

Financial Procedures Policy

Signed:

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Statement of intent

Chesterton Community Sports College, Bursley Academy, Chesterton Primary School, Churchfields Primary School and Crackley Bank Primary School - referred to as Collective Vision Trust (formerly Chesterton Academy Trust)

As a Trust we strive to be at the heart of our community, actively promoting community cohesion, sharing our facilities with other academies and the wider community.

The fact that pupils are encouraged to achieve their potential is embedded throughout the academy trust. The performance of pupils is carefully tracked and achievements celebrated, not only in academic subjects but across a much wider curriculum. It is the intention of the Trust to develop a curriculum that provides depth and breadth to its pupils' which particularly focuses on our local community, national and international links.

It is important for Collective Vision Trust to demonstrate that they do not benefit personally from decisions they make with regards to the spending of public money. To ensure that the financial standing of the trust cannot be brought into disrepute, this policy will be implemented by all academies within the trust, guaranteeing consistency in financial procedures across the academies.

This policy applies to all employees in the trust, trustees and members, as well as services and goods sourced from external agencies, such as contractors and caterers.

The trust takes its responsibility for handling public funds with the utmost importance and strives to continuously provide a high-quality education and safe learning environment, whilst having a strong financial standing.

The purpose of this policy is to ensure that the academy trust maintains and develops systems of financial control which conforms 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).

The Trust will comply with 'Academy Trust Handbook' published by the DfE. This policy expands on that and provides detailed information on the academy trust's financial procedures and systems.

1. Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- Employment Relations Act 1999
- Companies Act 2006
- Equality Act 2010
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- ESFA 'Academy trust handbook
- ESFA 'Declare or seek approval for related party transactions: summary guidance'

This policy operates in conjunction with the following policies:

- Teachers' Pay Policy
- Charging and Remissions Policy
- Conflicts of Interest Policy
- Tendering and Procurement Policy
- Gifts, Hospitality and Anti-bribery Policy
- Data Protection Policy
- Anti-fraud and Corruption Policy
- Whistleblowing Policy
- Cyber-security Policy
- Cyber Response and Recovery Plan
- Declared Conflicts of Interests Register
- Articles of Association

2. Roles and responsibilities

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

Role of Members:

- Appointing, by special resolution, new members or removing existing members.
- Where necessary, by special resolution, issuing direction to the trustees to take a specific action, in line with the trust's Articles of Association.
- Appointing the trust's auditors (external and internal) and receiving (but not signing) the trust's audited annual accounts.
- Conducting the business of the trust in accordance with company and charity law and adhering to the trust's funding agreement with the Secretary of State.

The trust will ensure that members are not currently subject to a section 128 direction and will not appoint anyone as a member if they are currently subject to a section 128 direction.

Role of Trustees:

Have overall responsibility and are the ultimate decision-making authority for the administration of the academy trust's finances. The main responsibilities of the Trustees are prescribed in the Funding Agreement between the academy and the DfE.

The board of trustees are responsible for:

- Applying the highest standards of conduct and governance and taking full ownership of their duties
- Ensuring the board meets at least three times a year and conducts business only when quorate

- Approving a written scheme of delegation of financial powers
- Managing conflicts of interest and related party transactions
- Approving a balanced budget for the financial year and minuting the approval
- Ensuring decision about executive pay follow a robust evidence-based process reflecting the individual's role and responsibilities, and that the approach to pay is transparent, proportionate and justifiable.
- Appointing and audit and finance policy to advise on the adequacy of the trust's controls and risks
- Submitting audited accounts to ESFA by 31st December
- Ensuring an appropriate, reasonable and timely response is given to findings by auditors

Role of Finance and Audit Committee (See full terms of reference for Finance and Audit committee)

The main responsibilities include:

- Directing the trust's programme of internal scrutiny and reporting to the board on the adequacy of the trust's financial and other controls and management of risks.
- Ensuring that risks are being addressed appropriately through internal scrutiny.
- Reviewing the external auditor's plan each year.
- Reviewing the annual report and accounts.
- Reviewing the external auditor's findings and actions taken by the trust's managers in response to those findings.
- Assessing the effectiveness and resources of the external auditor to provide a basis for decisions by the trust's members about the auditor's reappointment or dismissal or retendering.

Role of Chief Executive Officer (CEO) and Accounting Officer (AO)

The Trust Handbook states that Directors must appoint a named Accounting Officer who is the senior executive leader – that is the CEO.

The Accounting Officer is personally responsible to Parliament and must be able to assure Parliament and the public of high standards of probity in the management of public funds.

Within the framework of the scheme of delegation as approved by Directors, the CEO has overall executive responsibility for the academy trust's activities including financial activities. The majority of the financial responsibility has been delegated to the Deputy CEO (DCEO), Chief Finance Officer (CFO) and Trust Accountant (TA) but the CEO still retains responsibility for:

- Sharing the ESFA's '[Letter to academy trust accounting officers](#)' letter with the members, trustees, the DCEO, CFO, TA and other members of SLT, arranging for it to be discussed by the board of trustees and taking action, where appropriate, to strengthen the trust's financial systems and controls.
- Achieving value for money and the best possible educational outcomes through the economic, efficient and effective use of resources.
- Ensuring regularity when dealing with items of income and expenditure in accordance with legislation, the terms of the trust's funding agreement and the 'Academy Trust Handbook' (ATH), and with the trust's internal procedures.
- Ensuring propriety with regards to expenditure and receipts, including standards of conduct, behaviour and corporate governance.
- Completing and signing a statement of regularity, propriety and compliance each year and submitting this to the ESFA with the audited accounts.
- Keeping full and accurate financial records.
- The management of opportunities and risks.
- Assuring the board of trustees that the trust is compliant with the ATH and the funding agreement.
- Informing the board of trustees, in writing, of any action or policy under consideration that is incompatible with the terms of the Articles of Association, funding agreement or the ATH.
- Informing the ESFA, in writing, where they have advised the board of trustees that they are in breach of the Articles of Association, funding agreement or ATH but the board has continued with their actions.
- Approving new staff appointments with the authorised establishment.
- Authorising orders / contracts in conjunction with the DCEO/CFO/Headteacher.
- To ensure, as Accounting Officer, robust financial systems are in place so that the Trust's funds are used properly, efficiently and effectively.

A detailed description is set out in the Statement of Roles and Responsibilities document.

Role of Deputy Chief Executive Officer (DCEO)

The Deputy Chief Executive Officer is responsible for:

- The management of the academy trust and individual academies financial position at a strategic and operational level within the framework for financial control determined by Directors.
- Being the main link between the CEO, Headteachers, CFO, TA and Directors and ensures that the Trust has robust financial systems that are used properly and efficiently and provides good value for money.
- Ensuring that the trust's financial position is managed at a strategic level within the framework for financial control determined by the board.
- Ensuring that all financial matters focus on the wider needs of the trust, rather than on any individual academy.

A detailed description is set out in the Statement of Roles and Responsibilities document.

Role of Chief Finance Officer (CFO)

The CFO works in close collaboration with the CEO, DCEO, Headteachers and TA through whom is responsible to the Trustees. The CFO has direct access to the Trustees via the Finance and Audit Committee. The Chief Finance Officer is responsible for:

- Acts as the principal finance officer for the trust.
- Overseeing the finances of the academy trust, including its academies and scrutinising the detail
- The day-to-day management of financial systems including the academy trust's financial software system and internal procedures and controls
- Ensuring effective financial policies are in place across the trust.
- Liaising with the headteacher and finance assistant from each academy on financial matters.
- Challenging finance staff to ensure that value for money is routinely obtained.
- Ensuring forms and returns are sent to the DfE and ESFA in line with the timetable in the DfE guidance.
- Maintaining CPD and undertaking relevant ongoing training.

A detailed description is set out in the Statement of Roles and Responsibilities document.

Role of Trust Accountant (TA)

The TA works in close collaboration with the CEO, DCEO, Headteachers and CFO through whom is responsible to the Trustees. The TA has direct access to the Trustees via the Finance and Audit Committee. The Trust Accountant (TA) is responsible for:

- The maintenance of effective systems of internal control and risk review programme.
- Ensuring the annual accounts are properly presented and adequately supported by the underlying books and records of the trust.
- The preparation of monthly management financial reports.
- In collaboration with the CFO, work with internal auditors to provide assurance to the finance and audit committee and board of trustees.
- Preparation and submission of quarterly VAT returns on behalf of the Trust as determined by HMRC timetable.
- Maintaining CPD and undertaking relevant ongoing training.

A detailed description is set out in the Statement of Roles and Responsibilities document.

The ESFA will be informed within 14 calendar days if the trust appoints or terminates the contract of:

- An accounting officer or CFO, including their contact information.
- A chair of trustees, including their contact information.
- A member, trustee or governor, including their contact information.
- A headteacher, including their contact information.
- A chair of a local governing committee, including their contact information.
- A local governor.

Other Staff

All staff are responsible for the security of academy 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 trust's financial procedures.

3. Financial oversight

The trust takes full responsibility for its financial affairs, stewardship of assets and use of resources to maximise pupils' outcomes. The board of trustees meets in full at least three times a year and the finance and audit committee meet at least six times a year. Additional meetings are called as and when required. Between meetings the Trustees have access to the monthly management accounts via the CVT Governance Portal and examine and question these.

The board of trustees does not delegate overall responsibility for the trust's funds. The board of trustees approves a written scheme of delegation of financial powers that maintains robust internal controls. This scheme of delegation is reviewed **annually**, and immediately when there has been a change in the trust's management or organisational structure.

The board of trustees' delegates financial scrutiny and oversight to the finance and audit committee, which can support the board in maintaining the trust as a going concern.

Constituent academies joining the trust will be asked to complete a financial management and governance self-assessment.

4. Annual Budget Setting

The budget is a working document which may need revising throughout the year as circumstances change. Any significant revisions will be reported to the Finance and Audit Committee and Directors.

The CFO and TA are responsible for preparing and obtaining approval for the annual MAT budget and supporting the academy finance staff to prepare the budget and to obtain Board approval. Academy finance staff in conjunction with the Headteacher are responsible for preparing the individual academies budget. In collaboration, the budget is approved by the CEO, CFO, relevant Headteacher, Finance and Audit Committee and Directors.

The annual budget reflects the best estimate of the resources available to the academy for the forthcoming year and details how those resources are to be utilised. There is a link between the academy development plan objectives and the budget utilisation of resources.

The budget planning process takes the following elements into account:

- Forecasts of likely pupil numbers to estimate the amount of DfE grant available
- Review of other income sources available to assess likely level of receipt
- Review of past performance against budgets to promote understanding of the academy cost base
- Identification of potential efficiency saving
- Review of the main expenditure headings in light of the academy improvement plan objectives and the expected variations in cost e.g., pay increases, inflation and other anticipated changes.

Balancing the budget

Comparison of estimated income and expenditure will identify any potential surplus or shortfall in funding. If shortfalls are identified, opportunities to increase income would be explored and expenditure headings will be reviewed for areas where savings 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, in any of the academies, this will be held back as a contingency or alternatively allocated to areas of need within that academy.

Finalising the Budget and Approval

Once the different scenarios have been considered, a draft budget is prepared by relevant academy finance staff CFO and TA for approval by the CEO, DCEO, relevant Headteacher, the Finance and Audit Committee and Directors. The budget for departments is communicated to relevant staff with advice relating to overall budgetary constraints. The budget is seen as a working document which may need revising throughout the year as circumstances change.

Once the budgets have been approved by the board of trustees, this approval will be minuted.

Both medium-term and short-term financial plans are prepared for the trust and each of the academies within the trust. The medium-term plan indicates how the educational aims and other objectives of the trust and each academy are going to be achieved within the expected level of resources over the next three years.

See Appendix 2 for budget cycle

5. Budget management, monitoring and review

The TA will prepare monthly management accounts, setting out the trust's financial performance and position and including an income and expenditure account, variation to budget report, cash flow information and balance sheet, income analysis for each academy and financial efficiency checks. A monthly report details commentary from academy finance staff on actual income and expenditure against budget. The report is at a summary level and discussed with the CEO, DCEO, CFO and relevant Headteacher.

Management accounts are reported to Directors monthly via the CVT Governor Portal and questions can be answered between meetings and this scrutiny formally reviewed six times a year by the Finance and Audit Committee and by Directors at their termly meeting.

Any potential overspend against the budget will be discussed with the CEO, DCEO, CFO and relevant Headteacher.

The monitoring process will be effective and timely in highlighting variances in the budget so that differences can be investigated, and action taken where appropriate. The finance and audit committee will continually monitor the quality of the financial information presented to them to ensure that what is provided remains appropriate, particularly in terms of its timing, level of detail and narrative.

It may be appropriate to vire money from another budget or from the contingency. All budget virements will be in accordance with the Scheme of Delegation.

Health Warning: *Virements can be misleading when an historical view of a budget is taken. It may be more appropriate to make a temporary journal of funds.*

The trust will submit a budget forecast return (BFR) to the ESFA. The trust's budget forecast return outturn information will be included in the budget forecast return, which covers:

- September to March and April to August (previous year)
- September to March and April to August (current year)
- Summary forecasts for September to August (forecast year)
- Summary forecasts for September to August (forecast year)

The budget forecast returns will be prepared by TA, approved by the board of trustees prior to submission by CFO to the ESFA.

6. Accounting System and Cash management

Accounting system

All academies within the trust use Access Finance to record their main day to day financial operations and transactions. The financial system runs on a cloud based sever and link each of the academy sites via a shared general purchase ledger, feeding into one main bank account. Each academy records separately its own transactions against individual balance sheets and enables individual academy to retain their own budgets and balances which allows for monitoring at individual

academy level as well as trust. Within the financial software a separate chart of accounts records the central costs of the trust. This records the central contribution from each academy and also the costs associated with the MAT central services.

Access Finance is operated by finance teams within each individual academy and consists of:

- Requisitions and orders
- Invoices
- Purchase credit note
- Multipay card expenses
- Direct debit expenses
- Sales Invoices
- Sales credit notes
- Journals
- Nominal Ledgers – shared across the MAT but transactions recorded at academy level
- Bank Reconciliation – one for the trust
- Cashbook – one for the trust
- Inter Company Transfers – to record transactions across different academies within the trust
- Reporting Structures – at individual academy level and as one for the MAT

System Access

Entry to Access finance and budgeting software is password restricted and the CFO is responsible for adding users and setting access levels dependent on role required via the CFO's system administrator function.

Transaction Processing

All transactions input to the accounting system must be authorised in accordance with the procedures specified in this policy. The detailed procedures for ordering are included in the following sections of this manual. Journal entries are only recorded by finance staff for the relevant academy. Bank transactions are undertaken by the CFO and finance staff and input checked at bank reconciliation.

Detailed information on the operation of Access Finance can be found in the user manuals on The Access Group website.

Income

The main source of income for the Trust are grants from the DfE. The receipt of these is monitored by the CFO who is responsible for ensuring that all grants due to the academies within the trust are appropriately collected.

The trust also collects income from a number of methods including, but not limited to, the following:

- Meals, trips and residential visits, extra-curricular activities, minibus service
- Book bags and uniform
- Additional nursery places, breakfast clubs, music tuition
- Donations from the public plus external organisations and for letting activities

The academies within the trust operate a cashless system and all parental payments are made via 'Parentpay'. Weekly Parentpay statements are inputted in to Access Finance system by academy finance staff.

Cash deposits

While the academies are in principle cashless, with payments being managed through Parentpay, there are occasionally some exceptions. Exceptions to cashless policy are that certain one-off events that require academies to accept cash, e.g. charity events and fund-raising activities.

Particulars of any bank deposit must be entered on a paying in slip to the appropriate account and should include the amount of deposit and entered into Access Finance system, along with supporting information. Monies collected will be banked in their entirety in the appropriate bank account.

Transaction Reports and reconciliations

Reconciliations of the following are performed monthly:

- Aged debtor
- Aged creditor
- Bank reconciliation as per the nominal ledger to the bank statement

Lettings

The finance staff at individual academies are responsible for maintaining records of lettings and for identifying the sums due from each organisation. Payments are made in arrears for the use of facilities and charged for via creation of a sales invoice from Access Finance accounting software.

Full details of the Trust's policy for lettings are set out in Lettings Policy. The policy and charges will be reviewed annually and approved by Directors.

Storage and Retention

Supporting financial documents (e.g. invoices, VAT returns, bank statements) will be held for 6 years plus the current year.

Academy Development Plans

The academies development plans are concerned with the future aims and objective of the academy and how they are to be achieved, this includes matching the academy's objectives and targets to the resources expected to be available. Plans are kept relatively simple and flexible and are drawn up around the predicted resources. They are the 'big picture' within which more detailed plans may be integrated.

Routinely, SLT of each academy undertake an evaluation of the planning cycle and reports to Directors. These reports form part of the Headteacher's Report and includes:

- A review of past activities, aims and objectives – "did we get it right?"
- Definition or redefinition of aims and objectives – "are the aims still relevant?"
- Development of the plan and associated budgets – "how do we go forward?"
- Implementation, monitoring and review of the plan – "who needs to do what by when to make the plan work and keep it on course" and
- Feedback into the next planning cycle – "what worked successfully and how can we improve?"

The plan specifies timescale for completion and also the staff responsible.

The completed development plan includes detailed objectives for the coming academic year and outlines objectives for longer term projects. The plan also includes estimated resource costs, both capital and revenue, if these fall outside existing budgets and resources, associated with each objective and success criteria against which achievement can be measured.

The CEO/DCEO and relevant Academy Headteacher takes overall responsibility for achieving the objectives set out in the Academies Development Plans. The CEO/DCEO and relevant Academy Headteacher regularly monitors progress against objectives and updates the plan as appropriate. A report on progress is given to Directors on a termly basis as part of the CEOs report to Trustees/Governors.

Bank Accounts

The trust has robust procedures in place to manage its cash position and will avoid becoming overdrawn on any of its bank accounts so that it does not breach restrictions on borrowing.

The opening of accounts is authorised by Directors. The CFO oversees the operation of accounts; including any transfers between accounts, cheque signing arrangements and operation of systems such as BACS which require signature from authorised staff in line with the scheme of delegation.

Authorising signatory – Access Finance

The headteacher is the authorising signatory in a academy, unless otherwise delegated in the scheme of delegation.

Multipay Card Account

Multipay cards linked to a trust bank account are issued to personnel under the scheme of delegation to pay for goods and services when the normal ordering processes are not possible. The procurement of goods and services using such cards will be kept to a minimum and monitored by the trust's CFO.

Full details regarding the use of the Multipay card can be found in CVT Multipay Policy.

Administration

The CFO will ensure bank statements are received regularly and reconciliations are performed on a monthly basis in conjunction with the academy finance staff and TA. Reconciliation procedures will ensure that:

- All bank accounts are reconciled to the trust's cash book
- Reconciliations are subject to an independent review carried out by the RO
- Adjustments arising are dealt with promptly.

Cash Flow Forecasts

The TA in conjunction with the CFO will prepare cash flow forecasts to ensure that the trust has sufficient funds available to cover day-to-day operations. If significant balances can be foreseen, steps will be taken to invest the extra funds. Similarly plans will be made to transfer funds from another bank account (if invested) or to re-profile budgets to cover potential cash shortages.

7. Record keeping

All financial transactions of the trust are recorded including, but not limited to, the following:

- Purchases and tenders
- Returns
- Payroll
- Cash flow
- Income and expenditure
- VAT returns

The CFO and TA are responsible for keeping up-to-date records of the trust's financial state. The academy finance staff are responsible for keeping up-to-date records in relation to the finances of their academy.

Records may include the following information:

- Income and expenditure; identifying which transactions were cheques, cash payments and payments via ParentPay.
- The income and expenditure for each activity, with the activity recorded as a cost centre heading
- A copy of any supporting evidence e.g., quotations, goods received notes, invoices for a transaction undertaken in Access Finance accounting software, uploaded to the relevant purchase order and/or journal number.

Each academy has its own set of financial records for day-to-day operational purposes and budget management.

A record will be kept of all the monies kept on the premises prior to banking (if applicable), and stored in the cash safe. All financial records will be kept securely in each academy's office.

8. Staff Appointments and Payroll

Staff Appointments

Directors have approved a staffing structure for the Trust. Changes will only be made to this structure with approval of the Finance and Audit Committee who must ensure that adequate budgetary provision exists for any establishment changes.

The CEO/DCEO in conjunction with the Academy Headteacher and the Trustees/Governors has authority to appoint staff within the authorised establishment (see different levels of authority within the scheme of delegation). The Trust maintains personnel files (newer files are held electronically) for all members of staff which include contracts of employment. All personnel changes should be notified to the central HR team immediately.

Payroll Administration

The trust has purchased payroll administration from The Access group. All payroll transactions relating to trust staff, permanent or casual, will be processed through this payroll system. Payments for employment will not be made through any other mechanism.

Each academy within the trust will act in accordance with the Pay Policy.

The main elements of the payroll system include staff appointments, payroll administration and payments. Payroll is notified by academy finance staff of any staff absence using the Access People system and any appropriate deductions are made.

The CFO/TA in conjunction with academy finance staff are responsible for ensuring that:

- Payments are made only to bona fide employees.
- Payments are in accordance with individuals' conditions of employment.
- Deductions, including income tax, NI and pensions, are properly administered.
- Payments are made only in respect of services provided to the academy.
- Amendments to the payroll are properly processed and authorised.

The CFO in collaboration with the academy finance staff, are responsible for keeping the staff personnel database up-to-date via Access People. This will include the following information about staff members:

- Salary
- Bank account details
- Taxation status
- Personal details
- Any deductions or allowances payable

Any claims for additional hours/expense claim forms will be submitted to Access People and approved by the relevant Line Manager/Headteacher.

Payroll Payments

After Access Payroll have processed the payroll but before payments are dispatched a suite of reports for each academy are uploaded onto the Trusts Collaborate secure site. Each payment is checked and any amendments uploaded onto the Collaborate secure site for Access payroll to action. The salary payment file is authorised by the CFO or academy finance staff at each academy and confirmation emailed to CFO. All salary payments are made by BACS, which are authorised by the CFO.

The payroll system automatically calculates the deductions due from payroll and complies with current legislation. The major deductions are for tax, National Insurance contributions and pensions. The amounts payable is summarised on the payroll reports from Access Payroll. The Access group make the BACS payments to HMRC for tax & National Insurance, Teachers Pension and LGPS Pensions – the BACS is signed off by the CFO.

Executive pay

The board of trustees will ensure that executive pay (including salary and any other benefits), follow a robust evidence-based process and are a reasonable and defensible reflection of the individual's role and responsibilities. No individual will be involved in deciding their salary.

The board of trustees will discharge its responsibilities effectively, ensuring its approach to pay and benefits is transparent, proportionate and justifiable, including:

Process – that the procedure for determining executive pay and benefits is agreed by the board in advance and documented. The board ensures that both pay and benefits are kept proportionate.

- **Independence** – decisions about executive pay and benefits reflect independent and objective scrutiny by the board and conflicts of interest are avoided.
- **Robust decision-making** – factors in determining pay and benefits are clear, including whether educational and financial performance considerations, and the degree of challenge in the role, have been considered.
- **Proportionality** – pay and benefits represent good value for money and are defensible relative to the public-sector market.
- **Commercial interests** – the board is sighted on broader business interests held by senior executives, and is satisfied that any payments made by the trust to executives in relation to such interests do not undermine the transparency requirements for disclosing pay in accordance with the Academies Accounts Direction.
- **Documentation** – the rationale behind the decision-making process, including whether the level of pay and benefits reflects value for money, is recorded and retained.

A basic presumption that executive pay and benefits should not increase at a faster rate than that of teachers, in individual years and over the longer term.

Understanding that inappropriate pay and benefits can be challenged by the ESFA, particularly in any instance of poor financial management of the trust.

The trust publishes on its website, in a separately readily accessible form, the number of employees whose benefits exceeded £100,000, in £10,000 bandings for the previous year ended 31 August. Benefits for this purpose include salary, the trust's pension contributions, other taxable benefits and termination payments., but not the trust's own pension costs. For employees who are trustees, their salary and other benefits will also be disclosed in £5,000 banding in the trust's financial statements.

Where the trust has entered into an off-payroll arrangements with someone who is not an employee, the amount paid by the trust for that person's work will also be included in the website disclosure where payment exceeds £100,000, as if they were an employee.

Information about the gender pay gap in the MAT is published on the trust's website and on the government's reporting [Gender Pay Gap Reporting](#).

9. Purchasing and Procurement

The trust will ensure:

- Spending has been for the purpose intended and there is probity in the use of public funds.
- Spending decisions represent value for money.
- Internal delegation levels exist and are applied.
- Professional advice is obtained where appropriate.

All academies within the trust will act in accordance with the trust's Tendering and Procurement Policy, and comply with the procurement rules and thresholds in The Public Contracts Regulations 2015 and [Find a Tender](#) service.

The trust uses the DfE's deals for schools service where possible.

Full details of the trust's procurement processes are outlined in the Tendering and Procurement Policy.

See Appendix 3 for purchasing limits and Appendix 4 for ordering process

10. VAT procedures

The trust, and the academies within it, are registered for VAT and are entitled to reclaim VAT on qualifying purposes through a VAT return.

Under legislation, VAT claims can be made on expenditure which supports the trust's core business purposes.

A report is run for each of the academies within the trust by the TA, to provide the data necessary for the completion of the VAT reclaim form. VAT is reclaimed quarterly. Only one return for the trust is required by HMRC.

The trust is eligible to reclaim most of the VAT it pays on invoices from HMRC. Any invoices for which VAT cannot be reclaimed, as the purchases were for business activity, are identified and not claimed for.

Where invoices relate partly to business activity and partly to non-business activity, only the proportion of the VAT relating to the non-business activity will be reclaimed.

Reclaimed VAT will not be debited to the individual academies, but to the VAT control account of the trust.

On receipt of the reclaimed VAT from HMRC, the CFO will reconcile the payment received to the claim made.

11. Fixed assets

The trust will obtain prior approval from the ESFA for the following transactions:

- Acquiring a freehold of land or buildings
- Disposing of a freehold of land or buildings
- Disposing of heritage assets, as defined in financial reporting standards, beyond any limits in the trust's funding agreement for the disposal of assets generally

Other than the transactions outlined above, the trust does not need the ESFA's approval to dispose of any other fixed assets.

Any disposal will maintain the principles of value for money, regularity and propriety.

The board of trustees will refer to the DfE's ['Good estate management for schools'](#) guidance to help them to manage capital assets and budgets.

Asset Register

All items purchased with a value over the academy's capitalisation limit of £1,000 are to be entered in an asset register. The asset register includes the following information.

- Asset description
- Serial number
- Date of acquisition
- Asset cost
- Expected useful economic life
- Depreciation
- Current book value
- Location

The Asset Register helps:

- Ensure that staff take responsibility for the safe custody of assets
- Enable independent checks on the safe custody of assets, as a deterrent against theft or misuse
- To manage the effective utilisation of assets and to plan for their replacement
- Help the external auditors to draw conclusions on the annual accounts and the academy's financial system

- Support insurance claims in the event of fire, theft, vandalism or other disasters and it will inform the re-equipment of the academy in the event of a significant disaster.

Security of assets

All the items in the register will be permanently and visibly marked as the academy's property. Inventories of academy property will be kept up to date and reviewed regularly.

Loan of Assets

Items of academy property will not be removed from academy premises without the authority of the Headteacher. Exceptions to this are portable ICT equipment (eg laptops, I-pads) which are issued to staff and pupils with the intention that they can be used off premises in order that they can fulfil their duties. The ICT manager keeps records of this equipment and the member of staff responsible for it, assets are collected when member of staff leaves the trust.

12. Gifts and hospitality

The Gifts, Hospitality and Anti-bribery Policy sets out the trust's procedures relating to the acceptance of gifts, hospitality, awards, prizes and any other benefit that might be seen to compromise the judgement or integrity of the trust.

13. Charging and remissions

Each academy will act in accordance with the Trust's Charging and Remissions Policy at all times. Charging is permitted for education provided out of academy hours, unless it is within the requirements of the national curriculum or to fulfil statutory duties relating to RE.

Full details regarding charges and remissions can be found in CVT Charges and Remissions Policy.

14. Leasing

For the purpose of this policy, there are two types of lease:

- Finance lease – a form of borrowing
- Operating leases – not a form of borrowing

The trust will obtain prior approval from the ESFA for the following lease transactions:

- Taking up a finance lease on any class of asset for any duration from another party, which are subject to borrowing restrictions
- Taking up a leasehold or tenancy agreement on land or buildings from another party for a term of seven or more years
- Granting a leasehold interest, including a tenancy agreement, of any duration, on land and buildings to another party

Any lease will maintain the principles of value for money, regularity and propriety.

15. Investments

Where the board of trustees wishes to make investments to further the trust's charitable aims, it will ensure that investment risks are properly managed.

Prior approval will be sought from the ESFA before all investment transactions that are novel, contentious and/or repercussive, regardless of value.

Details of the trust's investment strategy are outlined in the Reserves and Investment Policy.

16. Risk management

The trust maintains a risk register and manage risks to ensure its effective operation, including contingency and business continuity planning.

The board of trustees take overall responsibility for risk management, including ultimate oversight of the risk register, while drawing on advice provided to it by the finance and audit committee. The board of trustees review the risk register termly.

Risk management covers the full operations and activities of the trust, not only financial risks.

The trust purchases adequate insurance cover in compliance with its legal obligations.

The trust will cooperate with risk management auditors and risk managers and implement any reasonable recommendations made to them.

17. Annual accounts

The trust will maintain accounting records and prepare an annual report and audited accounts in line with the Charity Commission's [Statement of Recommended Practice](#) and the ESFA's '[Academies Accounts Direction](#)'.

The audited accounts will be:

- Submitted to the ESFA by 31 December each year.
- Published on the trust's website by 31 January.
- Filed with Companies House in accordance with company law requirements, usually by 31 May.
- Provided to every member (under the Companies Act).
- Provided to anyone who requests a copy.

All copies of the accounting audit will be stored and filed securely, in line with the trust's Data Protection Policy and financial record retention requirements.

18. Auditing

The trust will follow a tiered approach to internal control, risk management and assurance processes comprising:

- Clearly communicated procedures, structures and training of staff.
- Appropriate day-to-day supervision and checks by management.
- Internal scrutiny overseen by an audit and risk committee.
- External audit and assurance.

Internal scrutiny (Responsible Officer – RO)

Internal scrutiny will be conducted by an external Responsible Officer appointed by the Trustees and directed by the finance and audit committee, alongside the work of an external auditor, the RO is to provide independent assurance to the board that its financial and other controls, and risk management procedures, are operating effectively.

Internal scrutiny will focus on:

- Evaluating the suitability of, and level of compliance with, financial and non-financial controls, including assessing whether procedures are designed effectively and efficiently, and checking transactions to confirm whether agreed procedures have been followed.
- Offering advice and insight to the board on how to address weaknesses in financial and non-financial controls.
- Ensuring all categories of risk are being adequately identified, reported and managed.

The programme of internal scrutiny will be covered by a scheme of work, driven and agreed by the audit and risk committee, and informed by risk. The programme of work will be spread appropriately over the year to ensure higher risk areas are reviewed in good time, detail of which is in Appendix 6.

With reference to its risk register, the trust will identify on a risk basis the areas it will review each year and modify its checks accordingly.

Internal scrutiny will take account of output from other assurance providers to inform the programme of work. Independence in internal scrutiny will be achieved by establishing appropriate reporting lines whereby those carrying out checks report directly to a committee of the board.

Internal scrutiny will be kept under review and if any changes in size, complexity or risk profile become apparent, the trust will consider whether its approach remains suitable.

The trust will confirm, in its governance statement, the method(s) it uses for internal scrutiny and why these are used.

The trust may also use other individuals or organisations where specialist non-financial knowledge is required. Where this is done, the trust will reflect the individual's or organisation's findings, recommendations and conclusions as part of the summary document submitted to the ESFA.

Findings arising from internal scrutiny will be used to inform the accounting officer's statement of regularity in the annual accounts.

Regular reports of the programme of work will be provided at each audit and risk committee meeting, including recommendations to enhance financial and other controls and risk management.

The trust will submit its annual summary report of the areas reviewed, key findings, recommendations and conclusions to the ESFA by 31 December each year when it submits its audited annual accounts. If requested, the trust will also provide any other internal scrutiny reports.

External auditing

The trust will appoint an external auditor to give an opinion on whether its annual accounts present a true and fair view of the trust's financial performance and position.

The contract with the external auditor will be in writing and be accompanied by a letter of engagement that only covers the details of the external audit including the requirements of the DfE. The letter of engagement will also include details of the removal of external auditors, before the expiry of the term of office, in exceptional circumstances. There will be a separate letter of engagement for additional services beyond the prescribed audit.

The board of trustees will notify the ESFA immediately of the removal or resignation of the auditors.

The accounting officer will produce a statement on regularity, propriety and compliance and this will be included in the trust's annual accounts. The statement on regularity, propriety and compliance will include a responsibility to ensure that:

- There is efficient and effective use of resources in their charge.
- Public money is spent for the purposes intended by parliament.
- Appropriate standards of conduct, behaviour and corporate governance are maintained when applying the funds under their control.

The trust will respond promptly, reasonably and appropriately to any findings by the auditors.

19.Related party transactions

All academies within the trust will act in accordance with the Conflicts of Interest Policy.

The trust will be even-handed in their relationships with related parties by ensuring:

- Compliance with their statutory duties to avoid conflicts of interest, benefits are not accepted from third parties, and interests in proposed transactions or arrangements are declared.
- A Declared Conflicts of Interest Register has been completed.
- No member of the trust uses their connection to the trust for personal gain.
- All payments are permitted by the Articles of Association or by authority from the Charity Commission.
- The Charity Commission approves payments to a trustee where there is a significant advantage to the academy.
- Any payment provided to the persons referred to in the '[At-cost requirements](#)' section of this policy satisfies the 'at cost' requirements.

All transactions with related parties will be reported to the ESFA in advance of the transaction taking place. This applies to transactions made on or after 1 April 2019.

The board of trustees will ensure procedures pertaining to related party transactions are applied across the MAT. The board of trustees and accounting officer will manage personal relationships with related parties to avoid both real and perceived conflicts of interest, promoting integrity and openness in accordance with '[The Seven Principles of Public Life](#)'.

The chair of trustees and the accounting officer will ensure their capacity to control and influence does not conflict with requirements.

The trust recognises that some relationships with related parties may attract greater public scrutiny, such as the following:

- Transactions with individuals in a position of control and influence, including the chair of trustees and the accounting officer
- Payments to organisations with a profit motive, as opposed to those in the public or voluntary sectors
- Relationships with external auditors beyond their duty to deliver a statutory audit

The trust will keep up-to-date records and make sufficient disclosures in their annual accounts to show accordance with the high standards of accountability and transparency required within the public sector.

The trust will report all related party transactions made on or after 1 April 2019 to the ESFA in advance of the transaction taking place. The trust will obtain prior approval from the ESFA for related party transactions that are novel, contentious and/or repercussive, regardless of value, using the ESFA's [enquiry form](#).

'At cost' requirements

The trust will not pay more than 'cost' for goods or services provided by the following:

- Any member or trustee of the trust
- Any individual or organisation related to a member or trustee of the trust, namely:
 - A relative of a member or trustee: defined as a close member of the family, or member of the same household, who may be expected to influence, or be influenced by, the person. This includes, but is not limited to, a child, parent, spouse or civil partner.
 - An individual or organisation conducting business in partnership with the member, trustee or a relative of the member or trustee.
 - A company in which a member or the relative of a member (taken separately or together), and/or a trustee or the relative of a trustee (taken separately or together), holds more than 20 percent of the share capital or is entitled to exercise more than 20 percent of the voting power at any general meeting of that company.
 - An organisation which is controlled by a member or the relative of a member (acting separately or together), and/or a trustee or the relative of a trustee (acting separately or together) – an organisation is controlled by an individual or organisation if that individual or organisation is able to secure that the affairs of the body are conducted in accordance with the individual's or organisation's wishes.
- Any individual or organisation given the right under the trust's Articles of Association to appoint a member or trustee of the trust, or any body connected to the individual or organisation
- Any individual or organisation recognised by the Secretary of State as a sponsor of the trust, or any body connected to the individual or organisation

A body is connected to an individual or organisation if it is controlled by the individual or organisation, controls the organisation, or is under common control with the individual or organisation, namely any of the following:

- Holding a greater than 20 percent capital share or equivalent interest
- Having the equivalent right to control management decisions of the body
- Having the right to appoint or remove a majority of the board or governing body

‘At cost’ requirements do not apply to the trust’s employees unless they are employed by one of the parties outlined in this section. ‘At cost’ requirements apply to contracts for goods and services from a related party agreed on or after 7 November 2013. ‘At cost’ requirements apply to contracts for goods and services from a related party exceeding £2,500, cumulatively, in any one financial year. Where a contract takes the trust’s cumulative annual total with the related party beyond £2,500, the element above £2,500 must be at no more than cost.

If any of the parties outlined in this section are based in, or work from, the trust’s premises, the trust will agree an appropriate sum to be paid to the trust for use of the premises, unless the party is conducting work on behalf of the trust.

‘At cost’ requirements apply to legal advice or audit services when the organisation’s partner directly managing the service is a member or trustee of the trust, but not in other cases.

The trust will ensure that any agreement with an individual or organisation referred to in this section is procured through an open and fair process and is:

- Supported by a statement of assurance from the individual or organisation to the trust confirming their charges do not exceed the cost of the goods or services.
- On the basis of an open book agreement including a requirement for the supplier to demonstrate clearly, if requested, that their charges do not exceed the cost of supply.

The cost will be the full cost of all the resources used in supplying the goods or services and will not include any profit. Full cost includes:

- All direct costs – the costs of any materials and labour used directly in producing the goods or services.
- Indirect costs – a proportionate and reasonable share of fixed and variable overheads.

Declared Conflicts of Interest Register

Members of Directors’ Board and the Academy’s Local Governing Board (the LGB) will manage their affairs in accordance with the high standards detailed in “Guidance on Codes of Practice for Board Members of Public Bodies” and in line with the seven principles of public life as detailed in Appendix 5.

All business and pecuniary interests will be recorded on the Declared Conflicts of Interest Register, including:

- Directorships, partnerships and employments with businesses.
- Trusteeships and governorships at other educational institutions and charities.
- For each interest: the name of the business, the nature of the business, the nature of the interest and the date the interest began.

The Declared Conflicts of Interest Register will identify any relevant material interests from close family relationships between the trust’s members, trustees or local governors. Relevant material interests arising from close family relationships between these individuals and employees will also be identified.

The relevant business and pecuniary interests of members, trustees, local governors and the accounting officer will be kept up-to-date at all times and published on the trust’s website.

20. Borrowing and debt

Prior approval will be obtained from the ESFA before borrowing from any source, where such borrowing will be repaid from grant monies or secured on assets funded by grant monies.

The trust will prepare and monitor financial plans to ensure ongoing financial health.

The trust will disclose aggregate figures for transactions of any amount and separate disclosure for individual transactions above £5,000 in its audited accounts for writing off debts and losses, as well as guarantees, letters of comfort and indemnities.

Debts will not be written off without the express approval from the board of trustees. The trust will also obtain prior approval from the ESFA where it wishes to write off debts and losses, enter into guarantees or letters of comfort, and/or indemnities which are not in the normal course of business, where the following delegated limits apply:

- 1 percent of total annual income or £45,000 (whichever is smaller) per single transaction
- **Trusts that have not submitted timely, unqualified accounts for the previous two financial years, including new trusts that have not had the opportunity to produce two years of audited accounts** - Cumulatively, 2.5 percent of total annual income (subject to a maximum of £250,000) in any financial year per category of transaction
- **Trusts that have submitted timely, unqualified accounts for the previous two financial years** - Cumulatively, 5 percent of total annual income (subject to a maximum of £250,000) in any financial year per category

The trust holds a separate Debt Recovery Policy. Discretion limits for Headteachers can be found at appendix 3b.

21. Special payments

For the purpose of this policy, special payments include:

- Staff severance payments, compensation payments and ex gratia payments.

Where the trust considers making a staff severance payment above statutory or contractual entitlements, the following factors will be considered prior to making the commitment:

- The proposed payment is in the interest of the trust
- The payment is justified, based on legal assessment of the chances the trust will successfully defend the case at employment tribunal
- The level of settlement is less than the legal assessment of what the relevant body will award

Under no circumstances will the trust make severance payments where the money could be interpreted as a reward for insubordination or failure.

Where the trust is considering a severance payment equal to or greater than £50,000, the trust will seek prior approval from the ESFA. The ESFA will refer the transaction to HM Treasury so the trust will allow sufficient time for this to be considered. Value for money will be shown for all severance payments.

The trust will also obtain prior approval from the ESFA before making a special staff severance payment where:

- An exit package which includes a special severance payment is at, or above, £100,000.
- The employee earns over £150,000.

Compensation payments will take account of the facts of the matter ensuring value for money is achieved. For compensation equal to or greater than £50,000, prior approval from the ESFA will be sought.

The trust will consider whether cases reveal concerns pertaining to the effectiveness of internal control.

Ex gratia payments will always be referred to the ESFA for approval.

22. Notices to improve

Where the ESFA has concerns about the trust's financial management and/or governance, and has issued a Notice to Improve (NtI), the trust will comply with this notice.

The ESFA will notify the trust of the date of which it published the Ntl.

The trust will publish any Ntl issued by the ESFA on its website within 14 days of it being issued, and retain this on the website until it is lifted by the ESFA. If a Ntl is issued, the trust will seek prior approval from the ESFA for all transactions outlined in [section 19](#) specifically:

- Special staff severance payments.
- Compensation payments.
- Writing off debts and losses.
- Entering into guarantees, indemnities or letters of comfort.
- Disposals of fixed assets beyond any limit in the funding agreement.
- Taking up a leasehold or tenancy agreement on land or buildings of a duration beyond any limit in the funding agreement.
- Carrying forward of unspent general annual grant (GAG) from one year to the next beyond any limit in the funding agreement.
- Pooling of GAG.

Where required, the trust will seek prior approval from the ESFA before entering into transactions with related parties. The trust will submit additional information, such as monthly income and expenditure accounts, if required by the ESFA.

23. Whistleblowing and fraud

The trust puts proportionate controls in place to mitigate the risks of fraud, theft and irregularity, e.g., regular inspections addressing risks.

Where instances of fraud, theft or irregularity are suspected or identified the board of trustees will investigate it promptly and should any evidence of fraud be found, they will take appropriate action.

In any instance of fraud, theft or irregularity whereby the amount defrauded comes to a total exceeding £5,000 in a financial year, the board of trustees will report it to the ESFA as soon as they become aware of it.

The trust's Whistleblowing Policy outlines the procedures to follow in the event of a report being made by a member of staff, as well as the appeals process and what can be done in the event of a whistleblower being treated unfairly.

The headteacher will ensure all their staff are aware of the Whistleblowing Policy, ensuring that they understand the process of reporting a concern and what they can expect once they have brought a concern to the attention of the academy.

The trust's Whistleblowing Policy is published on the trust's website.

24. Cyber-crime

The trust is aware of the risk of cyber-crime and will implement its Cyber-security Policy and Cyber Response and Recovery Plan across the trust.

Proportionate controls will be put in place to manage risks and appropriate action will be taken where a cyber-security incident has occurred.

The trust will obtain permission from the ESFA to pay any cyber-ransom demands and understands that the ESFA supports the National Crime Agency's recommendation not to encourage, endorse or condone the payment of ransom demands.

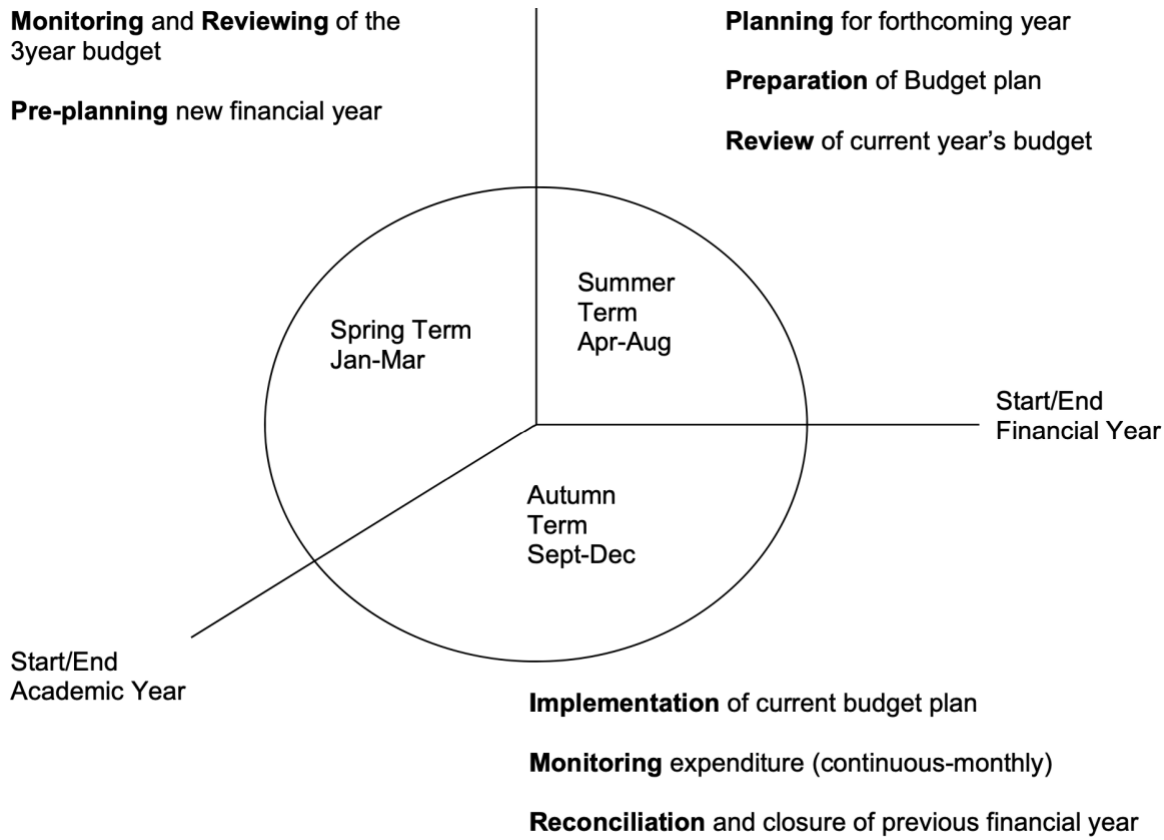
Appendix 1

Financial Cycle

September	<ul style="list-style-type: none"> Academy Trust Handbook comes into effect for start of new financial year (1st September). AO Supports trustees in preparation of trustees report. Deadline for submission by Auditor for Audited End of Year Certificate for Teachers' Pension. Academies must submit their public sector apprenticeship target data returns for the period 1 April - 31 March by 30 September. ESFA publishes guidance and workbook for the land and buildings collection tool. ESFA publishes key findings following the assurance work relating to academy trust financial statements, academy funding audits and financial management and governance reviews, for the previous year.
October	<ul style="list-style-type: none"> Census return (used for the basis in calculating next year GAG) Appointed Auditors start their preparative work on the Annual Accounts Accounts return online form available Second quarterly pupil premium for financial year.
November/December	<ul style="list-style-type: none"> Appointed Auditors present accounts for approval of Financial Statements by Directors. First PE and sport premium payment for the academic year
December	<ul style="list-style-type: none"> Trusts submit their audited financial statements, auditor's management letter, annual summary internal scrutiny report and accounts submission coversheet by 31 December.
January	<ul style="list-style-type: none"> Auditor submits Accounts Return based on statutory accounts by required ESFA deadline. Deadline for publishing statutory accounts on trust website by 31st January. Complete spring school census. Schools resource management self-assessment tool (SRMSAT) online form available.
February	<ul style="list-style-type: none"> Commence work on following year budget, priorities and potential staffing requirements Trust commences receiving GAG statements for following year funding from ESFA
March	<ul style="list-style-type: none"> Trusts complete and submit the school resource management self-assessment tool (SRMSAT). Commence construction of next year's budget. ESFA publishes the Academies Accounts Direction, Model Accounts and Auditor Guide for next financial year.
April	<ul style="list-style-type: none"> ESFA publishes guidance and workbook for the budget forecast return. Final quarterly pupil premium for the current financial year.
May	<ul style="list-style-type: none"> Trust submission deadline for the End of Year Certificate for the TPS Audited annual account must be submitted to Companies House by 31 May Complete summer school census. Final PE and sport premium for the current academic year.
June	<ul style="list-style-type: none"> Directors approve final budget for the following year. Budget forecast return form available. ESFA publishes the new financial year Academy Trust Handbook.
July	<ul style="list-style-type: none"> TA prepares BFR return to ESFA, approved by trustees and signed by AO and returned by CFO to the EFA. Final payment for universal infant free school meals for the current academic year Quarter 1 payment of pupil premium.
August	<ul style="list-style-type: none"> Financial Year End (31st August)

Appendix 2

Budgeting Cycle



Appendix 3a

Authorising orders for goods and services and contracts

Position	Name	Limit/Restriction
Headteacher of Academy* **	Bursley CCSC Chesterton Crackley Churchfields	£0 - £1,000 Evidence for VFM to be attached if quotes sought
Headteacher of Academy*	Bursley CCSC Chesterton Crackley Churchfields	£1,001 - £2,500 Evidence for VFM to be attached if quotes sought and approval from CEO/DCEO/CFO. Internet price checking is acceptable if evidenced.
Headteacher of Academy*	Bursley CCSC Chesterton Crackley Churchfields	£2,501 - £5,000 At least two written quotes should be obtained and attached to order, evidence of VFM sought and approval from CEO/DCEO/CFO. Internet price checking is acceptable if evidenced.
Headteacher of Academy*	Bursley CCSC Chesterton Crackley Churchfields	£5,001 - £19,999 At least three written quotes should be obtained unless item is from a single supplier and attached to order, evidence of VFM sought and discussed with CEO/DCEO/CFO. Internet price checking is acceptable if evidenced.
Headteacher of Academy*	Bursley CCSC Chesterton Crackley Churchfields	£20,000 - £35,000 These will be subject to short tender process. As we have an SLA with Entrust for property Management and consultancy, gas, electricity and water. Walsall Council for insurance we will use their schedule of rates for works and services over £20,000. Crown Commercial Service, Crescent Purchasing Consortium, Education Buying, YPO and Zenergi are all public sector compliant purchasing procurement platforms with commercial agreements that can be accessed in several ways: frameworks, catalogues, portals and aggregation (bulk buying). These will be used to help in purchasing for both short tendering process and Full Tender process.
Headteacher of Academy*	Bursley CCSC Chesterton Crackley Churchfields	£35,001 + These will be subject to full tender. As we have an SLA with Entrust for Property Management and consultancy, we will use their Schedule of rates for works over £10,000.

*Deputy Headteacher of Academy may authorise in absence of Headteacher of Academy

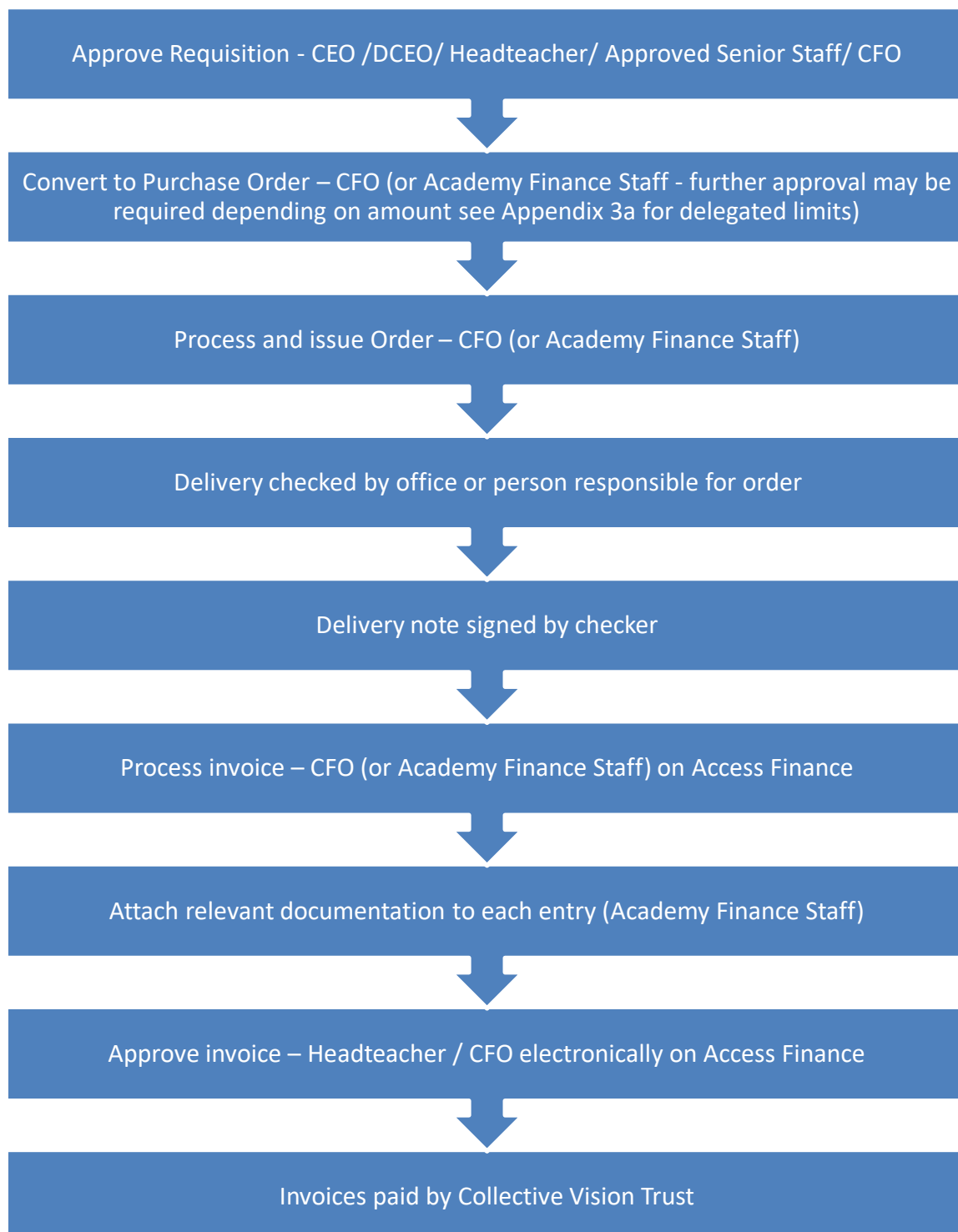
** Appropriate senior member of staff has authority up to limit specified

Appendix 3b **Debt recovery discretions**

Headteacher of Academy*	Bursley CCSC Chesterton Crackley Churchfields	Headteachers have the discretion to waive or partially waive debts up to £250.
Headteacher of Academy*	Bursley CCSC Chesterton Crackley Churchfields	Headteachers must refer outstanding debts £250+ to CEO/DCEO. Debts that reach £1000+ must also be referred to Finance and Audit Committee.

Appendix 4

Payments Work Flow



Appendix 5

Seven Principles of Public Life

Members of the Directors' Board and the Academy's Local Governing Board (the LGB) will manage their affairs in accordance with the high standards detailed in "Guidance on Codes of Practice for Board Members of Public Bodies" and in line with the seven principles of public life:

- **Selflessness**
Holders of public office should take decisions solely in terms of the public interest.
- **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 their 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 merits.
- **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 decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interests clearly demand.
- **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 interests.
- **Leadership**
Holders of public office should promote and support these principles by leadership and example.