managed in the usual way.

5.1.10. In the exercise of its powers and functions, the Local Governing Body will consider any advice given by the Principal, the Chief Executive of the Company as well as the Directors.

5.1.11. The Principal and governors shall ensure that finances are managed in line with the agreed financial procedures.

## **5.2. Ethos and values**

5.2.1. Whilst the Local Governing Body shall be responsible for ensuring that the Academy is conducted in accordance with its mission/vision and the values referred to in clause 2, the determination of each Academy's ethos and mission statement shall be the responsibility of the Governors.

5.2.2. At all times, the Directors and the Local Governing Bodies shall ensure that the Academy is conducted in accordance with the object of the Company and any agreement entered into with the Secretary of State for the funding of the Academy.



### 5.3. Finance

5.3.1. In acknowledgement of the receipt by the Company of funds in relation to each Academy; including by not limited to grant funding provided by the Secretary of State, monies donated to the Company and monies generated from the activities of the Company or any group company, the Directors delegate to each Local Governing Body the responsibility to manage and expend all monies received on account of the relevant Academy for the purposes of the Academy less an amount to be determined each year by the Directors, which will include payment for centralised services, and will be notified to the Local Governing Bodies by the start of each School year or within 21 days of receipt of notification from the ESFA of the General Annual Grant for the Academy if later.

5.3.2. Each Local Governing Body will agree a finance plan with the Directors in advance of each School year or as soon as possible thereafter.

5.3.3. Pursuant to clause 5.1.3 the Local Governing Body shall have the power to enter into contracts on behalf of the Company in so far as they relate to the Academy provided that:

5.3.3.1. all contracts must be in the name of the Company

5.3.3.2. the authority of the Local Governing Body to enter into to contracts is limited to the thresholds provided in the Financial Permission Form and Mandate for the academy set out in the Financial Handbook

5.3.3.3. any contracts must be signed by authorized signatories

5.3.3.4. the Local Governing body shall first obtain written consent from the Directors to enter into any contracts or expenditure for any single matter if the Financial Permission Form and Mandate require it.

5.3.4. The accounts of the Company shall be the responsibility of the Directors but the Local Governing Body shall provide such information about the finances of the Academy as often and in such format as the Directors shall require. Each Local Governing Body shall provide monthly management accounts to the Directors.

5.3.5. The Local Governing Body shall ensure that proper procedures are put in place for the safeguarding of funds and that the requirements of the Academies Financial Handbook and the Company's Financial Handbook are observed at all times as well as any requirement and recommendations of the Directors and Secretary of State.

5.3.6. The Local Governing Body shall inform the Directors of any need for significant unplanned expenditure and will discuss with the Directors (and others as the Directors shall require) options for identifying available funding.

5.3.7. The Local Governing Body shall develop appropriate risk management strategies and shall at all times adopt financial prudence in managing the financial affairs of the Company in so far as these relate to the Academy.

### 5.4. Premises

5.4.1. The land and buildings of each Academy are held and owned by the Company and any legal interests in the land and buildings to be granted or varied are reserved to the Directors on behalf of the Company.

5.4.2. Informal lettings and use of the land and buildings may be managed by the Local Governing Bodies provided that no legal interest is granted.

5.4.3. The responsibility for any disposals or acquisitions of land to be used by the Academy will be that of the Directors.



5.4.4. Insuring the land and the buildings used by the Academy will be the responsibility of the Directors who shall recover the cost from the budget delegated to the Local Governing Body either before or after the budget is delegated.

5.4.5. It shall be noted that the use of the land and buildings may be subject to legal restrictions on the legal title or in any lease to the Company. The Local Governing Bodies shall consult the Directors on any aspect of the land and buildings that may require a consent from a third party, including but not limited to proposed building works, proposed leases or sharing occupation.

5.4.6. Subject to and without prejudice to clauses 5.3.2 and 5.4.4, the maintenance of the buildings and facilities used in respect of the Academy is the responsibility of the Local Governing Body, who shall have regard at all times to the safety of the users of the buildings and the facilities and the legal responsibilities of the Company as the owner of such buildings and facilities.

5.4.7. The Local Governing Body shall in conjunction with the Directors develop a 5-year estate management strategy that will identify the suitability of building and facilities in light of long term curriculum needs and the need for and availability of capital investment to meet the Local Governing Body's responsibility to ensure the buildings and facilities are maintained to a good standard.

## **5.5. Resources**

### **5.5.1. Principal**

5.5.1.1. The Directors shall always take responsibility for appointing the Principal of each Academy. The Directors may delegate this responsibility to the local governing body and may also delegate such powers and functions as they consider are required by the Principal for the internal organisation, management and control of the Academy (including the implementation of all policies approved by the Directors and Local Governing Body and for the direction of teaching and the curriculum at the Academy).

5.5.1.2. The Chief Executive of the Company will take the lead in appraising the Principal with involvement of two Governors of the Local Governing Body.

### **5.5.2. Other staff**

5.5.2.1. With the Principal, the Local Governing Body shall be responsible for the appointment and management of all other staff to be employed at the Academy on behalf of the Company provided that the Local Governing Body shall:

5.5.2.1.1. comply with all policies dealing with staff issued by the Directors from time to time;

5.5.2.1.2. take account of any pay terms set by the Directors;

5.5.2.1.3. adopt any standard contracts or terms and conditions for the employment of staff issued by the Directors provided that if doing so would result in a breach of a legal obligation or result or potentially result in a liability arising the Local Governing Body shall first consult the Directors on the issue;

5.5.2.1.4. manage any claims and disputes with staff members on behalf of the Company having regard to any advice and recommendations given by the Directors; and

5.5.2.2. The Local Governing Body shall ensure that appropriate performance management is carried out on all staff in the Academy.

## **5.6. Curriculum and standards**



5.6.1. The Local Governing Body shall be responsible for the setting and review of the curriculum but shall have due regard to any views of the Directors in recognition of the Company's obligation to the Secretary of State to provide a broad and balanced curriculum.

5.6.2. The Local Governing Body shall be responsible for the standards achieved by the Academy and the pupils attending the Academy but shall follow such advice and recommendations of the Directors as they might issue from time to time.

5.6.3. The Local Governing Body shall be responsible for the setting and review from time to time of the Academy's admissions policy provided that no change will be made to the admissions criteria without the consent of the Directors.

5.6.4. Any decision to expand the Academy shall be that of the Directors but who shall have due regard to the views of the Local Governing Body.

### **5.7. Extended schools and business activities**

5.7.1. Whilst the undertaking of any activities which would be described as part of the Academy's 'extended schools agenda' or any activities designed to generate business income, would be the responsibility of the Local Governing Body, this shall only be undertaken in a manner consistent with any policy set by the Directors and having regard to the viability of such activities, the impact on the Academy's activities and any financial implications, such as the threat of taxation in light of the Company's charitable objects and any threat to funding provided by the Secretary of State.

5.7.2. Any proposed activity which may or shall result in establishing a separate trading company shall be reserved to the Directors.

### **5.8. Regulatory matters**

5.8.1. The responsibility for the satisfaction and observance of all regulatory and legal matters shall be the Directors but the Local Governing Body shall do all such things as the Directors may specify as being necessary to ensure that the Company is meeting its legal obligations.

## **6. Operational matters**

6.1. The Local Governing Body will adopt and will comply with all policies of the Directors communicated to the Local Governing Body from time to time.

6.2. Both the Directors and all Governors of the Local Governing Body have a duty to act independently and not as agents of those who may have appointed them and will act with integrity, honesty and objectivity in the best interests of the Company and the Academy and shall be open about decisions and be prepared to justify those decisions except in so far as any matter may be considered confidential.

6.3. The Local Governing Body will review its policies and practices on a regular basis, having regard to recommendations made by the Directors from time to time, in order to ensure that the governance of the Academy is best able to adapt to the changing political and legal environment.

6.4. The Local Governing Body shall provide such data and information regarding the business of the Academy and the pupils attending the Academy as the Directors may require from time to time.

6.5. The Local Governing Body shall submit to any inspections by the Directors and any inspection by Ofsted.

6.6. The Local Governing Body shall work closely with and shall promptly implement any advice or recommendations made by the Directors.



6.7. In the event that intervention is either threatened or is carried out by the Secretary of State the Directors expressly reserve the unfettered right to review or remove any power or responsibility conferred on the Local Governing Body under this Scheme of Delegation in such circumstances.

## **7. Conflicts**

7.1. In the event of any conflict between any provision of this Scheme of Delegation and the Articles, the Articles shall prevail.

## **8. Annual review**

8.1. The Scheme of Delegation shall operate from the Effective Date and shall in respect of each Academy.

8.2. The Directors will have absolute discretion to review this Scheme of Delegation at least on an annual basis and to alter any provision of it.

8.3. In considering any material changes to this Scheme of Delegation or any framework on which it is based, the Directors will have regard to and give due consideration of any views of the Local Governing Bodies.



## APPENDIX N

### Summary delegation of decision making authorities and responsibilities

Area	Ref	Task	Trust Board	Delegated to GB	Princ.	Note
Finance	1.1	Approve formal budget for each financial year	X			
	1.2	Monthly monitor expenditure		X	X	
	1.3	Investigate financial irregularities	X			
	1.4	Enter into contracts	X		X	
	1.5	Sign off contracts	X	X	X	
	1.6	Make payments	X	X		
	1.7	Establish charging policy	X			
	1.8	Establish delegation scheme	X			
	1.9	Appoint auditors	X			
	1.10	Appoint Responsible Officer (RO)	X			
Staffing	2.1	Appoint Principal	X	X		
	2.2	Appoint leadership team		X	X	
	2.3	Appoint teaching staff		X	X	
	2.4	Appoint support staff		X	X	
	2.5	Agree pay policy	X			
	2.6	Pay recommendation for staff			X	
	2.7	Pay recommendation for HoS	X	X		
	2.8	Establish HR/Personnel policies & procedures	X			
	2.9	Dismiss HoS	X			
	2.10	Dismiss other staff	X	X		
	2.11	Suspend HoS	X			
	2.12	Suspend staff	X	X		



	2.13	End suspension of HoS	X			
	2.14	End suspension of staff	X	X		
	2.15	Determine dismissal payment/capability procedures	X			
	2.16	Determine staffing structure		X	X	
	2.17	Establish disciplinary/capability procedures	X			
<b>Standards</b>	3.1	Monitor pupil progress, individuals and groups, including setting challenging individual and cohort targets			X	
	3.2	Maintain overview of pupil progress, whole school and groups targets			X	
	3.3	Evaluate the impact of academy on pupil progress vs targets	X	X		
<b>Curriculum inc RE</b>	4.1	Ensure agreed curriculum is taught		X	X	
	4.2	Draft curriculum policy inc RE	X			
	4.3	Implement curriculum policy inc SRE & RE			X	
	4.4	Monitoring and evaluating curriculum policy and outcomes		X	X	
	4.5	Responsible for standards of teaching			X	
	4.6	Changing length of school day or holiday pattern	X			
	4.7	Responsibility for individual child's education			X	
<b>Appraisal</b>	5.1	Establish appraisal policy (link with capability policy) and keep under review.	X			
	5.2	Implement appraisal/capability of Principal	X			
	5.3	Implement appraisal/capability of staff			X	
<b>Behaviour and conduct</b>	6.1	Establish academy behaviour code; keep under review; monitor its effectiveness		X		
	6.2	Implement behaviour code			X	





	6.3	Exclude pupils for one or more fixed terms (not more than 45 days in one year) or permanently exclude			X	
	6.4	Review pupil exclusions (pupil discipline committee)		X		
	6.5	Direct re-instatement of pupil	X	X		
<b>Admissions</b>	7.1	Consult annually before setting an admissions policy	X			
	7.2	Applications decisions		X		
<b>Collective worship</b>	8.1	Ensure requirements are met			X	
<b>Premises</b>	9.1	Insure buildings	X			
	9.2	Premises Plan		X	X	
	9.3	Health and safety requirements met		X	X	
<b>Improvement Plan</b>	10.1	Draft improvement plan			X	
	10.2	Approve plan	X			
<b>Local Governing Bodies</b>	11.1	Appoint/remove Chair of Governors	X			
	11.2	Appoint majority of governors	X			
	11.3	Remove governors	X			
	11.4	Appoint/dismiss clerk	X			
	11.5	Establish register of governors' business interests		X		
	11.6	Ensure conflicts of interest are disclosed and recorded at each meeting.		X		
	11.7	Establish scheme of delegation	X			
	11.8	Hold a meeting of the local governing body at least once per term		X		
	11.9	Approve and set up governors expense scheme	X			
<b>School organisation</b>	12.1	Set times of school day and term dates		X		
	12.2	Ensure the academy meets for 380 sessions in each academy year			X	



<b>Information for parents</b>	13.1	Ensure that statutory information is published on the academy website			X	
	13.2	Ensure provision of free school meals to those pupils meeting the criteria		X	X	
	13.3	Ensure that the academy prospectus is updated annually			X	
<b>Insurance</b>	14.1	Decide insurance provider	X			

Note that the CEO of the Company can exercise their right to act on behalf of the Company in taking on any of the duties delegated to the GB or Principal should the need arise.