

# The Co-operative Academies Trust Governance Arrangements

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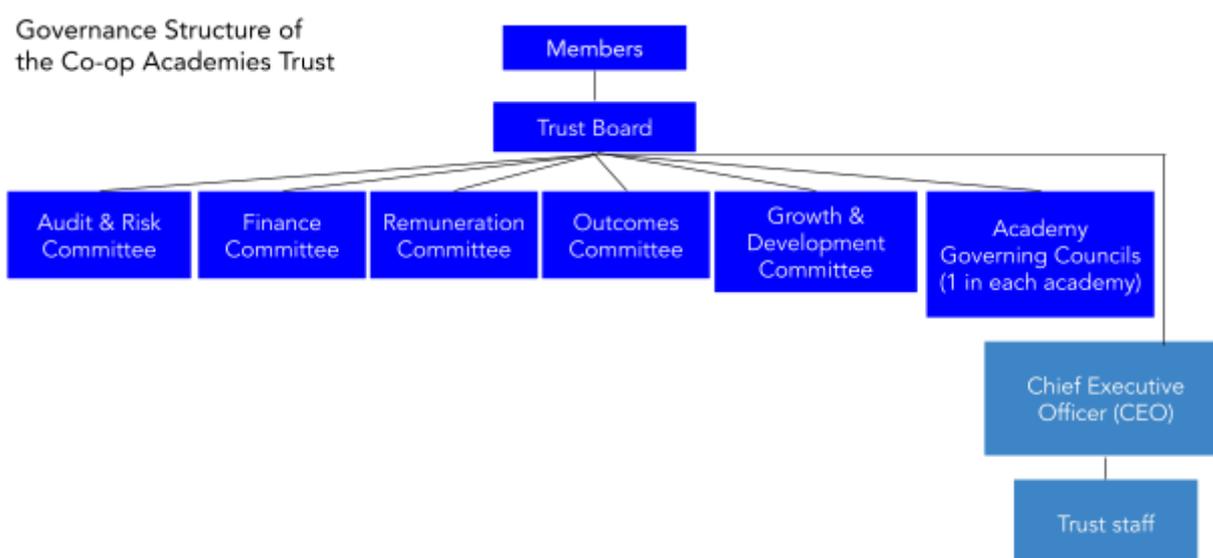
## Co-op Academies Trust Governance Arrangements

### 1. Introduction

1.1 Co-op Academies Trust was set up by the Co-op Group, following its initial sponsorship of two schools in 2010. By September 2021 it had grown to 26 academies and a sixth form college, with plans for further expansion. All references to 'academies' in this document include Connell Co-op College. The Trust exists to add social value. It does this through:

- working effectively in socially and economically challenging areas having an unflinching focus on academy improvement
- demonstrating a full commitment to co-operative values and the Ways of Being Co-op
- improving leadership and management through support and challenge from experts in their field
- focusing on broad educational provision and outcomes but emphasising the central importance of reading, writing and numeracy proficiency, raising aspirations and having an optimistic outlook on life
- expecting academies to contribute strongly to their communities and society in general
- creating young ambassadors for co-operative values who can increasingly change society, including their community, for the better<sup>1</sup>

1.2 The governance structure of the Trust is shown in the diagram below. It reflects the legal structure of the Trust as both a company limited by guarantee (ie without shareholders), and an exempt charity (ie accountable to the Secretary of State for Education, rather than to the Charities Commission).



<sup>1</sup> Co-op Academies Trust Strategic Plan 2019-2022

- 1.3 As the Trust's sponsor, the Co-op Group appoints the Members of the Trust, and also the Chair of the Trust Board. The Members have a particular role to oversee and ensure the good governance of the Trust, but it is the Trust Board which is the legally responsible body for the effective running of the whole organisation, and the oversight of its finances. The individuals who serve on the Trust Board are both directors of the company and trustees of the charity. In the Co-op Academies Trust we refer to these individuals as 'trustees', so that we don't confuse them with the directors employed within the trust.
- 1.4 The Trust Board delegates responsibilities to committees and also to an academy governing council (AGC) within each academy. The terms of reference for each of the Trust Board's committees are published on the Trust's website at [go.coopacademies.co.uk/governance](http://go.coopacademies.co.uk/governance).
- 1.5 The Trust is committed to embedding the Co-op's values, and the Ways of Being Co-op, into all of its working practices and the way that its academies operate. These are:
- Self-help – we support learners, parents, carers and staff to help themselves
  - Self-responsibility – we encourage learners, parents, carers and staff to take responsibility for, and answer to their actions
  - Democracy – we give our learners, parents, carers and staff a say in the way we run our schools
  - Equality – we believe that the voice of each individual should be heard
  - Equity – we run our schools in a way that is fair and unbiased
  - Solidarity – we share interests and common purposes with our learners, parents, carers and staff, and with other schools in the communities we serve
- 1.6 The following ethical values are expected to be demonstrated in everything the Trust does:
- Openness – we believe in being open with colleagues in our schools and beyond, children and their families, sharing information and ideas to raise standards and life chances
  - Honesty – we act in a professional and respectful manner in our dealings with everyone
  - Social responsibility – we maximise our impact on the people in our communities while minimising our footprint on the world
  - Caring for Others – we treat everyone as we wish to be treated ourselves, understanding that children only have one childhood
- 1.7 And all colleagues are encouraged to live the Ways of Being Co-op:
- Succeed together – Co-operating is what makes us different; we're better and stronger when we work together.

- Be yourself, always – We bring our best self to the Trust/academy, so that we each contribute and respect others for doing the same. Of course, being yourself isn't about excusing poor behaviours that contradict our other Ways of Being Co-op.
- Do what matters most – What matters most is ensuring that our students achieve the best possible outcomes.
- Show you care – We care about our Trust, our colleagues, our students, their parents, our Co-op and communities, now and for the future.

1.8 The Trust is a single financial and legal entity, delivering education on multiple sites through its different academies and its college, and the Trust Board has the legal responsibility of ensuring the effective running of the entire organisation. However, one of the key principles applied by the Trust is to ensure that local decisions are made locally, where this is in the best interest of our academies, their pupils, and their communities.

1.9 Some systems are centralised to support the academies and the whole Trust to run effectively and efficiently, but our academies know their communities best, and many decisions have been delegated by the Trust Board to the AGCs. This document lays out the principles under which the Trust Board and AGCs operate, and the scheme of delegation under which decision-making takes place.

## 2. Governance Within the Co-op MAT

2.1 The Department for Education's (DfE) Governance Handbook identifies three core functions of education governance:

- Ensuring clarity of vision, ethos and strategic direction;
- Holding executive leaders [headteachers/principals and the Chief Executive Officer and central team colleagues] to account for the educational performance of the organisation and its pupils, and the effective and efficient performance management of staff; and
- Overseeing the financial performance of the organisation and making sure its money is well spent.

2.2 In the Co-op MAT these roles are shared between the Trust Board, the officers of the Trust's central team and the AGCs, but the ultimate responsibility for ensuring all of these roles are undertaken effectively within the Trust sits with the Trust Board.

2.3 Because multi-academy trusts are companies, many of the governance arrangements are determined by the Companies Act 2006. The Trust is also required to comply with its funding agreement with the Secretary of State for Education, and the articles of association, which are an annexe of that agreement.

The Trust's articles of association (or "articles") are available to download from the Trust's website at: [go.coopacademies.co.uk/governance](http://go.coopacademies.co.uk/governance).

2.4 This document and its appendices (which together form the Trust's "Scheme of Delegation") explain the ways in which the Trust Board fulfils its responsibilities for the leadership and management of the Trust, and the respective roles and responsibilities of the trustees, the CEO and the AGCs in ensuring the success of the Trust's academies. It expands on some of the relevant parts of the articles and also explains the Co-op Academies Trust's arrangements in those areas where the Trust has discretion, including which areas of work have been delegated to trust officers and to AGCs, and the detailed financial arrangements and delegations within the Trust.

### 3. The Role and Remit of the Co-op Academies Trust's Members

3.1 The National Governance Association (NGA) says that the Members of a Trust are "the guardians of the governance of the trust.". In a company limited by guarantee, in other words a not-for-profit company like an academy trust, Members take the place of shareholders. Their responsibilities are limited but very important. Details of the Trust's Members are published on the website at [go.coopacademies.co.uk/governance](http://go.coopacademies.co.uk/governance).

3.2 The Members fulfil their responsibilities by appointing the Trustees - and can also remove the Trustees if this ever proved necessary. The Members meet twice a year, and can make decisions between meetings by way of written resolutions. The details of how Members' meetings and decision-making processes are conducted is determined by the Companies Act 2006 and by the Trust's articles.

### 4. The Role and Remit of the Co-op Academies Trust Board

4.1 With the over-arching aim of providing the best possible education to all pupils at Co-op Academies and maximising their life chances, the Trust Board will:

- Provide strategic direction for the Trust, through the creation and monitoring of a strategic plan;
- Ensure financial viability and the best use of the Trust's funds to ensure it delivers its purpose;
- Ensure the Trust complies with the requirements of the Department for Education (DfE), Education and Skills Funding Agency (ESFA), and all relevant legislation;
- Hold to account the Trust's Chief Executive Officer (CEO) and Senior Leadership Team (SLT);
- Ensure co-operative values are embedded in the Co-op academy programme.

4.2 In performing its functions, the Trust Board will have regard to:

- The need to safeguard and promote the rights and welfare of children and young people;

- The requirements and expectations of the Co-op Group;
  - Co-operative values;
  - The need to operate with corporate social responsibility in the discharge of its statutory functions; and
  - Stakeholder feedback.
- 4.3 Trustees must comply at all times with the Code of Conduct (Appendix C). The Trust Board will operate according to the processes specified in the Trust's articles and in Appendix D.
- 4.4 A more detailed list of the Trust Board's responsibilities is included as Appendix A.
5. The Role and Remit of Academy Governing Councils (AGCs)
- 5.1 In multi-academy trusts, legal responsibilities are held centrally. This means that the Trust Board is the legal "governing body" for every Co-op academy. Co-op Academies Trust has chosen to set up AGCs, which are committees of the Trust Board, in each of its academies, because it believes that it is often better for decisions to be made locally.
- 5.2 The AGC doesn't have statutory responsibilities in the way that the governing body in a standalone local authority maintained school has, but it has responsibilities delegated to it by the Trust Board, as laid out in this scheme of delegation.
- 5.3 Members of the AGCs will be referred to as 'governors'. Governors must comply at all times with the Code of Conduct (Appendix C). The operating processes for the AGCs are laid out in Appendix E.
- 5.4 The AGCs will take responsibility for monitoring and ensuring a high quality student experience, which meets the needs of the local community. This will include:
- Ensuring the Co-op values and Ways of Being are embedded in the academy
  - Supporting academy development planning and oversee and monitor the academy development plan/quality improvement plan
  - Approving and monitoring the academy's budget and three year business plan
  - Being consulted and informed regarding the academy's curriculum provision and academic standards
  - Reviewing and approving capital projects, subject to Trust Board approval
  - Setting the academy's staffing structure, in line with approved budgets, and oversee/approve staff appointments other than that of the headteacher/principal
  - Setting academy level policy in relation to safeguarding children and young people in line with Trust and statutory requirements and monitoring its effectiveness

- Overseeing and monitoring staff and student wellbeing
- Monitoring and promoting positive student behaviour and attendance
- Overseeing stakeholder engagement and ensuring stakeholder voices are heard in Trust decision-making
- Overseeing community engagement and ensuring that the academy supports the Co-op's community strategy
- Monitoring the academy's provision for vulnerable and disadvantaged children and young people, for example pupils with SEND, pupils qualifying for the pupil premium
- Setting the academies' admissions policy
- Monitoring academy risk register and business continuity plan
- Having responsibility for the maintenance of the academy's buildings and premises
- Supporting and monitoring the implementation of the Trust's and academy's health and safety policies
- Ensuring Trust-wide policies are adopted and followed in the academies

These delegated powers are set out in more detail in Appendix F below.

## 6. Delegation of Powers: General Provisions

- 6.1 The Trust Board delegates the powers and responsibilities outlined in Appendix F to the Trust's central team, via the CEO, and to the academies' AGCs and headteachers/principals. It is the Trust Board's role to set the strategy and policy and procedures of the academies, to ensure financial stability and effective school improvement, and to consider and respond to strategic issues. The academy is responsible for implementing the strategy, policy and procedures determined by the Board.
- 6.2 Specifically, this includes the academies being allowed to:
- expend Trust funds in line with this scheme of delegation
  - enter into contracts on behalf of the Trust (subject to approval by the Chief Operations Officer).
- 6.3 The AGC must consider any advice given by the headteacher/principal and follow advice, instruction and/or direction given by the Trust Board.
- 6.4 Any bank account in which any money of the Trust is deposited must be opened by the Trust, and operated by the academy in the name of the Trust. Signatories for bank accounts will be established on mandates signed by trustees.
- 6.5 The AGC will report to the Board on its exercise of its delegated functions on a regular basis.

## 7. Delegation of Powers: Finance

7.1 The detailed arrangements for financial delegation are outlined in Appendix B.

## 8. Delegation of Powers: Premises

8.1 The maintenance of the academies' buildings and facilities is the responsibility of the AGCs, who must always consider the safety of the users of the buildings and the facilities, and the legal responsibilities of the Trust Board as owners of such buildings and facilities.

8.2 The AGC will work with the central team to develop an 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 AGC's responsibility to ensure the buildings and facilities are maintained to a good standard.

8.3 The responsibility for any disposals or acquisitions of land to be used by the academies will sit with the Trust Board. Insuring the land and buildings used by the academies will be the responsibility of the Trust Board who will recover the cost from the budget delegated to the AGC.

## 9. Delegation of Powers: Staffing

9.1 Following consultation with the AGC, the CEO will be responsible for appointing the headteacher/principal. The AGC will delegate such powers and functions as it considers to be required by the headteacher/principal for the internal organisation, management and control of the academy (including the implementation of all policies approved by the Trust Board and the AGC and for the direction of the teaching and curriculum at the academy).

9.2 The AGC will be responsible for the appointment and management of all other staff to be employed at the academy provided that it complies with relevant Trust policies and manages any claims and disputes with staff members. In usual circumstances this responsibility will be delegated to the headteacher/principal.

9.3 The AGC will be responsible for ensuring that effective performance management takes place in relation to all academy staff, other than the headteacher/principal, whose performance management will be the responsibility of the CEO, and will put in place procedures for the proper professional and personal development of staff.

## 10. Delegation of Powers: Curriculum and Standards

- 10.1 The Trust Board will be responsible for the setting and review of the principles of the curriculum. This will always be in line with the Trust Board's responsibility to set a broad and balanced curriculum.
- 10.2 The CEO, via the Chief Education Officer and Executive Principals, in consultation with the AGC, will be responsible for the setting and implementation of the curriculum with the headteacher/principal in line with the principles set by the Board.
- 10.3 The CEO, via the Chief Education Officer and Executive Principals, shall be responsible for the standards achieved by the academy/college's pupils, in consultation with the AGC, following any guidelines set by the Trust Board or CEO.
- 10.4 The AGC will be responsible for the setting and annual review of the academy's/college's admissions policy and arrangements.
- 10.5 The AGC will review and consult on the admissions arrangements in line with statutory timescales and in accordance with applicable local authority arrangements, subject to prior agreement with the Trust Board of the admissions policy and criteria to be consulted on. These arrangements and any new admissions policy and criteria must be agreed with the Board before being adopted for the academy.
- 10.6 Any decision to expand or reduce the capacity of the academy/college shall be that of the Trust Board which will have regard to the views of the AGC.
11. Delegation of Powers: Extended Schools and Business Activities
  - 11.1 All activities which would be described as part of the academy's "extended schools agenda", or any activities designed to generate business income, are the responsibility of the AGC, but must be undertaken in line with Trust policy.
- 12 Delegation of Powers: Safeguarding and Pupil Well-Being
  - 12.1 The AGC will be responsible for ensuring effective mechanisms are in place to safeguard pupils and to appropriately handle child protection concerns. This will include appointing a safeguarding link governor, and a properly trained designated safeguarding lead member of staff.
  - 12.2 The AGC will be responsible for promoting the physical and mental well-being of pupils.
- 13 Engagement with stakeholders and the wider community

13.1 The AGC will be responsible for ensuring stakeholder voices are heard and taken into account. This will include communicating key issues to the Trust Board so that they can be taken into account in trust-wide decision making.

## 12. Operational Matters

12.1 The AGC will conduct itself according to the operating principles in Appendix D, and will comply with the obligations set out in Appendix E.

12.2 The AGC will adopt and will comply with all policies of the Trust Board.

12.3 Trustees and all members of the AGCs have a duty to act independently and not as agents of those who may have appointed/elected them and will act with integrity, objectivity and honesty in the best interests of the Trust and the academy/college, and shall be open about decisions and be prepared to justify those decisions, other than in relation to specific issues which the Trust Board or the AGC has decided are confidential.

12.4 The AGC will review its policies and practices on a regular basis, giving consideration to recommendations made by the Trust Board 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.

12.5 The AGC shall provide such data and information regarding the business of the academy and the pupils attending the academy as the Trust Board requests.

12.6 The AGC must promptly implement any advice or recommendations made by the Trust Board in the event that intervention is either threatened or is carried out by the Secretary of State, and the Trust Board reserves the right to review or remove any power or responsibility conferred on the AGC under this Scheme of Delegation in such circumstances.

12.7 The Trust Board may deploy staff to work in other areas of the Trust than their current employment on tasks and activities which are commensurate with their skills and experience. This is intended to provide career and professional development opportunities for staff.

## 13. Review

13.1 This scheme of delegation will be effective from the date it was agreed by the Trust Board and will usually be reviewed on an annual basis, with a comprehensive review at least every three years.

13.2 The Trust Board will have discretion to review this scheme of delegation at any time and to alter any provisions of it.

13.3 In considering any material changes to this scheme of delegation or any framework on which it is based, the Trust Board will have regard to and take into account any views of the AGCs.

#### 14. Reservation of Powers

14.1 Matters reserved for the Trust Board Board under this scheme of delegation are specified in Appendix A.

14.2 The Trust Board also reserves the right to exercise directly functions and powers delegated to the AGCs under this scheme of delegation, in the event of one of the following circumstances occurring:

- the academy/college is judged to be “Inadequate” following an Ofsted inspection;
- the academy/college is advised that it “Requires Improvement” following an Ofsted inspection; or
- at the discretion of the Trust Board, the academy/college is deemed not to be acting in accordance with this scheme of delegation or is otherwise not acting in accordance with the ethos of the Trust.

## Appendix A: Matters Reserved to the Board

### Strategy and Management

- Establishing the vision and ethos of the Trust and ensuring its co-operative values and principles are embedded in all of the Trust's activities
- Setting the strategic priorities for the Trust
- Providing strategic direction to the Trust and its academies through the creation of a strategic plan
- Appointment of the Chief Executive Officer (CEO) and Trust senior leadership team (SLT)
- Holding the CEO and Trust SLT to account for delivering the strategic plan
- Overseeing the strategic growth of the Trust and approving free school applications and schools/academies/trusts joining the Trust
- Performance managing the CEO and determining the performance management policy for the Trust

### Governance

- Preparation and approval of this Scheme of Delegation, in consultation with the academies, and ensuring it is regularly reviewed
- Ensuring the Trust remains compliant with all regulatory requirements including the Trust Funding Agreements and the latest Academies Financial Handbook (including the obligation not to use Trust funds for the purchase of alcohol)
- Undertaking a regular review of its own performance and that of its committees and link trustees
- Establishing and appointing to board committees and link trustee roles
- Appointing the AGC chairs
- Setting up register of trustees' interests and ensuring these are published on the website and updated annually
- Setting the risk appetite and overseeing the management of risk across the Trust

### Finance and Capital

- Ensuring financial viability and the best use of the Trust's funds to ensure it delivers its purpose
- Strategic and financial planning for the Trust and the academies
- Approval of three year and financial budgets for the Trust
- Approval of each academy's annual funding in consultation with the AGCs
- Cost allocation between the Trust and the academies
- Compliance with the Academies Financial Handbook
- Compliance with the financial and accounting requirements of the Trust
- Setting procedures for financial controls
- Approval on submission by the AGC of all proposed capital projects (for prior approval) before any costs incurred in relation to any project

- Approval of any changes to planned admissions numbers (PANs)
- Central procurement of insurance including buildings, land and trustees' and governors' insurance

#### Policies

- Setting the policy for pay and conditions using a robust evidence based approach;
- Establishing model policies on key issues - (where appropriate in consultation with AGCs and headteachers/principals) ;
- Approving procurement policies for the Trust
- Appointment and dismissal procedures
- Determination and review of disciplinary and capability procedures
- Determination of Early Retirement policy
- Determination of Trust pupil discipline principles statement
- Approval of academies' admissions policy in consultation with the AGC
- Establishing health and safety policy

#### Curriculum

- Approval of Trust Curriculum Statement
- Setting targets for Trust outcomes and holding the CEO and Trust SLT to account for these

#### Human Resources

- Determination of Early Retirement requests (where there is a cost to the organisation)
- Approval of pension discretions within the local government pension scheme (LGPS)
- Approval of any change in staff numbers beyond those budgeted for in the approved budget of the Academy
- Determination of terms and conditions of all staff

#### Communication

- communicating with the Department for Education and Education and Skills Funding Agency on key issues
- communicating and consulting with the Academies, including the AGCs on key issues;
- Devising Trust branding and branding guidance in agreement with the sponsor

# **The Co-operative Academies Trust**

## **Financial Regulations Manual**

September 2020

## 1. Introduction

- 1.1. This document sets out for The Co-op Academies Trust (“the Trust”) the Financial Regulations (“the Regs”), including the Scheme of Financial Delegation (“the Scheme”). Reference to the Trust includes its member organisations for the purpose of the authorities and procedures contained herein, except where otherwise stated.
- 1.2. The purpose of this Policy manual is to ensure that the Trust 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 of Education (DfE).
- 1.3. Trust must comply with the principles of financial control outlined in the Academies guidance published by the DfE. This manual expands on that and provides detailed information on the Trust’s accounting procedures.

## 2. Responsibilities

- 2.1. The Trust has defined the responsibilities of each person involved in the administration of the Trust finances to avoid duplication or omission of functions and to provide a framework of accountability for Governors and staff.
- 2.2. The Regs also contain the Financial Policies that the Board has adopted and provides the framework for how the Regs (including the Scheme) will be exercised.
- 2.3. The Regs provide an overview of the parameters that Board have set out to assist staff, Board, Governors and Academy Sub-Committee members to ensure that:
  - A financial framework exists within which staff, Board, Governor’s and committee members may properly act and are fully accountable for their actions;
  - The Scheme of Financial Delegation details the financial limits on commitments and payments that should be applied within the Regs and describes the associated permissions and responsibilities related to disbursing the Trust’s financial business and specifies the limits and ranges of delegation given with the Trust;
  - It complies with the rules and objectives of the Trust together with any other statutory requirements, is lawful, reasonable and represents value for money; and
  - The assets and other financial interests of the Trust are properly protected.
- 2.4. The Regs define the delegated financial authority levels for the Trust Board, Governors, Committee Members, CEO, leadership team and staff by detailing the policy by which staff can commit and authorise expenditure within an approved budgeted framework.
- 2.5. Board, Committees, AGC’s and staff are required to conform to the rules set out in these Financial Regulations. Any breach of these rules, whether inadvertent or otherwise, must be brought to the attention of the Chief Operations Officer (COO) who will investigate the circumstances with the personnel concerned. The COO will, in consultation with the CEO, decide whether the circumstances are such that they should be reported to the Trust Board. It is the responsibility of senior management to ensure their staff are made aware of the contents of these Financial Regulations, which form part of the overall regulatory framework and ensure that any local policies and procedures are consistent within this document.
- 2.6. All delegated limits should be considered to be exclusive of VAT.

2.7. The Chief Executive Officer (CEO) may from time to time make a direction in respect of a delegated officer that the authority of the person(s) specified in that direction to act as delegated officer for the purposes of the Scheme shall be:

- a) suspended;
- b) reduced;
- c) subject to conditions; and / or
- d) exercisable by another person (being an employee(s) of the Trust of the same or greater seniority).

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

#### **The Trust Board**

2.9. The Trust Board delegates the operational running, scrutiny and oversight of the Academies to the Academy Governing Councils (AGC's) but will monitor the performance and compliance of all Academies within the Trust. The main financial responsibilities include:

- monitoring quarterly expenditure including all additional school funds and any debt collection;
- reporting and reviewing expenditure including all non-general academy grant funding and any debt collection;
- ensuring financial viability and the best use of the Trust's funds to ensure it delivers its purpose;
- establishing an independent Audit and Risk Committee and Finance Committee for the Trust;
- setting the policy for pay and conditions using a robust evidence based approach;
- ensuring the Trust remains compliant with all regulatory requirements including the Trust Funding Agreements and the latest Academies Financial Handbook (including the obligation not to use Trust funds for the purchase of alcohol);

#### **The Academy Governing Council (AGC)**

2.10. The AGC has overall responsibility for the administration of the individual Academies finances. The main responsibilities of the AGC are prescribed in the Funding Agreement between the academy and the DfE and in the Trust's Scheme of Delegation. The main financial responsibilities include:

- ensuring that grants from the ESFA are used only for the purposes intended;
- ensuring that funds from sponsors are received according to the Academies funding agreement, and are used only for the purposes intended;
- recommend the annual budget for the approval by the Trust Board;
- monitoring quarterly expenditure including all additional school funds and any debt collection;
- In conjunction with the CEo, fund revenue expenditure-unbudgeted, funded by virements up to £40,000 in total;
- approval of capital expenditure schemes, subject to it being previously approved by Board as part of the business planning process or Trust Re-forecast, upto a maximum of £50,000. For schemes in excess of £50,000 it will require approval of the CEo and be in compliance with the Trust's Reserves Policy; and
- authorising the awarding of contracts over £10,000 (The Trust SLT to also approve contracts in excess of £25,000 and the CEO above £50,000).

#### **Trust Board Committees**

2.11. The Audit and Risk Committee is an independent Committee of the Trust Board, which advises

both the CEO, in their role as Accounting Officer, and the Trust Board. Its terms of reference can be found on the trust website at [go.coopacademies.co.uk/governance](http://go.coopacademies.co.uk/governance).

### **The Finance Committee (Trust )**

- 2.12. The Finance Committee is an independent Committee of the Trust Board, which advises both the CEO, in their role as Accounting Officer, and the Trust Board. Its terms of reference can be found on the trust website at [go.coopacademies.co.uk/governance](http://go.coopacademies.co.uk/governance)

### **Finance and Operations Committee - Academy Level (Where applicable)**

- 2.13. Where AGCs continue to operate a Finance and Operations (or similarly titled) Committee it will meet at least once a term, usually immediately prior to the second full AGC meeting, but more frequent meetings can be arranged if necessary. The main responsibilities of the Finance and Operations Committee are detailed in written terms of reference which have been authorised by the AGC. The main responsibilities include:

- the initial review of the annual budget; and
- the regular monitoring of actual expenditure and income against budget, including all additional school funds.

Where there is no Finance and Operations Committee, these responsibilities will be fulfilled by the full AGC.

### **Accounting Officer / Director of the Trust / Chief Executive Officer**

- 2.14. The CEO is the Accounting Officer. The full scope of responsibilities for the Accounting Officer is defined in the Academies Financial Handbook and includes a personal responsibility to Parliament, and to the EFSA's accounting officer, for the financial resources under the Trust's control. Accounting Officers must be able to assure Parliament, and the public, of high standards of probity in the management of public funds, particularly:

- **value for money** – this is about achieving the best possible educational outcomes through the economic, efficient and effective use of resources. A key objective is to achieve value for money not only for the trust but for taxpayers generally;
- **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 the trust's internal procedures – this includes spending public money for the purposes intended by Parliament; and
- **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.

### **Chief Education Officer (CEdO)**

- 2.15. The regional CEdO of the Trust works within the frame of responsibilities delegated by the CEO. The CEdO works in close collaboration with the CEO and the Trust's SLT. The main responsibilities of the CEdO are:

- approving new staff appointments (at a Hub or Academy level) within the authorised establishment, except for any senior staff posts which the Board/ CEO have agreed and should be approved by them;
- authorising contracts upto £50,000 in conjunction with SLT;
- In conjunction with the AGC, fund revenue expenditure-unbudgeted, funded by virements upto £40,000 in total;
- ensuring regional academies sets the budget for the financial year;
- ensuring regional academies sets three year budget plan;

- reporting regional financial performance to the CEO and COO including all additional school funds; and
- approving invoices and orders that have been ordered/ procured in line with the Trust's procurement guidelines (section 14 of these Regs).

### **The Principal / Headteacher/ Head of School (P/HdT/HdoS)**

2.16. Within the framework of the academy development plan as approved by the individual AGC the P/HdT/HdoS has overall executive responsibility for the academy's activities including financial activities. Much of the financial responsibility has been delegated to the Academy Finance Lead but the P/HdT/HdoS still retains responsibility for:

- approving new staff appointments within the authorised establishment, except for any senior staff posts which the AGC/ CEEdO have agreed should be approved by them;
- authorising contracts between £5,000 and £10,000 in conjunction with the Academy Finance Lead;
- fund revenue expenditure-unbudgeted, funded by virements upto £20,000 in total;
- authorising BACS in conjunction with the Academy Finance Lead or other authorised signatory;
- ensuring the academy sets the budget for the financial year;
- ensuring the academy sets three year budget plan;
- reporting financial performance to the AGC including all additional school funds; and
- approving invoices and orders upto £30,000 that have been ordered/ procured in line with the Trust's procurement guidelines (section 14 of these Regs).

### **Chief Operating Officer (COO)**

2.17. The Trust COO works in close collaboration with the CEO and the Academy Finance Lead. The Trust COO also has direct access to the trustees via the Audit and Risk and Finance Committees. The main responsibilities of the COO are:

- the management of the Trust's financial position at a strategic and operational level within the framework for financial control determined by the Board;
- setting and agreeing the Financial Regulations with the Board;
- setting, reviewing and updating the Trust's financial policies - for Board approval;
- the maintenance of effective systems of internal control;
- ensuring compliance with accounting policies and procedures, approved by the Board, in line with recommended best practice for companies and Charitable Trusts;
- ensuring that the consolidated annual accounts are properly presented and adequately supported by the underlying books and records of the academy;
- the preparation of the consolidated management accounts for the Trust;
- the preparation of the Trust's consolidated budget/ business plans over 1 and 3 years for Trust Board approval including the setting of key Trust-wide business plan assumptions and guidance;
- fund revenue expenditure-unbudgeted, funded by virements upto £40,000 in total;
- bad debt write-offs in accordance with the Academies Financial Academy Handbook;
- conduct of tenders for internal and external auditors for appointment by the Audit and Risk Committee;
- approving procedures for financial controls across academies;
- ensuring VAT returns are submitted as required by HMRC requirements;
- lead role with the Trust's pensions providers; and
- ensuring forms and returns are sent to the ESFA in line with the timetable in the ESFA guidance.

## **The Academy Finance Lead (AFL)**

2.18. The Academy Finance Lead (either the Academy Finance Manager, Regional Finance Director or shared Finance Manager) works in close collaboration with the P/HdT/HdoS through whom he or she is responsible to the governors. The AFL also has direct access to the governors via the Finance and Operations Committee. The main responsibilities of the AFL are:

- the day to day management of financial issues including the establishment and operation of a suitable accounting system to meet the requirement of the Trust;
- the management of the academy financial position at a strategic and operational level within the framework for financial control determined by the AGC;
- 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 academy;
- the preparation of monthly management accounts and financial reports for the Academy, Trust and Governors;
- preparation of quarterly VAT returns for submission to the Trust;
- authorising orders over £1,000 and up to £5,000 in conjunction with budget holders;
- authorising BACS in conjunction with the Principal/ Headteacher/ Head of School or other authorised signatory;
- ensuring relevant academy forms and returns are sent to the ESFA in line with the timetable in the ESFA guidance;
- to support the Trust COO.

## **Other Staff**

2.19. Other members of staff, primarily finance officers and budget holders, will have some financial responsibilities. 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's financial procedures.

## **Register of Interests**

2.20. It is important for anyone involved in spending public money to demonstrate that they do not benefit personally from the decisions they make. To avoid any misunderstanding that might arise all members of the Board, Governors and staff with significant financial or spending powers are required to declare any financial interests they have in companies or individuals from which the academy may purchase goods or services. The register is open to public inspection and will be requested by the auditors.

2.21. The register should include all business interests such as directorships, shareholdings or other appointments of influence within a business or organisation which may have dealings with the academy. The disclosures should also include business interests of relatives such as a parent or spouse or business partner where influence could be exerted over a Governor or a member of staff by that person.

2.22. The existence of a register of business interests does not, of course, detract from the duties of the Board, Governors and staff to declare interests whenever they are relevant to matters being discussed by the trust Board, AGC or a committee. Where an interest has been declared, the director, governor and staff should not attend that part of any committee or other meeting.

## **3. Areas of Specific Delegated Responsibilities**

3.1. There are a number of financial responsibilities that are delegated, by Board, to specific members of staff – these are outside the authorities in sections 6-17 of these Regs. The delegated authority for the following transactions lies with nominated Trust Directors or Principal / Headteachers or functions detailed in 3.3 below.

- 3.2. Prior to the authorisation of the following transactions and in making all commitments and anticipating payments, the delegated officers must consult with the CEO or the COO to ensure that sufficient funds are available and that cash flow impact is considered.
- 3.3. Sponsorship expenditure is generally prohibited as part of these Regs however, it is allowable where appropriate, approved by the relevant AGC and Board and incorporated into academy business plans.

<b>Specific Delegated Responsibilities – Within overall Trust approved budget</b>	
<b>Description</b>	<b>Delegated Authority</b>
Budgeted staff appointments and approval of salary changes (Excluding SLT)	Trust : Trust SLT Academies: Principal / Headteacher except for senior SLT positions which should be approved by the AGC in conjunction with the CEEdO
Appointment and approval of salary for Principal / Headteacher	CEO in conjunction with the CEEdO
Appointment and approval of salary for Trust SLT (Including terms and conditions)	Audit and Risk / Remunerations Committee
Board Member expenses	CEO or COO
Treasury management functions : purchase ledger payments, BACS / CHAPS transfers including inter Trust transfers – validation and release	See Appendix F and as per approved bank mandate
VAT settlement / reclaim validation and release	COO or delegated member of finance team
Contracts, lease agreements, grant claims/ documentation or other similar regulatory forms	See Appendix F
Insurance Policy Tenders and appointment	Trust Board or delegated sub-committee
Trust Policies	Trust Board or delegated sub-committee
Write-offs within the approved scheme of delegation	CEO or nominated SLT Member
HMRC/ Pension payments (deductions made via payroll) – Validation and release	COO or delegated member of finance team
Investments / Bank deposits - Policy	Audit and Risk Committee
In year review / update of revenue expenditure limits (new posts or staffing changes)	Director of Trust in conjunction with the COO
Settlement agreements	See Section 8.11 and Appendix F

#### 4. **General Delegated Financial Authority**

- 4.1. These are different and separate from the formal signature(s) required on Trust or Academy banking documentation.
- 4.2. The Regs establish a final point of delegation relating to the commitment of expenditure and approval of payments. This should be complementary to the integrated financial system and the automated approval process for financial commitments. The Delegated Officer should be supported by a structure of management controls including adequate segregation of duties over the authorising, receiving and payment is required to ensure an adequate level of control.

- 4.3. Delegated Officers are those employed by the Trust either on a permanent, temporary and contract basis. The term does not include those individuals contracted under consultancy arrangements.
- 4.4. The Delegated Officer takes personal responsibility for confirming that the financial commitment is valid, checked, coded correctly and authorised as being a valid charge against the Trust and in accordance with its policies and procedures.
- 4.5. Delegated Officers must assure themselves that an audit trail and adequate records support each transaction and that decisions are consistent with budget, law, regulations and Trust policies.
- 4.6. Delegated Officers are the main source of scrutiny to ensure the propriety and regularity of the expenditure. They would be asked to account for any errors or abuse that is discovered during or subsequent to the payment process.
- 4.7. In applying these Regs for general business and routine expenditure items that are processed through the Trust's purchase order system and integrated finance system, it has embedded controls that prohibit financial commitment unless an appropriate level of authorisation has been granted.
- 4.8. This control is achieved through the use of user identification and passwords, which cross-refer to the system's list of authorisations. The principal control mechanism is at the commitment stage, which contractually binds the Trust to make payments after receipt of goods or services. In addition, there should be appropriate checking before payments are made. The authorisation will be implemented through the segregation of duties, controlled by password and user ordering, goods receipt and payment process. The detailed controls in the integrated finance system are controlled by reference tables and named authorised staff and financial expenditure levels.

## 5. **Absence of Delegated Individual**

- 5.1. In the absence of a member of staff to whom financial authority has been delegated, that authority shall be exercised by a member of staff superior in the line of authority to the officer concerned, within the same operational academy/department, unless temporary alternative arrangements have been approved by the CEO or COO.
- 5.2. If the CEO is absent or unavailable and has not delegated authority to another member of the leadership team the Board Chairperson will delegate authority temporarily to another nominee.
- 5.3. In the absence of the Chair, where financial authority has been delegated to him / her that authority shall be exercised by the Chair of the Trust Audit and Risk Committee. This should be approved by the Board for any continuous absence longer than four weeks.

## **Financial Regulations**

### 6. **Financial Systems**

- 6.1. All the financial transactions of the Trust will be recorded in the Trust's computerised financial information accounting system. This system is operated by the Finance Department at each individual Academies or Hub. The consolidated database is held on the servers hosted by the provider of the Trust's financial system.
- 6.2. Entry into Trust's computerised financial information accounting system, is password restricted and the Trust finance team is responsible for implementing a system which ensures that passwords are changed at least every 3 months.

### **Back-up Procedures**

- 6.3. The Trust COO is responsible for ensuring that there are effective backup procedures for the system.

### **Transaction Processing**

- 6.4. All journal entries will be documented on the appropriate journal form and authorised by the Academy Finance Lead prior to being input to the accounting system. Where the Academy Finance Lead is also responsible for posting journal, then a review of summary journal entries is carried out periodically by the Regional Finance Director. Bank transactions should be input by the Finance Department and the input should be checked, and signed to evidence this check, by the Academy Finance Lead. On a monthly basis the Principal/ Headteacher/ Head of School or nominated employee, will countersign/ review the journals (or journal summaries).

### **Transaction Reports**

- 6.5. The Academy Finance Lead will obtain and review system reports to ensure the completeness and accuracy of transactions posted to the accounting system. The report obtained and reviewed will include:
- the monthly audit trail reports;
  - reports for the payroll, purchase ledger and sales ledger; and
  - management accounts summarising expenditure and income against budget at budget holder level.

### **Financial Reconciliations**

- 6.6. The Finance Department within each Academy is responsible for ensuring the following reconciliations are performed each month, on a timely basis, and that any reconciling or balancing amounts are cleared:
- sales ledger control account;
  - purchase ledger control account;
  - payroll control account; and
  - all suspense accounts and bank balance per the nominal ledger to the bank statement.

- 6.7. Any unusual or long outstanding reconciling items must be brought to the attention of the Trust COO and/ or the Regional Finance Director. The Academy Finance Lead (or where required, the Regional Finance Director) will review and sign all reconciliations as evidence of the review.

## **7. Business Planning (Including Budgeting)**

### **Planning**

- 7.1. A systematic process of financial and operational planning will be undertaken on an annual cycle, culminating in the preparation of a 3 year Financial Plan for the Trust incorporating each individual Academies. The budget set for the next financial year will form the first year of the financial plan.
- 7.2. Business plans must be prepared in line with guidelines set by the COO, and will consist of an income and expenditure account, capital expenditure, student/ pupil projections, staff plans, cash flow and balance sheet projections in the specified format along with a detailed narrative, and key performance indicators.

In addition to the above, the Trust, incorporating each individual Academy, must include a section on 'Stress Testing' through the use of multivariate sensitivity analysis. This analysis is designed to

test the robustness of financial assumptions used in the business planning process and their associated impact on Academies viability and compliance with the Trust's reserves policy.

- 7.3. In order to ensure that all relevant risks are addressed by business plans, the business plan process will take account of the most recent Trust (and Academy) risk maps.
- 7.4. Individual Academy business plans will be signed off by the P/HdT/HdoS and Academy leadership team, considered by the relevant AGC and recommended to the Trust Board for approval, prior to the financial year end in line with the business plan guidelines/ timetable.
- 7.5. Business plans should be updated regularly throughout the year for any known material variations to the original budget (in the form of a re-forecast) and submitted to the Trust as part of the request for approval for a revised forecast where is deemed necessary.
- 7.6. Business plans should also be updated (in the form of a revised forecast) as follows:
- Before being used as a basis for the BFRO/ BFR (Budget Forecast Return Outturn/ Budget Forecast Return), if there are known changes to the approved budget;
  - To reflect any significant change in business circumstances;
  - Upon a significant change in key financial assumptions (pupil numbers or projections, inflation, interest rates, salary/ pension issues etc.) which will materially impact on overall finances; and
  - As required by the individual AGC, Trust Board or the COO.
- 7.7. Additional reports will be made to the AGC of each Academy and to the Trust Board on an interim basis should the adjustments made in respect of any of the items listed in 7.6 above result in a material variation (greater than 10%) to the business plan previously approved by the Trust Board.
- 7.8. When reaching the Board the business plans should be accompanied by recommendations on its acceptability and on its impact on overall finances.

### **Budget Preparation**

- 7.9. The COO in consultation with other Trust SLT colleagues and senior managers is responsible for the coordination and preparation of the Trust's consolidated annual business plan (including income and expenditure budgets, balance sheet, cash flow statements and including multivariate sensitivity analysis).
- 7.10. The Academy Finance Lead is responsible for preparing and obtaining approval for the annual business plan for the Academy (including income and expenditure budgets, balance sheet, cash flow statements and including multivariate sensitivity analysis for each member organisation). The business plan must be approved by the P/HdT/HdoS, Finance and Operations Committee (if established) and the AGC. The Trust COO is responsible for preparing and obtaining approval for the annual budget for the Trust and consolidating the budgets for all the individual Academies. The Trust budget must be approved by the Trust Board.
- 7.11. Business plans are to be prepared in a form recommended by the COO, agreed by the Trust Board and proposals contained within them are to be consistent with the Trust's strategic plans and business objectives objectives.
- 7.12. Each year, the AGC of each individual Academy will consider income and expenditure proposals for the following year and approve (for recommendation to the Trust Board) the budget for the following year. In approving the budget, the AGC will make reference to the aims and objectives of

the Academies business plan.

- 7.13. The Trust's senior Management team will consider the detail of the consolidated budget within the particular regard to the financial strategy, reserves policy and the 3-year Financial Plan, before recommending it to the Trust Board for approval.
- 7.14. A consolidated budget will be presented to the Trust Board for approval in advance of the new financial year (normally in July).
- 7.15. Once approved, the individual Academy and Trust (consolidated) budgets are to be used as the basis for authority to incur expenditure on individual budget headings up to the approved value and will form the basis on which comparisons to actual expenditure will be made, until it is revised.
- 7.16. The Trust's business plans are prepared as part of the development planning process. The development plan indicates how the academy's educational and other objectives are going to be achieved within the expected level of resources over the next three years.

### **Academy Development Plan**

- 7.17. The development plan is concerned with the future aims and objectives of the Academy and how they are to be achieved; that includes matching the Academies' objectives and targets to the resources expected to be available. Plans should be kept relatively simple and flexible. They are the "big picture" within which more detailed plans may be integrated.
- 7.18. The form and content of the development plan are matters for the Academy to decide but due regard should be given to the matters included within the guidance to Academies and any annual guidance issued by the ESFA and the Trust's COO.
- 7.19. The completed development plan will include detailed objectives for the coming Academic year and outline objectives for the following two years. The plan should also include the estimated resource costs, both capital and revenue, associated with each objective and success criterion against which achievement can be measured.
- 7.20. The approved budget must be submitted to the ESFA by 31 July each year and The Trust's COO is responsible for establishing a timetable which allows sufficient time for the approval process and ensures that the submission date is met.
- 7.21. The annual budget will reflect the best estimate of the resources available to the Academy for the forthcoming year and will detail how those resources are to be utilised. There should be a clear link between the development plan objectives and the budgeted utilisation of resources.
- 7.22. The budgetary planning process will incorporate the following elements:
- forecasts of the likely number of students to estimate the amount of ESFA grant receivable;
  - review of other income sources available to the academy to assess the likely level of receipts;
  - review of past performance against budgets to promote an understanding of the academy cost base;
  - integrated curriculum and financial planning including use of the School resource management self-assessment tool;
  - identification of potential value for money savings;
  - review of the main expenditure headings in light of the development plan objectives and the expected variations in cost e.g. pay increases, inflation and other anticipated changes; and
  - compliance with the Trust's Reserves Policy.

- 7.23. If Academy plans identify a shortfall (or deficit) in funding and this results in reserves falling below the trust's reserves policy then the Principal/ Headteache must, in conjunction with the CEO, prepare a mitigation plan that will be incorporated into the Academy plan that will bring the plan back in line with the Trust's reserves policy. The Academy must not submit a plan to the AGC (or Board) that does not comply with the Trust's policy without prior approval of the CEO of COO.

### **Balancing the Budget / mitigation Planning**

- 7.24. 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**

- 7.25. Once the different options and scenarios have been considered, a draft budget should be prepared by The Academy Finance Lead for approval by the Headteacher/ Principal, the Finance and Operations Committee (if established) and the AGC. The budget should be communicated to all staff with responsibility for budget headings so that everyone is aware of the overall budgetary position and any constraints.
- 7.26. The budget should be accompanied by a statement of assumptions. The budget should be seen as a working document which may need revising throughout the year as circumstances change, subject to the approval process outlined in this document.

## **8. Performance Management and Monitoring**

- 8.1. The COO is responsible for ensuring that adequate budgetary control mechanisms including a secure framework for budgetary delegation and effective variance reporting routines are in place across all areas of the Trust's business.
- 8.2. All budgets must identify a budget holder responsible for the financial control of that revenue or capital budget. Although the budget holder has overall authority, other officers may be approved to authorise expenditure within the budget, and it is the responsibility of the budget holder to ensure that the approved officers are fully aware of their authority levels and limits (as set out in the authority Schedule – Appendix A to these Financial Regulations). In particular, approved officers must be aware that no employee or member shall commit expenditure unless:
- The item of expenditure is within budget and has been approved by the relevant AGC and Board;
  - The individual concerned has authority to incur such expenditure;
  - Any other regulation (e.g. procurement procedures) concerning the type of expenditure involved has been complied with; and
  - To ensure value for money, goods and services should be purchased on the most advantageous terms in accordance with the Trust's procurement procedures.
- 8.3. Strict budgetary control will be maintained by managers for all income and expenditure they are responsible for.

- 8.4. Individual Directors and or Principal's/ Headteacher's will have overall responsibility for the income and expenditure of their Directorates or Academies.
- 8.5. The Academy Finance Lead (or nominated person) is responsible for the circulation to the Trust Directors, Principal/ Headteacher/ Head of School's and other senior managers of monthly statements of income and expenditure.
- 8.6. The Academy Finance Lead (or nominated person) is responsible for the analysis and reporting of variances and forecasts on a regular basis (no less frequently than quarterly) to the individual AGC on the financial position of each Academy. The Trust COO will consolidate these financial statements into a single Trust report for submission to the Trust Board, incorporating the appropriate variance analysis prepared/ presented by individual Academy Finance Lead. A review will accompany this information and will include explanations for any material variations together with recommendations from the CEO, where necessary, for corrective action to ensure that the projected out turn is achievable or acceptable. Such reports will be presented within an agreed period.
- 8.7. The budget may be reviewed from time to time during the year, following the same procedures as for the original budget, a revised budget (in the form of a re-forecast) may be approved which will be adopted in place of its predecessor.
- 8.8. Any new proposal to the Board, which would involve the incurring of additional net expenditure during a period for which the Board has already approved a budget or a programme of capital expenditure, shall be accompanied by a business case report indicating the level of adequacy or otherwise of the financial provision in the budget and programme.
- 8.9. Forecast 'Outturns' (Re-forecasts) are to be prepared by each individual Academy, in the format set out in the Trust's procedure, on a quarterly basis and reported to the relevant Academy Finance Lead (or nominated staff member), for incorporation into financial reports before presentation to the Trust Board. Re-forecasts that cause an Academy to be materially over budget are subject to approval of the appropriate Senior Management Team, AGC and / or Trust Board, in accordance with the following:

Budget (or Forecast) Overspend (per budget line)	Approval From
Up to £5,000 in total	Principal; Headteacher; Head of School
£5,001 to £10,000	AGC or CEdO
£10,001 to £50,000	CEO/ SLT
£50,001+	CEO/ Trust Board

- 8.10. Approvals required for new, unbudgeted expenditure (i.e. not specifically included in approved budget), including unbudgeted staff posts, are as follows:

Unbudgeted Expenditure (per Item)	Approval From
Up to £5,000 in total	Principal; Headteacher; Head of School
£5,001 to £10,000	AGC or CEdO
£10,001 to £50,000	CEO/ SLT

£50,001+	CEO/ Trust Board
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8.11. Approvals required for unbudgeted settlement agreements are as follows:

Unbudgeted Settlement Agreements	Approval From
Up to £5,000 in total	Approval from - AGC Report to - CEdo, Regional HR and Finance Director
£5,001 to £10,000 in total	Approval from - AGC, CEdO and CPO Report to - Regional Finance Director
£10,001 to £25,000 in total	Approval from - Above plus SLT
£25,001+ in total	Approval from - CEO Report to - Chair of Trust and Audit & Risk For amounts greater than £50,000 - Report to ESFA

8.12. Approvals required for other variations to the budget are as follows:

Budget Variation	Approval From
Impact of any new policies, or significant amendments to existing policies which have been previously been approved.	Trust Board
Virement of expenditure between budget headings upto £20,000 in total	Principal/;Headteacher
Virement of expenditure between budget headings upto £40,000 in total	AGC/ CEdO
Virement of expenditure between budget headings above £40,000	Trust SLT

8.13. AGC's may approve any financial proposals which alter the budgeted surplus for the year in accordance with the table in 8.10

8.14. The CEO, in conjunction with SLT may approve any action which incurs additional expenditure if specific additional income of at least equal value has become available.

8.15. The AGC and the Trust Board will also receive, during the financial year, any other reports or statements as it from time to time considers necessary to exercise proper financial control including, where appropriate, PFI performance reports.

8.16. Nothing in these Financial Regulations shall prevent an officer from incurring expenditure which is essential to meet any immediate needs of the Trust created by an emergency. This is subject to their action being discussed beforehand with the CEO, relevant Trust Director or Principal/ Headteacher, and being reported immediately to the subsequent Trust Board meeting.

8.17. Once approved the budget should be uploaded to the Trust's computerised financial information accounting system so that all budget-holders are aware of available funds.

8.18. Reports will be prepared as a minimum monthly by the Academy Finance Lead. The reports will detail actual income and expenditure against budget both for budget holders and at a summary

level for the Principal/ Headteacher and the Finance and Operations Committee. Reports will also include rolling 12 month cash flow and balance sheet projections.

- 8.19. Any potential overspend against the budget must in the first instance be discussed with the Academy Finance Lead. The accounting system will not allow payments to be made against an overspent budget without the approval of the Academy Finance Lead. If the potential overspend is above £50,000 in total then the Trust COO needs to be notified in advance.
- 8.20. 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 transfer uncommitted resources (virement) from one budget to another in line with the delegated approvals.

## 9. **External and Internal Auditing**

- 9.1. The Trust Board will appoint External Auditors as required by statute, and in a way consistent with the requirements of the current guidance issued by the ESFA.
- 9.2. The COO (or a nominated staff member) will arrange for the completion of the external audit, liaising with the external auditor on behalf of the Trust. The COO, Academy Finance Lead, or a nominated staff member are responsible for ensuring that draft Trust accounts are considered by the Trust Audit and Risk Committee before the Trust Board and that the finalised financial statements are available for adoption at the Board, which is held within four months of the year end.
- 9.3. The COO, Academy Finance Lead, or nominated staff member, will also arrange for the Management Letters (Audit Findings Report) to be considered by the Group Audit and Risk Committee.
- 9.4. The external auditors should be given the opportunity, at least once a year, to meet the Audit and Risk Committee without any officers being present, to discuss issues that may have arisen during their work, or highlight areas of concern.
- 9.5. The COO is responsible for ensuring there are adequate internal audit arrangements in place.
- 9.6. The internal audit function is carried out by the Board's appointed consultants, under the independent control and direction of the COO which shall be arranged to carry out a continuous examination of financial and other operations of all Academies within the Trust. An annual risk based programme of work will be set by the COO in consultation with Directors and the Audit and Risk Committee.
- 9.7. All internal audit reports are available to members of the Audit and Risk Committee. A summary of audit findings is presented to the Audit and Risk Committee each quarter.
- 9.8. Where an external Audit Management Letter (Audit Findings Report) or internal audit report highlights weaknesses or improvements, management will provide a response within the report. For external and internal audit, it is the responsibility of the COO to liaise with the appropriate staff to ensure that the response is provided. The response will include the following information:
- Whether the recommendation is accepted, and if not, why not;
  - Where not clear from the recommendation, details of what action is to be taken;
  - Who is responsible for completing the work required; and
  - A timescale for completing the work.

- 9.9. The External and Internal Auditors along with the CEO, or their authorised representative, shall have authority to:
- Enter at all reasonable times any of the Trust's premises or land;
  - Have access to all records, documents and correspondence relating to any financial or other transaction of the company;
  - Require and receive such explanations as are necessary concerning any matter under examination; and
  - Require any employee of the company to produce cash, stores or any other Trust's property under the employee's control.
10. **Business Assurance and Risk Management**
- 10.1. The Trust is committed to the highest standards of quality, probity, openness and accountability. As part of this commitment, the Trust encourages employees or others with serious concerns about any aspect of the Trust's work to come forward and express those concerns, without fear of reprisal or victimisation, in accordance with the Trust's HR guidelines and the Trust's Anti-Fraud and Anti Bribery Policy.
- 10.2. The Trust has a number of strategy and policy statements which outline its stance on anti-fraud and corruption and provide information and guidance on fraud and corruption related issues. The Anti-Fraud and Anti Bribery Policy brings together these statements in one place. The policies contained within the framework document are:
- Anti-Fraud and Corruption Strategy;
  - Fraud Response Plan;
  - Anti-Bribery Plan;
  - Whistleblowing Policy; and
  - Anti-Money Laundering Policy.
- 10.3. Whenever a matter arises that is thought or suspected to involve irregularities concerning cash, property or the exercise of the functions of the Trust or any Academy within the Trust, the member of staff who becomes aware of it should immediately notify their line manager. The issue should be reported immediately thereafter to Principal/ Headteacher/ Head of School or Director level and in all instances, this should be reported to the Trust Company Secretary, and they will decide whether the issue is serious enough to refer to the CEO.
- 10.4. If the suspected irregularities potentially involve the P/HdT/HdoS or Director, then the CEO should be notified.
- 10.5. The Director who becomes aware of the irregularity and other senior officers will then continue to act in accordance with agreed procedures as may be detailed in the Terms and Conditions of Employment. Having been notified of the potential irregularity, the CEO shall take further steps as they consider necessary by way of investigation, action and report to the Audit and Risk Committee and Trust Board.
- 10.6. If the suspected irregularities potentially involve the CEO then the Director who becomes aware of the potential irregularity should consult the Trust Chair or the Chair of the Audit and Risk Committee, who will take action they consider appropriate.
- 10.7. As per the ESFA Financial Handbook, there is a regulatory requirement to submit an annual report on net losses from fraudulent activity.

- 10.8. The Trust will ensure it complies with all financial regulations defined by the ESFA and Companies Act, and members and staff will cooperate in full with reviews by the ESFA including external and internal audits.

### **Insurance Management**

- 10.9. The COO or nominated staff member, shall affect all insurance cover and negotiate all claims either in consultation with, or by delegation to other offices where appropriate.
- 10.10. Other officers shall promptly notify the COO or nominated staff member, of all matters which might affect the Trust's insurance, including new risks, losses, possible claims for accident or damage, and will give such assistance as the Director may require formulating claims or dealing with matters arising.
- 10.11. When becoming aware of a potential claim through loss, liability or damage or other cause the member of staff involved will, as soon as is practically possible, notify the COO or nominated staff member, who will submit a claim to the Group's insurance brokers or direct to the insurer, following agreed procedures for such claims.
- 10.12. The COO or nominated staff member, shall annually or more regularly if appropriate review all insurance in consultation with other Trust SLT colleagues, and arrangements will be made to ensure the Trust's assets and activities are properly insured in accordance with good practice.
- 10.13. Directors and other staff shall consult the COO and, if felt appropriate, the Trust's solicitors regarding the terms of any indemnity which the Group is requested to give.
- 10.14. The COO will submit a report to the Board on cover for the Trust's risks on an annual budget basis, including an assessment as to whether insurance arrangements need to be changed.

### **Risk Management**

- 10.15. The Trust, through the Audit and Risk Committee, will maintain a comprehensive Risk Management Framework including:
- a risk management strategy, approved by the Board;
  - a risk register for the key risks facing the Trust;
  - an assessment of the likelihood of the risk crystallising and the potential impact;
  - proposals of risk mitigation; and
  - identification of risk owners.
- 10.16. Where new projects or initiatives, including property acquisitions and developments are proposed, the project appraisal will include an assessment of the appropriate risks involved.

### **Security**

- 10.17. Each Director or Principal/ Headteacher/ Head of School is responsible for maintaining proper security at all times for all buildings, stocks stores, furniture, equipment, cash etc. under their control. They shall consult with the Director responsible for resources on any issues where security is thought to be defective or where it is considered that special security arrangements may be needed.

- 10.18. Maximum limits for cash holdings shall be agreed by the COO or nominated staff member, and shall not be exceeded without express permission.
- 10.19. Keys to safes and other similar containers are to be carried on the person of those responsible at all times while in the office and safely stored when not in the office. The loss of any such keys must be reported to the relevant Director, Principal/ Headteacher/ Head of School and Academy Finance Lead as soon as possible. Duplicate keys will only be issued in exceptional circumstances on satisfaction that all reasonable efforts have been made to recover lost keys. No keys should be marked in such a way as to make them identifiable to any person who is not authorised to hold that key.
- 10.20. The COO or nominated staff member, shall be responsible for maintaining property security and privacy of information held in a computer installation and ensuring the information is not improperly disclosed. Further, information held on individuals should comply with the requirements of GDPR.
- 10.21. The Academy Principal/ Headteacher/ Head of School shall be responsible for ensuring that regular copies of Academy computer data are made and that these are stored in a safe, remote location, and that arrangements are in place for backup usage of computer facilities in the event of a serious malfunction.
- 10.22. Staff should ensure that their personal belongings are kept safe and secure at all times because the Trust cannot be responsible for losses.

## 11. **Treasury Management**

- 11.1. The Trust adopts key recommendations of the ESFA Good Practice Guide.
- 11.2. The Boards are responsible for the implementation and monitoring of its treasury management policies and practices, and delegates responsibility for the execution and administration of treasury management decisions to the COO, or nominated staff member, who will act in accordance with the Trust's policy statement and TMP's and the ESFA's Good Practice Guide to Treasury Management.)
- 11.3. Treasury systems and procedures will be developed by the COO to manage the key risks of cost, liquidity and maximisation of investment returns, whilst reducing risk to an acceptable level. These systems and procedures will be in line with the Trust's Investment Policy.

### **Bank Accounts**

- 11.4. The opening of all accounts must be authorised by the Trust Board. Any bank account in which any money of the Trust in so far as it relates to the Academy is deposited shall be operated by the AGC in the name of the Trust. Signatories for bank accounts will be established on mandates signed by Trust Directors.

### **Deposits**

- 11.5. 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**

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

- Principal/ Headteacher/ Head of School;
- Academy Finance Lead;
- Vice Principal/Deputy Headteacher;
- Trust COO; and
- Nominated Governors.

11.7. This provision applies to all accounts, public or private, operated by or on behalf of the AGC of the academy. Authorised signatories must not be the sole signatory of a cheque relating to goods or services for which they have also authorised the expenditure.

## **Administration**

11.8. The Academy Finance Lead 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 Academies ledger;
- reconciliations are prepared by the Finance Department;
- reconciliations are subject to an independent monthly review carried out by the Academy Finance Lead (where prepared by the AFL a review should be carried out regularly by the Regional Finance Director); and
- adjustments arising are dealt with promptly.

## **Petty Cash Accounts**

11.9. The academy maintains a maximum cash balance of £500. The cash is administered by the Finance Department and is kept in the office safe.

## **Petty Cash - Deposits**

11.10. The only deposits to petty cash should be from cheques cashed specifically for the purpose. The receipt should be recorded in the petty cash system with the date, amount and a reference, normally the cheque number, relating to the payment. All other cash receipts for whatever reason should be paid directly into the bank.

## **Petty Cash - Payments and Withdrawals**

11.11. In the interests of security, petty cash payments will be limited to £25. Higher value payments should be made by cheque directly from the main bank account as a cash book payment.

## **Petty Cash - Administration**

11.12. The Finance Department is responsible for entering all transactions into the petty cash records on a regular basis and regular as well as unannounced cash counts should be undertaken by the Finance Department to ensure that the cash balance reconciles to supporting documentation.

## **Petty Cash - Physical Security**

11.13. Petty cash should be held in a locking cash box which is put in the safe overnight.

#### **Credit Cards**

11.14. Credit card usage must adhere to the Trust's Credit Card Policy.

#### **Cash Flow Forecasts**

11.15. The Academy Finance Lead is responsible for ensuring that the academy has sufficient funds available to pay for day to day operations. The Trust COO has this responsibility for central Trust funds. Where there is the possibility of an Academy or the central trust having insufficient cash to meet its obligations, a rolling 12 months cash flow forecast must be maintained. In conjunction with the Trust COO the Academy Finance Lead will identify the need for cash support from elsewhere in the Trust. Plans should be made to transfer funds from another bank account or to re-profile income and expenditure to cover potential cash shortages. If significant positive balances can be foreseen, steps should be taken to invest the extra funds.

11.16. Cash Flow forecasts will be updated monthly in line with the Trust accounting timetable by the Academy Finance Lead and reported to the Trust COO.

#### **Investments**

11.17. Investments must be made only in accordance with the Policy and Procedures approved by the Trust Board.

11.18. All investments must be recorded in sufficient detail to identify the investment 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.

### **12. Corporation Tax and Value for Money (VAT)**

12.1. The COO, or nominated staff member, shall be responsible for ensuring that the Trust complies with the Corporation Tax and VAT legislation whilst at the same time endeavouring to minimise, so far as the law permits and so far as in the best interests of the Trust and its individual Academies, its liability to taxation.

12.2. The COO, or nominated staff member, shall be responsible for making all Corporation Tax and VAT returns on behalf of the Trust and for ensuring so far as is possible that penalties are not incurred.

### **13. Management of Assets**

13.1. The COO, and any other Directors, Principals/ Headteachers and senior managers are responsible for safeguarding the assets of the Trust and managing them in a manner consistent with maximising Trust value.

13.2. A register or registers of all properties owned or leased by the Trust will be kept in a form approved by the COO (in compliance with regulatory requirements) recording location, extent and plan reference, purchase details and particulars or nature of the Trust's interest and rents payable and particulars of tenancies granted.

- 13.3. All acquisition of assets must be in accordance with the Trust's procurement policy and procedures, the development scheme appraisal procedure, the system of delegated authority and the annual budget provision.
- 13.4. The COO, or nominated staff member, will make arrangements to ensure the safe custody of all title deeds.
- 13.5. A register of furniture, fittings, equipment, plant and machinery and other capital equipment owned or leased by the Trust will be maintained, in a format determined by the COO, or nominated staff member.
- 13.6. Assets capitalised in the balance sheet are to be depreciated in line with policies set by the Trust Board. The COO, or nominated staff member, will review the depreciation policies on an annual basis to ensure that they remain appropriate. An annual impairment review of all properties will be carried out and where appropriate will be written down to their residual value.

### **Disposal of Land and Property and Other Assets**

- 13.7. The disposal or write off of assets are approved only where they are in accordance with the Financial Procedures relating to assets. Any disposal of assets must be at the best sale value, in accordance with delegated authority.
- 13.8. All sales or disposals of land and property over the value of £25,000 will be authorised by the Trust Board and be include any regulatory approvals/consents.

### **Asset Register**

- 13.9. All items purchased with a value over the academies capitalisation limit of £1,000 must be entered in an asset register. The asset register should include the following information:
- asset description;
  - asset number;
  - serial number;
  - date of acquisition;
  - asset cost ;
  - source of funding ;
  - expected useful economic life ;
  - depreciation;
  - current book value ;
  - location; and
  - name of member of staff responsible for the asset.
- 13.10. 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; and
  - support insurance claims in the event of fire, theft, vandalism or other disasters.

## **Security of Assets**

- 13.11. Stores and equipment must be secured by means of physical and other security devices. Only authorised staff may access the stores.
- 13.12. 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 AGC. Inventories of academy property should be kept up to date and reviewed regularly. Where items are used by the academy but do not belong to it this should be noted.

## **Disposals**

- 13.13. Items which are to be disposed of by sale or destruction must be authorised for disposal by The Academy Finance Lead and, where significant, should be sold following competitive tender. The academy must seek the approval of the ESFA in writing if it proposes to dispose of any land, buildings or heritage.
- 13.14. 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.
- 13.15. All disposals of land must be agreed in advance with the Secretary of State.

## **Leases**

- 13.16. The Trust is not able to enter into finance leases. All proposed leases for the use of assets must be identified and confirmed as operating leases by the Academy Finance Lead.
- 13.17. Operating leases relating to land and buildings should be referred to the Trust COO who will establish if ESFA approval is required.

## **Loan of Assets**

- 13.18. Items of academy property must not be removed from academy premises without the authority of the Head of Department/ Principal or Headteacher in a primary academy. A record of the loan must be recorded in a loan book and booked back into academy when it is returned.
- 13.19. 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 Trust auditors.

## **14. Procurement**

- 14.1. The Trust wants to achieve the best value for money for all purchases. This means the correct quality, quantity to meet the timescale and at the best price possible. A large proportion of their 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 academy;
  - **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.

The Trust expects all its suppliers to have adopted an approach which is consistent with the provisions of the Modern Slavery Act 2015.

### **Routine Purchasing**

- 14.2. 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. Data detailing actual expenditure and committed expenditure (orders placed but not paid for) against budget will be supplied to each budget holder each month. Budget holders are also be able to look up data relating to their own budget areas via the online financial information system.
- 14.3. Routine purchases up to £2,000 can be ordered by budget holders. A quote or price must always be obtained before any order is placed. If the budget holder considers that better value for money can be obtained by ordering from a supplier not on the approved supplier list the reasons for this decision must be discussed and agreed with the Academy Finance Lead.
- 14.4. All orders must be made, or confirmed, in writing using an official order form, stocks of which are held in the Finance Department. Orders must bear the signature of the budget holder and must be forwarded to the Finance Department who will check to ensure adequate budgetary provision exists before placing the order, or checked via online budget information where available.
- 14.5. Approved orders/requisitions will be recorded in the purchase order module of the financial information system which allocates a reference number. Orders will be dispatched to the supplier from the Finance Department or electronically from the purchase ordering system.
- 14.6. The budget holder must make appropriate arrangements for the delivery of goods to the academy. On receipt the budget holder or other staff member 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.
- 14.7. If any goods are rejected or returned to the supplier because they are not as ordered or are of substandard quality, the Finance Department should be notified. The Finance Department will keep a central record of all goods returned to suppliers.
- 14.8. All invoices should be sent to the relevant academy Finance Department. Invoice receipts will be recorded by the Finance Department (and the invoice scanned) into the Financial Information System purchase ledger module) The Finance Department will evidence:
- invoice arithmetically correct;
  - invoice posted to purchase ledger;
  - goods/ services received;
  - goods/services as ordered;
  - prices correct;
  - invoice authorised for payment;
  - payment authorised; and
  - VAT treated correctly.
- 14.9. Points (a) and (b) will be completed by the Finance Department. The invoice will then be sent to the budget holder to agree (c), (d) (e) and (f). Before authorising these points the budget holder must make a detailed check against the order and the GRN. Budget holders must undertake these checks without undue delay and in any case within 7 days of invoice receipt. This is based on term time.

- 14.10. If a budget holder is pursuing a query with a supplier the Finance Department must be informed of the query and periodically kept up to date with progress.
- 14.11. When the budget holder has agreed (c), (d) (e) and (f) the invoice should be sent to the Finance Department. On a monthly basis the Finance Department will produce a list of outstanding invoices from the purchase ledger.
- 14.12. The Finance Department will then input details of payments to be made to the purchase ledger and generate the BACS list. The BACS and associated paperwork must be authorised by two of the nominated signatories. There may be occasions when suppliers will be paid by cheque and will be signed by two of the nominated signatories.

### **Suppliers' bank details**

- 14.13. All changes to suppliers' bank details must be validated by the Academy Finance Lead. Academy finance staff should obtain authorisation from the Academy Finance Lead prior to making any such changes and the change should be validated by contacting the supplier by reference to contact information held on file. All changes should follow the Trust's procedures for changes to supplier details including bank details.

### **Orders over £2,000 but less than £5,000**

- 14.14. At least three verbal quotations or estimates must be obtained and the process recorded on the accounting system together with the name of the budget holder who has made the procurement decision.

### **Orders over £5,000 but less than £25,000**

- 14.15. At least three written quotations must be obtained for all orders between £5,000 and £25,000 to identify the best source of the goods/services. Written details of quotations obtained should be prepared and retained by budget holders for audit purposes. Telephone quotes are acceptable in cases of pressing need, subject to approval (written) by the Finance Director or Principal.
- 14.16. The options for different forms of tender (paragraph 14.19) can be applied to orders over £5,000 and less than £25,000.

### **Orders over £25,000**

- 14.17. All goods/services ordered with a value over £25,000, or for a series of contracts which in total exceed £25,000 must be subject to formal tendering procedures. The aggregated value over the contract term of purchases of goods or services over £189,330 net of VAT or recurring annual spend in excess of £70,778 net of VAT (as amended from time to time) may fall under EU procurement rules which requires advertising in the Official Journal of the European Union. Guidance on the OJEU thresholds is given in the Academies Financial Handbook. The Trust SLT will be informed of all formal tenders.
- 14.18. All projects or individual capital items over £50,000 that have not previously been approved by the Board as part of the business planning process or a Trust Re-forecast, must be approved by the Board, prior to capital commitments/ orders being placed. This does not prevent firm cost estimates being obtained to give Board assurance on project/ capital costs.

### **Forms of Tender**

14.19. 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 COO how best to advertise for supplier's 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 (possibly a specialised supplier e.g. Alternative Provision, Examination Fees, PFI costs (Inc. FM services), Rates, or Specialised Teaching Services) or very few suppliers are available;
  - extreme urgency exists; and
  - additional deliveries by the existing supplier are justified.

### **Preparation for Tender**

14.20. Full consideration should be given to:

- objective of project;
- overall requirements;
- technical skills required;
- after sales service requirements; and
- form of contract.

14.21. 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**

14.22. 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.

14.23. 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 for Consideration**

### ***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; and
- 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; and
- Details of previous sales and references from past customers.

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

- Pre sales demonstrations;
- After sales service; and
- Financial status of supplier. Suppliers 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**

- 14.24. The invitation to tender should state the date and time by which the completed tender document should be received by the Academy. 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**

- 14.25. 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 upto £35,000 - two of the following: Budget holder, Principal/ Headteacher/ Head of School, CEdo, and COO; and
  - For Contracts over £35,000 - the P/HdT/HdoS, CEdO or COO plus a member of the local AGC/ Finance and Resources Committee.

- 14.26. 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**

- 14.27. 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.
- 14.28. 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.
- 14.29. Full records should be kept of all criteria used for evaluation and for contracts over £25,000 a report should be prepared for the Finance and Operations Committee highlighting the relevant issues and recommending a decision. For contracts under £25,000 the decision and criteria should be reported to the Finance and Operations Committee.
- 14.30. Contracts over £50,000 will have been previously approved by the Trust Board, see 14.18 above.
- 14.31. 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.
- 14.32. The accepted tender should be the one that is economically most advantageous to the academy. All parties should then be informed of the decision.

## 15. **General Accounting Policies and Procedures**

### **General**

- 15.1. To ensure consistency of approach and valid comparison of Academies within the Trust, all financial and management accounts produced within the Trust must be prepared in accordance with Trust accounting policies.
- 15.2. Trust accounting policies are determined and set by the Trust Board. Any accounting treatment required, but not specified in the Trust's accounting policies, should be discussed with the COO, or nominated staff member.
- 15.3. All policies are to comply with the Financial Reporting Standard Applicable in the UK and Republic of Ireland (FRS 102), the Accounting and Reporting by Charities: Statement of Recommended Practice applicable to charities preparing their accounts in accordance with the Financial Reporting Standard applicable in the UK and Republic of Ireland (FRS 102) (Charities SORP (FRS 102)), the Academies Accounts Direction 2019/20 issued by ESFA, the Charities Act 2011 and the Companies Act 2006. The Trust is a public benefit entity under FRS 102 and has therefore applied the relevant public benefit requirements of FRS 102.
- 15.4. The Academy Finance Lead, or nominated staff member, is responsible for ensuring that all relevant accounting standards and accounting policies are adhered to.
- 15.5. All accounting procedures and records of the Trust shall be determined by the COO, or nominated staff member. These should be sufficient to satisfy statutory and regulatory requirements, to ensure effective management and safeguard the interests of stakeholders.
- 15.6. The following principles shall be observed, where possible, in the allocation of duties involving financial activity to ensure that a proper segregation of duties exists:
- The duties of providing information about money due to or from the Trust and of calculating, checking and recording these sums, shall be separated as completely as possible from the duty of collecting or paying them; and
  - Officers charged with the duty of examining and checking the accounts of cash transactions shall not themselves be engaged in any of these transactions.

15.7. It is the responsibility of the Trust Board, through senior management, to maintain accounting records sufficient at all times to:

- Identify assets and liabilities (including monthly accruals);
- Ensure properly due to amounts are paid out;
- Recognise and collect all income that is due; and
- Provide regular reports on the financial position to senior managers, Directors, the Board and Statutory or Regulatory bodies.

15.8. The following accounts and accounting records will be kept as a minimum requirement:

- General/ Nominal Ledger;
- Purchase Ledger;
- Sales Ledger;
- Cashbook (Via the finance system);
- Bank Statements;
- Payroll Records;
- Fixed Assets Register; and
- Investment Register;

15.9. The Academy Finance Lead, or nominated staff member, are responsible for the preparation and submission of statutory accounting information to the Trust COO, or nominated staff member, in accordance with the requirements of the Trust's Financial Policies and Procedures.

15.10. These financial statements should give a true and fair view of both the results for the period prescribed, and the net assets. The financial statements must be prepared in compliance with all relevant statutory and regulatory requirements, and in accordance with the approved Trust accounting policies and in accordance with the Trust format and timetable.

### **Value for Money**

15.11. The Trust's accounting officer will complete the necessary information required by the ESFA as outlined in the Academies Financial Handbook.

### **Income**

15.12. The main sources of income for the academy are the grants from the ESFA and Local Authorities (particularly in relation to Special Schools). The receipt of these sums is monitored directly by the Academy Finance Lead who is responsible for ensuring that all grants due to the academy are collected.

15.13. Other sources of income include:

- students, mainly for trips; and
- the public, mainly for sports lettings.

### **Trips**

15.14. The lead teacher must prepare a record for each student intending to go on the trip showing the amount due. A copy of the record must be given to the Finance Department.

15.15. Students should make payments at the Finance/Administration Department or the class teacher where practical e.g. in primary Academies. A receipt must be issued for all monies collected and the value of the receipt and the number of the receipt recorded against the student making the

payment. All academies must comply with the requirements for charging for pupil trips as set out in Sections 449 - 462 of the Education Act 1996 and supporting guidance from the DfE. The latest DfE guidance document is dated May 2018.

- 15.16. The Finance Department should maintain an up to date record for each student showing the amount paid and the amount outstanding.

### **Lettings**

- 15.17. If the Academy seeks to enter into an agreement with any party to manage the lettings of the premises, approval must be obtained from the AGC.

### **Custody**

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

- 15.19. Monies collected must be banked in their entirety in the appropriate bank account. The Finance Department is responsible for preparing reconciliations between the sums collected, the sums deposited at the bank and the sums posted to the accounting system. The reconciliations must be prepared promptly after each banking and must be reviewed and certified by the Finance Director/ Finance Manager.

### **Write off of debts and losses**

- 15.20. The Trust will pursue all income due. Any proposed write-offs are subject to AGC approval. In addition, the Trust COO must be informed to ensure that the requirements and reporting/ consent limits set by the ESFA are met.

### **Changes to Staffing Structures**

- 15.21. The CEO must be consulted in connection with proposals to change established staffing structures outside of the annual budget-setting process. He/she will then determine the process to approve the proposal, reflecting its scale including its impact on pupil outcomes and budgets.
- 15.22. Changes considered as part of the budget-setting process will require the approval of the AGC and Trust Board as part of that process.

### **Payroll**

- 15.23. The main elements of the payroll system and processes are:
- staff appointments;
  - payroll administration and
  - payments.

### **Staff Appointments**

- 15.24. The AGC has approved a personnel establishment for the academy as part of the budget-setting process.

- 15.25. The P/HdT/HdoS has authority to appoint staff within the authorised and budgeted establishment, except for Vice Principals/ Deputy Headteachers and Assistant Headteachers whose appointments must follow consultation with the CEdO and governors. The Principal maintains personnel files for all members of staff which include contracts of employment. All personnel changes must be notified, in writing, to the Academy Finance Lead immediately.

### **Payroll Administration**

- 15.26. The payroll is administered through one payroll provider.
- 15.27. All staff are paid monthly through the payroll provider. A master file is created for each employee which records:
- salary;
  - bank account details;
  - taxation status;
  - personal details and
  - any deductions or allowances payable.
- 15.28. All amendments made to the monthly payroll will be authorised by the P/HdT/HdoS or Academy Finance Lead. Any changes to the Principal's/ Headteacher's or the Academy Finance Lead salary will be approved by the Academy Governors. Any amendments relating to the Trust staff will be approved by the Trust Board.
- 15.29. The Finance Department will prepare and distribute a timetable for payroll processing specifying key dates for the month in question.

### **Payments**

- 15.30. Before payments are dispatched a printout of all data will be obtained from the payroll provider and this will be checked against source documentation by the Finance Department and then reviewed and initialled by the Academy Finance Lead or Head Teacher.
- 15.31. All salary payments are made by BACS. The Finance Department are responsible for reconciling the NI and pension deductions and ensuring the relevant amounts paid over.
- 15.32. After the payroll has been processed the nominal ledger will be updated. Postings will be made both to the payroll control account and to individual cost centres. The Finance Department will 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. The suspense account must be reconciled within 14 days.

### **Financial Delegations**

#### **16. General Revenue Expenditure**

- 16.1. Authority levels to commit and make payments in relation to revenue expenditure is approved by the Trust Board with reference to the person's position in the Trust and anticipated expense flows. The Authorities Schedules shown in Appendix A determines the posts which are authorised to make commitments and the limits to these commitments.

16.2. The Authorities Schedule details authority levels and limits in respect of approved budgets as well as limits relating to unbudgeted expenditure and virement between approved budgets.

17. **Capital Investment**

17.1. This category of contract expenditure relates to the Investment programme which is delivered and managed through the Trust's and Academy business plans and includes the following key elements:

- Development programmes (including new build schemes)
- Improvement programmes (including any capitalisation of major repairs).
- Procurement of other fixed assets (Including IT expenditure)

17.2. Development and Improvement programmes will be managed by the relevant Principal/ Headteacher/ Head of School (following budget approval of the Trust Board) and their respective senior management teams.

17.3. The management and control of the Trust's IT capital expenditure is the responsibility of the COO. Establishing and agreeing the Trust's IT capital expenditure programmes will be delivered as part of the annual business planning process and be based on a fully costed project plan. Overall approval of Trust IT expenditure will be made by the Trust Board on the recommendation of the Trust's Senior Management Team and incorporated into the Trust's annual business plan.

17.4. Financial commitment should be incurred under the terms of a contract which has been previously entered into under the Trust's procurement policy and procedures.

17.5. Authority to approve financial commitment / contracts and or purchase orders is delegated to officers specified below;

Capital Investment - Authority to Approve Financial Commitment / Purchase Orders / Contracts	
Description	Delegated Authority
<p><b><u>Contract Approvals (for services/ costs included within the approved budgets)</u></b></p> <p>All contracts approvals for Contracts/ Capital Investment programmes approved by Board, including financial limits</p>	<p>Principal/ Headteacher/ Head of School Between £5,000 and £10,000</p> <p>AGC (and informing CEoO) Between £10,001 and £25,000</p> <p>Above plus and SLT Between £25,000 and £50,000</p> <p>CEO Above £50,001</p>
<p>Contracts signed under Seal</p>	<p>Board or Delegated Officers</p>
<p><b><u>Purchase Order Approvals (for services/ costs included within the approved budgets)</u></b></p> <p>Specific purchase order approvals (within the above overarching Contract approvals) that have been included within approved by budgets or Re-forecasts.</p>	<p>Principal/ Headteacher/ Head of School Between £5,000 and £30,000</p> <p>AGC (and informing CEoO) or CEoO Above £30,000</p>

17.6. Key control assumptions include:-

- Only those members of staff relevant to the specific project have delegated financial authority for that project

17.7. The authority to approve payments in this context refers to the categories of expenditure as detailed in 17.1 above, and which has been previously committed in-line with 17.5 above and is delegated to the officers specified below;

<b>Authority to Approve Payments Committed Capital Investment – Contract Expenditure within Budget</b>	
<b>Description / Limits</b>	<b>Delegated Authority</b>
For all invoices, interim and final certificates up to the value of £30,000	See Appendix A
For all invoices, interim and final certificates up to Board and AGC approval limits	See Appendix A
For all invoices, interim and final certificates over Board and AGC approval limits	Trust Board

17.8. The approval of payments refers to the authorisation to make payments for goods / services committed. This will be achieved by the officer ensuring that the goods received note / interim certificate is in order, matches with the works order or other relevant contractual documentation and that work has been carried out / goods or services delivered in line with the contract terms.

17.9. Only those members of staff relevant to the specific project have delegated financial authority for that project. Projects should not be artificially split to allow the approval at a lower level of delegated authority. Limits should be cumulative per project.

17.10. Investment projects (summarised in 17.1 above) not within the Trust’s business plan or that do not meet the approved financial and commercial criteria, will be subject to a detailed scrutiny by the relevant AGC and approval will be dependent on a number of factors including the Trust’s financial capacity (current and future).

17.11. Investment projects that are not included in the Trust’s approved business plan or Re-forecast, will be subject to the approval of the appropriate AGC and/ or Trust Board in accordance with the following;

<b>Budget (or Forecast) Overspend per project</b>	<b>Approval From</b>
Up to £5,000 in total	Academy Principal ; Headteacher
Between £5,001 and £10,000	CEdO / AGC
Between £10,001 and £50,000	CEO / SLT
Over £50,001	CEO / Trust Board

## Appendix C - Code of Conduct for Members, Trustees, Trust Committee Members and Governors

### Code of conduct

The Co-op Academies Trust asks its Members, Trustees, Trust Committee Members and Governors to reflect Co-op values in all their work, making sure that the Ways of Being Co-op underpin everything they do.

Members, Trustees, Trust Committee Members and Governors should always follow the seven Nolan principles of public life as these provide a framework for good and effective work in a public office. These are:

#### 1. Selflessness

Holders of public office should act solely in terms of the public interest.

#### 2. Integrity

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

#### 3. Objectivity

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

#### 4. Accountability

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

#### 5. Openness

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

#### 6. Honesty

Holders of public office should be truthful.

#### 7. Leadership

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

Specifically, Members, Trustees, Trust Committee Members and Governors of the Co-op Academies Trust must:

- Always work in the best interest of the Trust, its academies/college, its pupils, parents and staff;
- Familiarise themselves with safeguarding procedures and policies and always prioritise the safeguarding of children and young people, accepting that safeguarding is always everyone's business;
- Complete an application for a disclosure and barring check within three weeks of their appointment / election;
- Uphold the Co-op values and Ways of Being Co-op and be an ambassador for the Trust/academy in all aspects of public and personal life, including social media;
- Attend all relevant meetings other than in exceptional circumstances, and, when unable to attend, send apologies explaining these circumstances to the clerk or chair;
- Prepare for meetings by reading meeting paperwork and considering any questions that arise
- Engage in meetings by contributing appropriately and asking questions where relevant, always treating others with respect
- Take responsibility for their own development, undertaking relevant e-learning and face to face training as requested
- Follow trust policies in all interactions with the Trust/Academy/College staff
- Be diligent and transparent in declaring personal interests, and not use any information gained in the role for personal gain
- Keep the information received through meetings and their role confidential
- Uphold and promote the Co-op values and ways of being Co-op in their own conduct and in their decision-making
- Act as part of the Members/Trust Board/AGC team, understanding that decisions are made as a collective, with responsibility lying with the group as a whole, not with them as an individual

#### How we deal with concerns

If any concerns arise, the Trust will act with fairness, openness, and transparency, but breaches of this code of conduct could potentially lead to the removal of a Member, Trustee, Trust Committee Member or Governor.

## Appendix D: Operating Principles for the Co-op MAT Trust Board

### 1. Trust Board Membership

The size of the Trust Board is determined by the articles of association as 3-15 trustees appointed by the Members. The Trustees are permitted by the articles to co-opt as many additional board members (under article 58) as they wish.

### 2. Appointment and Removal of Trustees

When Trustees are appointed by the Trust's Members, this will be by majority vote at a Members' meeting or by written resolution, usually following a recommendation from the Chair of the Trust Board.

Co-opted Trustees are appointed by the Trust Board on the basis of a majority vote at a quorate board meeting. Other Co-opted Trustees do not have voting rights in this context.

Trustees will be appointed or co-opted on the basis of the relevant skills, experience and capacity which they offer to the role; they will be asked to outline this in advance of their appointment, usually via an interview with the Chair of the Board.

### 3. Recruitment Checks

All trustees must sign the Trust's code of conduct and must complete an application for a disclosure and barring service (DBS) check within three weeks of their appointment or election. The DBS requirement does not apply to Trust employees who will already have a valid DBS check carried out by the Trust. DBS checks completed for roles outside the Trust are not valid.

### 4. Term of Office

The term of office for all trustees, other than the Chair, is four years. The Chair is a trustee ex-officio, by virtue of their office within the Co-op Group. As long as they remain eligible, a trustee can be re-appointed or re-elected at the end of their term of office for a maximum of one further term. This means that the maximum length of time an individual can serve as a trustee with the Co-op MAT is eight years.

Once a trustee has served for eight years and left the Trust Board they would be eligible for re-appointment once twelve months has elapsed.

### 5. Resignation

A trustee may resign their position at any time by writing to the Trust's Head of Governance or the Trust Board Chair, as long as at least three trustees remain in post.

### 6. Removal and Suspension of Trustees

Any appointed trustee can be removed from the Trust Board by the Members at any time; any co-opted trustee can be removed by the Trust Board, in line with article 66. This would usually be for one of the following reasons:

- They have acted in a way that is inconsistent with the ethos of the Trust;
- They have brought or are likely to bring the Trust or the office of Trustee into disrepute;
- They are in breach of the duty of confidentiality to the Trust, or to any member of the Trust's staff or a pupil at an academy;
- They are in breach of the Trust's code of conduct for trustees in some other way.

Before making a decision to remove a Trustee the Members or the Trust Board will consider anything the individual Trustee wants to say about the issue, and will consult the Trust's Head of Governance.

A Trustee who is employed by the Trust, who is suspended from their paid role within the trust will, without any further action being needed, also be suspended as a Trustee, for the same period of time.

## 7. Qualification as a Trustee

All Trustees must be at least eighteen years old and may not be a current pupil of any Co-op academy.

A Trustee will stop being a Trustee automatically if they become incapable by reason of mental disorder, illness or injury of managing their own affairs.

A Trustee will be removed from the role if they are absent without permission from all the full meetings of the trust board as well as any committee they are a member of, held within a period of six months, and the Trust Board resolves that they are removed. To be granted permission for absence the Trustee must have submitted apologies to either the Chair or the Trust's Head of Governance in advance of the meeting, and the meeting minutes must reflect that the Trustee's apologies were accepted by the meeting.

An individual is disqualified from being a Trustee in the Co-op MAT if any of the disqualification criteria relating to bankruptcy, disqualification as a company director or charity trustee, prohibited or restricted employment or criminal convictions apply, as detailed in Articles 71-74.

## 8. Appointment / Election of Chair and Vice Chair

### Appointment of Chair

The chair will be elected at the first meeting of each academic year; nominations for the role of chair will be invited from the Co-op Group in advance of this meeting. No Trustee who works for the Trust will be able to be chair. The Chair has particular responsibility for providing effective leadership on matters such as:

- formulating the Board's strategy for discharging its duties;
- encouraging high standards of propriety;
- representing the views of the Board externally and internally; and
- providing for the induction, training, objectives and assessment of individual Board members
- advising the Co-op on the performance of the Trust, and of the Chief Executive Officer.

The chair will be automatically removed from the role, with no further action needed, if they stop being an employee of the Co-op Group.

Where the position of chair falls vacant the Trust Board must elect a new chair at its next meeting.

### Election of Vice Chair

The vice chair will be elected at the first meeting of the academic year. No Trustee who works for the Trust will be able to be vice chair. All eligible trustees will be asked by the Head of Governance in advance of the relevant meeting whether they wish to nominate themselves for the role of vice chair. Where more than one person has put themselves forward for the role of vice chair there will be a secret ballot at the meeting.

The vice chair can resign from the role at any time by writing to the Chair or the Trust's Head of Governance. Where the position of chair becomes vacant the Vice Chair will act as Chair until the position is filled; where the position of vice chair falls vacant the Trust Board must elect a new vice chair at its next meeting. Self-nominations will be invited in advance of that meeting if time allows, otherwise self-nominations will be invited from all eligible trustees at the meeting.

If the Chair is unable to attend a meeting the vice chair will act as chair for the purposes of that meeting. If the vice chair is also absent the Trust Board will elect a chair for the purposes of that meeting, which may not be a trustee who is employed by the trust.

### 9. Removal of the Chair / Vice Chair

The chair may be removed from the role by the Members but, before the chair is removed, the Members will consider representations from the chair, and consult with the Trust's Head of Governance.

The vice chair may be removed by the Trust Board. Any decision to remove the vice chair must be a specified agenda item at a trust board meeting, and the vice chair must be given the opportunity to speak on their own behalf, before leaving the meeting while a vote is taken on the issue via secret ballot.

### 10. Conflict of Interest

A trustee will be considered to have a conflict of interest, and should withdraw from any related discussion and vote, in any situation where:

- there may be a conflict between the individual interests of the trustee and the interests of the Trust or any of its academies;
- a fair hearing is required and there is any reasonable doubt about a trustee's ability to act impartially;
- The trustee has a direct or indirect pecuniary interest.

Where there is any disagreement about whether a trustee should withdraw this will be determined by a vote of the other trustees present. If a trustee leaves the meeting in this context they no longer count towards the quorum.

## 11. Committees

The Trust Board may establish any committees it chooses, and is required to have an audit and risk and a finance committee. The terms of reference, proceedings and membership of each committee are published on the trust website and must be reviewed annually, and approved at the first Trust Board meeting of the academic year. The membership of a committee can include people who aren't trustees, but they won't be able to vote, and the majority of the members present at any committee meeting, must be trustees. People who serve on a committee but are not trustees are not entitled to attend Trust Board meetings.

## 12. Meeting Papers

At least seven clear days before each board and committee meeting all trustees will be provided with a copy of the agenda and all papers to be discussed at the meeting. Papers should only be tabled at meetings, or distributed less than seven clear days in advance of the meeting, in exceptional circumstances which are agreed as such by the Chair of the Board or the relevant Committee.

Minutes of the meeting will be drawn up by the clerk, in line with current trust guidance, and shared with the Chair, usually within seven days of the meeting, and then circulated to all trustees. In circumstances where the clerk, or an appropriate substitute, has not been able to attend the meeting, a trustee or other attendee may be nominated to act as minute-taker for that meeting. The minutes will be approved at the next meeting of the Board, or, in the case of committee minutes at the next Committee meeting, and signed by the Chair as a true record.

The agenda for every meeting of the Board, including committee meetings, all reports and documents for each meeting and the signed minutes of meetings will be made available, as soon as possible after each meeting, to be viewed at all academies, by anyone who asks to see them. This does not apply to any paper or minutes that the Board, or the Committee, has decided is confidential; confidential matters include anything relating specifically to a pupil or potential pupil of any academy and their

family, a member of staff or a potential member of staff of any academy or of the central team.

### 13. Trust Board Meetings

The Trust Board can choose to meet more frequently, but must meet at least three times each year, and the current DfE guidance advises the board to meet six times per year. Co-op Academy Trust has agreed that the board will meet at least quarterly, and will usually hold an additional development/strategy meeting during the summer term.

Other than the development/strategy meeting, meetings will last up to three hours. Meetings will usually be held in Manchester at 1 Angel Square, or virtually via an electronic meeting platform.

Meetings will usually be convened by the Chair, but any three trustees can put a request to the Clerk to the Board to convene a meeting and the Clerk must do so. When the Chair considers the issue(s) to be discussed to be urgent they can call an additional meeting with less than the usual notice, but otherwise trustees must be given at least seven clear days' notice of a meeting.

The usual quorum for a Trust Board meeting, which is the number of trustees who need to be present for the meeting to be valid, is 50% of the trustees in post at that time, not including any vacancies, rounded up to the nearest whole number. The quorum for removing a co-opted trustee is two thirds of the trustees in post at that time, not including any vacancies, rounded up to the nearest whole number.

The quorum for a committee meeting is three trustees.

#### 13.1 Trust Board Decisions

Every question to be decided at a Trust Board meeting, or one of its committees, will be decided by a simple majority of the trustees present; no votes can be cast by proxy. Other than in contested ballots for the role of vice chair, votes will usually be determined by a show of hands, unless a secret ballot is requested by the Chair or any trustee present. If there is an equal division of votes the chair of the meeting will have a second and casting vote.

There may be pressing circumstances where decisions have to be taken outside Board meetings. Where decisions that would ordinarily be taken at Board meetings have to be made on an urgent basis, they may be taken by the Chair in consultation with the Chief Executive Officer of the Trust, and will then be reported at the next Board meeting, with an explanation of the urgency.

The decision will be recorded in the minutes of the Board meeting.

In between meetings the Board is also allowed to make a decision by way of a resolution in writing. This is a document signed by every trustee. In practice this may be a number of identical documents, and electronic signatures (or email confirmations) are acceptable. Decisions made in this way should be minuted at the next board meeting.

## Appendix E: Operating Principles for the Co-op MAT Academy Governing Councils (AGCs)

### 1. AGC membership

Academies can choose the size of their AGC within the range set by the Trust which is, ordinarily, 8-12 members. The maximum of 12 was introduced on 1 September 2021 and some AGCs had more members at that point. Over time, as governors leave, the maximum membership will take effect for existing academies in that position.

Governors are appointed from the following groups, which are explained below:

- 2-4 sponsor governors;
- 2 parent governors, elected or appointed as outlined below;
- Up to 2 staff governors;
- The headteacher / principal;
- Up to 4 community governors.

The Trust Board has the right to appoint additional governors, over and above the usual number, at any point, if it has concerns about the AGC or needs to strengthen it for any reason.

The membership of the AGC will usually include 1 staff governor, but the AGC can choose to have a second staff governor where it feels this is justified. This justification should be minuted at a full AGC meeting. Where there is 1 staff governor this individual will be a member of teaching or support staff. Where there are 2 staff governors one should be a member of the teaching staff and the other a member of the support staff.

#### 1.1 Staff governors

Staff governors are elected by the staff of the academy. All staff employed by the Trust to work at the Academy, other than members of the senior leadership team and the school business manager, are eligible to put themselves forward for the role(s), and any election where more than one person puts themselves forward will be decided by a secret ballot of all staff, administered by the academy. A staff governor stops being a governor if they leave the employment of the Trust or move to a role not based at that academy.

The Headteacher/Principal is an "ex-officio" member of the AGC. This means that they are automatically a governor because of the job that they have, and their appointment as a governor continues as long as they're employed as Headteacher/Principal in that academy.

#### 1.2 Parent governors

Parent governors are elected by the parents and carers of pupils at the academy. Any parent or registered carer of a pupil is eligible to put themselves forward for the role,

and any election where more than one person puts themselves forward will be decided by a secret ballot of all parents and carers, administered by the academy.

Where the role of Parent Governor has been advertised at least once and nobody has put themselves forward for the role, the AGC is permitted to appoint someone as a parent governor. This person must be the parent of a school-aged child, but the child doesn't have to be a pupil at the academy. A decision to appoint a parent governor in this way should be agreed at an AGC meeting.

### 1.3 Sponsor Governors

Sponsor governors are governors appointed by the Co-op Group, via the chair of the Trust Board. These will usually be Co-op employees, and the chair of governors will usually be appointed by the chair of the Trust Board from this group. Sponsor governors will be nominated for appointment by the Co-operative Partnership Manager (Education) and the Trust's Head of Governance, and their appointment will be approved by the chair of the Trust Board, in consultation with the CEO.

### 1.4 Community Governors

Community governors are appointed by the AGC because of the skills, experience and/or community links that they bring. They are likely to be part of, or have links with, the geographical or student community served by the academy, but an individual from outside this community may be appointed where they are considered to bring valuable skills and experience not present elsewhere within the AGC.

This may include representatives from the local authority or other specific partnerships that the academy values. The name 'community governor' was changed from 'co-opted governor' on 1 September 2021. All co-opted governors were re-named community governors at that point and their existing term of office continued to apply.

A decision to appoint a community governor should be agreed and minuted by the AGC at a quorate AGC meeting, after ensuring the trust-agreed appointment process has been followed.

Community governors must supply two satisfactory references to the Trust Governance Team, and be interviewed by the regional Governance Manager, before their appointment can be approved by the AGC.

## 2. Recruitment Checks

All governors must sign the Trust's code of conduct (Appendix C) and must complete an application for a disclosure and barring service (DBS) check within three weeks of their appointment or election. The DBS requirement does not apply to staff governors who will already have a valid DBS check carried out by the academy. DBS checks completed

for roles outside the Trust cannot be re-used. Failure to complete the DBS application within this time period is likely to result in the Governor being removed from the AGC.

### 3. Term of Office

The term of office for all governors, other than the Headteacher/Principal, is four years. The Headteacher/Principal is automatically a governor for the whole time they are in that role. As long as they are still eligible, a governor can be re-appointed or re-elected at the end of their term of office for a maximum of one further term. This means that the maximum length of time someone can stay as a governor on the same Co-op Academy AGC is eight years.

The maximum of eight years was introduced in September 2021, and some AGCs had longer-serving governors at that point. Over time, as governors' terms of office come to an end, governors in that position will not be eligible for re-appointment or re-election at that academy.

If a governor is still willing to serve and is no longer eligible to be reappointed / elected in their original academy they will be encouraged to consider appointment to another Co-op academy.

Where a governor has been on the governing body of the predecessor school for longer than four years at the time of conversion into the Trust and is reappointed/re-elected to the new AGC, they will be eligible to be appointed/elected for a maximum of one further four year term.

### 4. Resignation

A governor may resign their position at any time by writing to the AGC Clerk/Governance Team or the AGC Chair.

### 5. Removal and Suspension of Governors

Any governor can be removed from the AGC at any time by the Chair of the Trust Board, for any of the following reasons:

- They have acted in a way that is inconsistent with the ethos of the Trust;
- They have brought or is likely to bring the Academy or the Trust or the office of governor into disrepute;
- They have in breach of the duty of confidentiality to the Trust, the Academy or to any member of staff or pupil at the Academy;
- They have in breach of the Trust's code of conduct for governors in some other way.

A governor can also be suspended for a period of up to six months where this is considered to be a reasonable course of action by the Chair of the Trust Board, for example where an investigation is pending into an issue that could potentially lead to

the governor's removal. While a governor is suspended they will not be allowed to attend governors' meetings, receive meeting papers or otherwise have access to AGC information.

Before making a decision to remove or suspend a governor, the Chair of the Trust Board will consider anything the individual governor wants to say about the issue, and will consult the chair of the AGC.

A staff governor who is suspended from their paid role in an academy will, without any further action being needed, also be suspended as a governor, for the same period of time.

## 6. Qualification as a governor

All governors must be at least eighteen years old and may not be a current pupil of the academy.

A governor will stop being a governor automatically if they become incapable by reason of mental disorder, illness or injury of managing their own affairs.

A governor will be considered to have resigned from the AGC if they are absent without permission from all the full meetings of the AGC held within a period of six months, starting from the date of the first meeting missed. To be granted permission for absence the governor must have submitted apologies to either the chair or the AGC Clerk/Governance Team in advance of the meeting, and the meeting minutes must reflect that the governor's apologies were accepted by the meeting.

An individual is disqualified from being a governor in a Co-op academy if any of the disqualification criteria relating to bankruptcy, disqualification as a company director or charity trustee, prohibited or restricted employment or criminal convictions apply, as detailed in Schedule 4 of the The School Governance (Constitution) (England) Regulations 2012, or any regulations which replace these.

## 7. Appointment / Election of Chair and Vice Chair

The chair of the AGC will be appointed by the Trust Board every year, at the beginning of the autumn term. The vice chair will be elected by the AGC at the first meeting of the autumn term, for a term of office which will last until the first meeting of the following autumn term. No governor who works at the academy will be eligible to be chair or vice chair. All eligible governors will be asked by the AGC clerk in advance of the first meeting of the autumn term whether they wish to nominate themselves for the role of vice chair. Where more than one person has put themselves forward for the role of vice chair there will be a secret ballot at the meeting.

The chair or vice chair can resign from the role at any time by writing to the clerk to the AGC, or a member of the Trust's Governance Team, and will automatically stop being

chair/vice chair if they choose to leave the AGC or are removed for some reason. Where the position of chair becomes vacant the vice chair will act as chair until the position is filled by the Trust Board Chair; where the position of vice chair falls vacant the AGC must elect a new vice chair at its next meeting. Self-nominations will be invited in advance of that meeting if time allows, otherwise self-nominations will be invited from all eligible governors at the meeting.

If the chair is unable to attend a meeting the vice chair will act as chair for the purposes of that meeting. If the vice chair is also absent the AGC will elect a chair for the purposes of that meeting, which may not be a governor who works at the academy.

#### 8. Removal of the Chair / Vice Chair

The chair may be removed from the role by the Chair of the Trust Board, but, before a chair is removed, the Chair of the Trust Board will consider representations from the chair and consult with the Trust's Head of Governance.

The vice chair may be removed by the AGC. Any decision to remove the vice chair must be a specified agenda item at an AGC meeting, and the vice chair must be given the opportunity to speak on their own behalf, before leaving the meeting while a vote is taken on the issue via secret ballot.

#### 9. Conflict of Interest

A governor will be considered to have a conflict of interest, and should withdraw from any related discussion and vote, in any situation where:

- there may be a conflict between the individual interests of the governor and the interests of the academy/college;
- a fair hearing is required and there is any reasonable doubt about a governor's ability to act impartially;
- The governor has a direct or indirect pecuniary interest.

A staff governor should withdraw from any discussion where they have an interest that is greater than that of the generality of the staff.

Where there is any disagreement about whether a governor should withdraw this will be determined by a vote of the other governors present. No staff governor, other than the headteacher/principal, may be present during the discussion of another member of staff's performance management or pay.

#### 10. Meeting Minutes

Minutes will be drawn up by the designated AGC Clerk in line with current Trust guidance. In circumstances where the clerk, or an appropriate substitute, has not been

able to attend the meeting a governor or other attendee may be nominated to act as minute-taker for that meeting.

The minutes will be approved at the next meeting. Following their approval the minutes will be marked as 'signed' on the GovernorHub system, or any system that replaces this. A copy of the non confidential minutes will be available for inspection within the academy on request.

## 11. Committees

All AGCs will have a pay committee which will meet (in person or virtually) at least once a year (during the autumn term) to scrutinise and approve the Headteacher's/Principal's pay recommendations. Other than the Headteacher/Principal, no governor employed to work at the academy may be present during the discussion of any other member of staff's pay or performance management.

Other than the pay committee, AGCs will not usually have any committees but may establish working parties as required, which may include both governors and staff members. An exception to this will be if the AGC has chosen to retain its finance committee, or equivalent. In this case one finance committee meeting will take place each term, usually immediately prior to the second full AGC meeting of the term.

## 12. AGC Meetings

The AGC must meet at least six times each year, once each half term. Meetings will usually be convened by the chair, but any three governors can put a request to the AGC clerk to convene a meeting and the clerk must do so.

At least six days before the meeting all governors must be provided with a copy of the agenda and all papers to be discussed at the meeting. Papers should only be tabled at meetings, or distributed less than six days in advance of the meeting, in exceptional circumstances which are agreed as such by the Chair of the AGC.

When the Chair considers the issue(s) to be discussed to be urgent they can call a meeting with less than the usual six days' notice.

The quorum for an AGC meeting, which is the number of governors who need to be present for the meeting to be valid, will be 50% of the number of governors on the AGC at that time, not including any vacancies, rounded up to the nearest whole number.

The quorum for a committee meeting is three governors, at least two of whom do not work at the academy. The quorum for a pay committee meeting is three governors, none of whom may work at the academy.

## 12.1 AGC Decisions

Every question to be decided at an AGC meeting, or one of its committees, will be decided by a simple majority of the governors present; no votes can be cast by proxy. Other than in contested ballots for the role of Vice Chair, votes will usually be determined by a show of hands, unless a secret ballot is requested by the Chair or any governor present. If there is an equal division of votes the Chair of the Meeting will have a second and casting vote.

In between meetings the AGC can make a decision by way of a written resolution. This is a document signed by every governor. In practice this may be a number of identical documents, and electronic signatures (or email confirmations from the confirmed email addresses declared on GovernorHub for each governor) are acceptable.

In circumstances where there is a risk of a serious detriment to a pupil, a pupil's family, a member of staff or the academy as whole, and it is not reasonable to call a meeting or reach a decision by written resolution the Chair can make a decision on behalf of the AGC. Any decisions taken in this way must be reported and minuted at the next AGC meeting.

## 12.2 Meeting Documents

The agenda for every meeting of the AGC, all reports and documents for each meeting and the signed minutes of meetings will be made available, as soon as possible after each meeting, for inspection at the academy, by anyone who asks to see them. This does not apply to any paper or minute that the AGC has decided is confidential; confidential matters include anything relating specifically to a pupil or potential pupil and their family, a member of staff or a potential member of staff.

## 12.3 Meeting Attendance

The following are entitled to attend meetings of the AGC:

- All elected, appointed or ex-officio governors of the academy;
- Any trustee (with the agreement of the Trust Board);
- The Chief Executive Officer of the Trust or their representative;
- The Clerk to the AGC;
- Anyone else, with the permission of the AGC.

Governors can participate in meetings of the AGC, and committee meetings, by telephone or video conference, provided that they have arranged this in advance and it has been possible to make appropriate arrangements. A governor participating virtually will count towards the quorum for the meeting as if they were in attendance in person. If a secret ballot takes place, arrangements should be made for governors attending virtually to make their views known privately to the Clerk to the Meeting; if, after all

reasonable efforts, it does not prove possible for the person to participate by telephone or video conference, the meeting may still go ahead as long as it is otherwise quorate.

The AGC can also agree for meetings to be conducted entirely via a virtual meeting platform.

## Appendix F: Scheme of Delegation

The following descriptions are used in this document to describe the roles of the various groups and individuals.

### Accountable (and Approver) - A

Ultimately answerable for the task being delivered. Delegates the task to those responsible. There should be only one group/person accountable for each task/decision.

### Responsible – R

Responsible for the delivery. Does the work to achieve the task. Can be shared between groups/individuals.

### Consulted – C

Needs to be involved before the decision is made. Communication is two-way – these are important stakeholders or have relevant specialist knowledge in the subject.

### Informed – I

Those to be kept up-to-date on progress. Communication is one-way, and may be updated only when the decision has been taken or the task completed.

References to the CEO include members of the central team to whom the CEO will delegate, for example the Chief Operations Officer, in relation to financial matters and the Chief Education Officers, in relation to educational matters.

Activity		TB	CEO	AGC	HT
1. Governance					
1.1	Setting Trust vision	A R			
1.2	Setting Trust culture and values	A R			
1.3	Setting Trust strategic plan	A	R	C	C
1.4	Undertaking regular skills audits of trustees				
1.5	Undertaking regular skills audits of governors				
1.6	Reporting on the effectiveness of AGCs		A R	C	C
1.7	Establishing and appointing board committees	A R			
1.8	Ensuring statutory policies are in place and published as needed	A	R	C	C
1.9	Comply with all Trust policies	A	R	R	R
1.10	Nominating Lead Trustee for Safeguarding and SEND	A R			
1.11	Ensure Trust website is maintained and compliant with statutory requirements and DfE/ESFA expectations and in line with Trust brand requirements	A	R		

1.12	Ensure academy websites are maintained and compliant with statutory requirements and DfE/ESFA expectations and in line with Trust brand requirements		C	A	R
1.13	Procure appropriate governor indemnity insurance	A	R		
1.14	Appoint (and remove) to the post of the Chair of AGC	A	R	I	C
1.15	Appoint (and remove) to the post of Vice-chair of the AGC	A		A R	I
1.16	Hold 6 AGC meetings a year		I	A R	C
1.17	Approve/ratify the appointment of (and remove) sponsor governors	A	R	R	I
1.18	Approve the appointment of community governors		C	A/R	I
1.19	Establish the process for electing parent and staff governors		A/R	I	I
1.20	Implement the process for electing parent and staff governors		C	I	A
1.21	Set up register of governors' business interests and ensure these are published on academy website		I	A	R
1.22	Set up register of Trustees' business interests and ensure these are published on Trust website	A	R		
1.23	Approve and set up governors' expenses scheme	A	R		
1.24	Approve and set up trustees' expenses scheme	A	R		
1.25	Consider whether or not to delegate functions to individuals or working groups of AGCs	A	R	R	
1.26	Provide a summary of actions and/ or decisions taken by AGCs for the Trust Board	I	R	A	
1.27	Determine the indicators that trigger the withdrawal of delegated responsibility	A	R	I	I
1.28	Review scheme of delegation annually	A	R	I	I
1.29	Maintain a register of Governor training			A	R

Activity		TB	CEO	AGC	HT
2. Finance					
2.1	Approve Trust three year business plan	A	R	I	I
2.2	Approve Trust budget plan for the financial year	A	R	I	I
2.3	Approve academy three year business plan (subject to board approval 2.1 & 2.2)		I	A	R
2.4	Approve Academy budget plan for the financial year (subject to Board approval 1.1 & 1.2)		I	A	R
2.5	Monitor monthly expenditure including all additional school funds		I	R	A
2.6	Report monthly expenditure including all additional school funds		A		R
2.7	Monitor quarterly expenditure including all additional school funds and debts	R	A	R	
2.8	Report and review quarterly expenditure including all non-general academy grant funding and any debt collection	R	A	I	
2.9	Approve revenue expenditure – budgeted	See Section 8 of the Financial Regulations (and summarised in Table 1 below)			
2.10	Approve revenue expenditure – unbudgeted.	See Section 8 of the Financial Regulations			
2.11	Approve capital expenditure – budgeted	See Section 17 of the Financial Regulations (and summarised in Table 1 below)			
2.12	Approval of capital expenditure – unbudgeted	See Section 17 of the Financial Regulations			
2.13	Establish and publish Trust-wide charging and remissions policy	A	R	C	I
2.14	Establish and publish academy-level charging and remissions policy	I		A	R
2.15	Bad debt write-off in accordance with Academies Financial Handbook	A	R		I
2.16	Issuance of guarantees, indemnities and letters of comfort	A	R	I	I
2.17	Appoint auditors	A	R	I	I
2.18	Approve financial policy, procedures and controls across Trust	A	R	C	C
2.19	Comply with the Academies Financial Handbook including cheques/ BACS Processed by the Academy to be signed in accordance with the scheme of delegation/ bank mandate	A		R	R

2.20	AGC and Principal required to obtain the prior approval of the SLT before entering into a contract with a value in excess of £25k within a year	See Section 17 of the Financial Regulations (and summarised in Table 1 below)
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Activity	TB	CEO	AGC	HT	
3. Human Resources					
3.1	Determine academy staffing structures in accordance with approved budgets		C	A	R
3.2	Approval of appointments falling outside of the academy approved budget	A	R	C	R
3.3	Central Trust senior leadership team (SLT) appointments in accordance with budget decisions / approvals	A	R		
3.4	Trust central and hub team appointments (exc. SLT) in accordance with budget decisions/approvals	I	A R		
3.5	Executive Principal/Principal/Headteacher appointments	A	R	C	
3.6	Head of school appointments	I	A R	C	
3.7	Vice principal/deputy headteacher appointments in accordance with budget decisions/approvals		C	A	R
3.8	All other academy-based appointments within approved budgets			A	R
3.9	Determine pay policy (including discretions)	A	R	I	I
3.10	Determine trust-wide terms and conditions of employment	A	R	I	I
3.11	Implement pay policy and terms and conditions of employment within academies			A	R
3.12	Determine performance management (PM) policy	A	R	I	I
3.13	Undertake PM of CEO	A R			
3.14	Undertake PM of Headteacher / Principal		A R	C	
3.15	Implement PM policy and undertake performance management of all other academy staff		I	A	R
3.16	Implement PM Policy and undertake performance management of central and hub staff	I	A R		
3.17	Determine disciplinary and capability policies	A	R	I	I
3.18	Implement disciplinary and capability procedures in respect of headteachers/principals		A R	C	I

3.19	Implement disciplinary and capability procedures in respect of all other academy staff		C	A	R
3.20	Implement disciplinary and capability procedures in respect of central Trust SLT	A R (for CEO)	R		
3.21	Implement disciplinary and capability procedures in respect of all other central and hub staff		A R		
3.22	Lead Trust wide relations with trade unions, and agree trade union recognition and facility agreement (TURFA)	A	R	I	I
3.23	Lead Academy wide relations with trade unions, and implement TURFA		I	A	R
3.24	Approval of all exit payments exceeding contractual notice (e.g. settlement agreements, redundancy payments) in accordance with the Academies Financial Handbook	See Section 8 of the Financial Regulations (and summarised in Table 1 below)			
3.25	Approval of early retirement (where there is a cost to the organisation)	A	R	I	C
3.26	Approval of pension discretions within the local government pension scheme (LGPS) requirements	A	R	I	C
3.27	Ensure compliance with equalities legislation	A	R	C	C

Activity		TB	CEO	AGC	HT
4. Curriculum and Learning					
4.1	Prepare and agree Trust curriculum and qualification statement	A	R	C	C
4.2	Implement curriculum and qualification policy		A	C <del>A</del>	R
4.3	Monitoring standards of teaching		A	C <del>A</del>	R
4.4	Decide which subject options will be taught		A	C <del>A</del>	R
4.5	Set targets for Trust outcomes	A	R	I	I
4.6	Deliver targets for academy outcomes	I	A	C <del>A</del>	R
4.7	Plan and deliver academy improvement strategies		A	C <del>A</del>	R
4.8	Determine Trust student/ pupil discipline principles statement	A	R		
4.9	Implement AGC discipline policy based on Trust principles statement			A	R
4.10	Statutory review of permanent and fixed term exclusions		C	A	R

4.11	Direct reinstatement of excluded students			A	R
4.12	Set admissions policy and ensure this is reviewed in line with statutory requirements	A	C	R	
4.13	Form student admission appeals panel and conduct admission appeals process			A	R
4.14	Any reduction or increase to the published admission number (PAN)	A		R	C
4.15	Arrange for collective worship			A	R
4.16	Set times of academy day and dates of academy terms and holidays		I	A	R
4.17	Ensure that academy meets 380 sessions in an academic year		I	A	R
4.18	Prepare and publish the academy prospectus			A	R
4.19	Ensure provision of free academy meals to those students meeting the criteria			A	R
4.20	Adopt and review home/academy agreements			A	R
4.21	Discharge duties in respect of students with special needs by appointing a "responsible officer"			A	R
4.22	Ensure compliance with SEND Code of Practice	I	C	A	R
4.23	Deliver support for looked after children	I	C	A	R
4.24	Approve non-routine educational visits involving adventurous activities and/or overnight stays, and/or foreign travel		A	R	C
4.25	Approve all other educational visits			I	A R

Activity		TB	CEO	AGC	HT
5. Buildings					
5.1	Ensure that health and safety regulations are followed including regular audits		I	A	R
5.2	Building insurance and personal liability	A	R	I	I
5.3	Maintain Academy buildings in accordance with approved Academy buildings strategy and approved revenue budget			A	R
5.4	Approval of unbudgeted capital projects in excess of £50k Note that costs associated with the tender preparations are acceptable as long as the project has been approved as part of the annual budget process.	See Section 17 of the Financial Regulations			
5.5	Establish a Trust Health and Safety Policy (including risk assessment)	A	R	I	I

5.6	Implement the Health and Safety Policy approved by the Trust Board and Undertake risk assessments in accordance with that Policy		I	A	R
5.7	Request an external audit of Health and Safety practice	A	R	I	
5.8	Produce Academy buildings strategy for approval		A	R	R

Activity		TB	CEO	AGC	HT
6. Other					
6.1	Agree and monitor academy strategy around community engagement			A	R
6.2	Agree and implement procedures for reporting to parents		I	A	R
6.3	Ensure stakeholder voices are heard in trust-wide decision making	A	R		
6.4	Ensure stakeholder voices are heard in local decision making			A	R
6.5	Set trust-wide policy in relation to safeguarding children and young people in line with statutory requirements and monitor its effectiveness	A	R		
6.6	Set academy level policy in relation to safeguarding children and young people in line with Trust and statutory requirements, including appointing a suitably trained designated safeguarding lead (DSL), and monitor the effectiveness of this	A	C	R	
6.7	Agree Trust branding in agreement with the sponsor	A	R	I	I
6.8	Comply with Trust branding			A	R
6.9	Establish a Risk Management Policy (including Risk Registers)	A	C	R	I
6.10	Maintain, monitor and report in respect of trust-wide risk registers in accordance with the Risk Management Policy	A	R		
6.11	Maintain, monitor and report in respect of academy risk registers in accordance with the Risk Management Policy			A	R

**Table 1**

Scheme of Delegated Authority							
Approved Activity/ Expenditure	Board	DoT	SLT	AGC	Principal/ Headteacher	Academy Fin Lead	Specified Budget Holder
	Lim/ Value	Lim/ Value	Lim/ Value	Lim/ Value	Lim/ Value	Lim/ Value	Lim/ Value
	£	£	£	£	£	£	£
<b>1. General Purchase Orders (Within approved budget)</b>							
-Orders	UWAB or F'cast	UWAB or F'cast	UWAB or F'cast	UWAB or F'cast	£30,000	£5,000	£2,000
-Invoices	UWAB or F'cast	UWAB or F'cast	UWAB or F'cast	UWAB or F'cast	£30,000	£5,000	£2,000
<b>2. Contracts/ Capital Expenditure</b>							
-Awarding contract	UWAB or F'cast	UWAB or F'cast	£50,000	£25,000	£10,000	£5,000	-
-Signing under seal	Board or delegated officer	As delegated by Board	As delegated by Board	-	-	-	-
-Specified orders within overarching approved contract	UWAB or F'cast	UWAB or F'cast	UWAB or F'cast	UWAB or F'cast	£30,000	£2,000	£2,000
-Invoice approval	UWAB or F'cast	UWAB or F'cast	UWAB or F'cast	UWAB or F'cast	£30,000	£2,000	£2,000
-Valuation certificate (including final certification)	UWAB or F'cast	UWAB or F'cast	UWAB or F'cast	UWAB or F'cast	£30,000	£2,000	-
-Contract variation	UWAB or F'cast	£30,000	£15,000	£10,000	£5,000	-	-
<b>3. Expense Claim Authorisation</b>							
	UWAB or F'cast	£2,000	£1,000	£2,000	£1,000	£500	-
<b>4. Settlement Agreements</b>							
	-	£25,000+	£25,000	£5,000	-	-	-
<b>UWAB = Unlimited within Board approved budget</b>							