

SOUTH CUMBRIA MULTI-ACADEMY TRUST

Finance, Resources & Governance Policy

Produced by: Gareth Preen ACMA | NPQEL | Assoc CIPD | ISBL
Chief Operations and Finance Officer (COFO)

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TITLE: Finance, Resources & Governance Policy (includes Scheme of Delegation, Charging and Remissions Policy, Pay Policies)

Prologue / Introduction

This Finance, Resources, Risk, Charging & Remissions Policy sets out how South Cumbria Multi-Academy Trust (SCMAT) manages its finances, resources, and governance processes in line with the **Academy Trust Handbook 2025 (ATH)**, the **Academies Accounts Direction**, the **Funding Agreement**, the **Companies Act 2006**, the **Charities Act 2011**, the **Charities SORP**, and all other relevant UK legislation, statutory guidance, and HM Treasury principles.

The policy applies to all staff, trustees, governors, and contractors with financial responsibilities or influence over Trust resources. It forms part of the Trust's wider financial governance framework, alongside the Scheme of Delegation, and is supported by related policies including **Whistleblowing, Pay, Procurement, and Business Continuity**.

Regulatory Framework

As a publicly funded academy trust, SCMAT must demonstrate the **proper, transparent, and effective use of public money**. This requires compliance with the principles of **regularity, propriety, value for money, and feasibility**, as set out in the **Academy Trust Handbook 2025 (sections 1.32 and 6.9)** and **Managing Public Money**.

The Trust must also comply with:

- The **Academies Accounts Direction** and annual reporting requirements.
- The **Charities Act 2011** and **Charities SORP** for charity accounting and reporting.
- **HMRC obligations**, including PAYE, VAT126 reclaims, and Corporation Tax (where applicable).
- The **Procurement Act 2023** for purchasing and contracting.
- All relevant education, safeguarding, health and safety, and data protection legislation.
- The **Nolan Principles of Public Life**: selflessness, integrity, objectivity, accountability, openness, honesty, and leadership.
- The Trust's Scheme of Delegation, which defines roles, responsibilities, and decision-making authority across Members, Trustees, Committees, and Executives.

Key Principles

- Spending decisions must be made in the **best interests of pupils** and in line with the Trust's strategic priorities.
- **Segregation of duties** and proper **authorisation** are required for all financial transactions.
- **Transparency, accountability, and auditability** underpin all processes.
- Both **internal scrutiny** and **external audit** provide assurance of compliance and performance.
- **Zero tolerance** applies to fraud, theft, corruption, or misuse of Trust resources.

- Compliance with the **Academy Trust Handbook, Scheme of Delegation**, legislation, and any relevant regulatory directions (DfE successor functions, HMRC, Charity Commission) is mandatory.

User Guidance

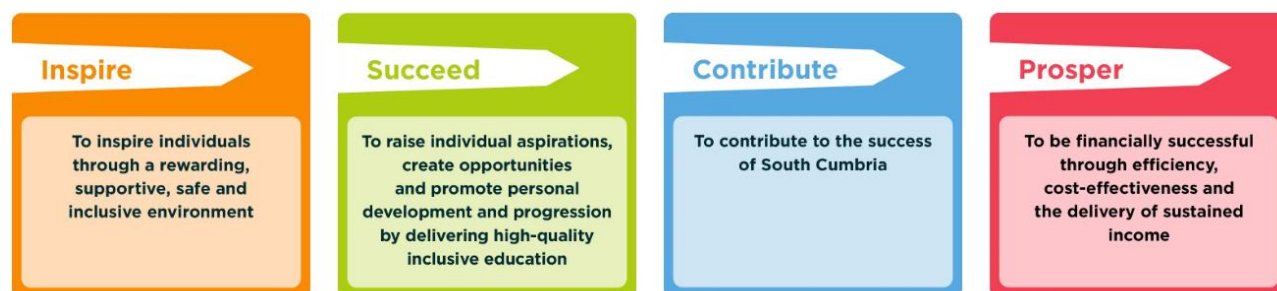
This policy is designed as both a **compliance manual** and a **practical guide**. Sections follow the financial cycle: planning and budgeting, purchasing and income, monitoring and reporting, and record-keeping.

Within this document there will be references to the CEO (Chief Executive Officer) and CFO (Chief Finance Officer). The CEO is the Accounting Officer (AO) and the CFO role, as per the Academies Handbook ATH the Chief Operations and Finance Officer (COFO) is the CFO but will be referred to as CFO in this document.

If you are involved in financial activity:

- **Know your delegated limits** — see the Scheme of Delegation and authorisation tables.
- **Keep evidence** — all receipts, approvals, contracts, and records should be stored securely.
- **Ask before committing** — if unsure whether an action is permitted, seek advice from the Chief Finance Officer (CFO).
- **Report concerns** — use the Whistleblowing Policy or notify the CFO/CEO if you suspect irregularity.

Supremacy of Regulation: *Where any regulatory requirement or statutory duty conflicts with this policy, the **regulatory requirement takes precedence**. Staff must immediately escalate such matters to the CFO and/or CEO, who will refer to the MAT Board for resolution and ensure compliance is maintained.*



Amendments / Updates

Date	Section	Update

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1. Policy Purpose

- 1.1. The purpose of this policy is to ensure that South Cumbria Multi-Academy Trust (SCMAT) maintains and develops robust systems of financial control that fully comply with the Academy Trust Handbook 2025 (ATH) and other relevant statutory requirements. These systems must uphold the principles of regularity, propriety, value for money, and feasibility (ATH section 1.32) and are essential for meeting the Trust's legal and contractual obligations under its Funding Agreement with the Secretary of State for Education.
- 1.2. The Trust will operate in accordance with:
 - 1.2.1. The requirements set out in the Academy Trust Handbook 2025
 - 1.2.2. The Academies Accounts Direction
 - 1.2.3. The Funding Agreement
 - 1.2.4. Companies Act 2006 and Charities SORP
 - 1.2.5. HM Treasury's Managing Public Money
 - 1.2.6. The Trust's Scheme of Delegation, which sets out the allocation of responsibilities and decision-making authority across Members, Trustees, Committees, and executive leaders
 - 1.2.7. All other relevant legislation and statutory guidance.
- 1.3. This policy forms part of the Trust's financial governance framework and provides the core procedures for operating the Trust's accounting and internal control systems. It must be read alongside the Scheme of Delegation and followed by all staff with financial responsibilities.
- 1.4. All staff involved in financial processes will receive appropriate and ongoing training to ensure competence in their roles. Accurate, complete, and timely records will be maintained in line with statutory requirements and internal reporting procedures.
- 1.5. The allocation of financial duties will be documented to ensure segregation of duties and prevent conflicts of interest. Authorised signatories and deputies to cover periods of absence will be recorded and reviewed annually.
- 1.6. All staff must be familiar with the Trust's Whistleblowing Policy and understand the procedure for reporting concerns relating to malpractice, fraud, corruption, or other wrongdoing. Any suspected financial irregularity will be reported immediately in line with this policy and the Academy Trust Handbook (ATH section 6.10), and, where required, to the Department for Education.
- 1.7. The MAT Board, or a nominated committee such as the Finance, Audit and Risk Assurance Committee (FARA), will review all financial controls and procedures at least annually. This review will be supported by a formal school resource management self-assessment checklist (ATH section 6.6) and any other relevant DfE compliance requirements.
- 1.8. Compliance with this policy is mandatory for all relevant staff. Any breach or deviation from its requirements must be reported to the Chief Finance Officer (CFO) without delay. The CFO will determine appropriate remedial action and, if necessary, escalate the matter to the Chief Executive Officer (CEO) in their role as Accounting Officer and/or the MAT Board.

2. Scheme of Delegation

2.1. Purpose

2.1.1. This Scheme of Delegation sets out how governance, financial, operational, and educational decision-making responsibilities are delegated across South Cumbria Multi-Academy Trust (SCMAT). It ensures clear accountability in line with the Academy Trust Handbook 2025, the Funding Agreement, and the Finance, Resources, Risk, Charging & Remissions Policy.

2.2. Delegated Authority Table

Area of Responsibility	Members	Trust Board (Trustees)	FARA Committee	CEO (AO)	CFO	Headteachers	Financial Controller	Budget Holders
Strategic Oversight	Approve Articles of Association. Appoint/remove Trustees.	Approve overall Trust strategy. Ensure compliance with Funding Agreement, ATH and Companies Act.	Monitor finance, audit, risk and assurance on behalf of Board.	Implement Trust strategy.	Advise CEO/Board.	Implement school plans.	N/A	N/A
Annual Budget	N/A	Approve Trust consolidated budget. Submit to DfE by 31 Aug.	Initial review and recommendation to Board.	Draft budget with CFO.	Prepare detailed budget.	Input school-level budget.	Support CFO.	N/A
Management Accounts	Receive published annual accounts.	Monitor in-year financial performance. Approve corrective actions.	Review monthly management accounts, variances, risk reports.	Provide assurance to Board.	Produce monthly management accounts.	Monitor school budgets.	Support CFO in reconciliations.	Monitor delegated lines.
Purchasing & Contracts	N/A	Authorise >£50k or novel/contentious in line with ATH. Approve procurement strategy.	Authorise >£50k contracts/tenders. Monitor procurement compliance.	Authorise £10k–£50k (with CFO).	Authorise up to £20k. Approve suppliers.	Authorise up to £2k.	Authorise up to £2k.	Request POs within budget.
Payroll & HR Costs	N/A	Approve staffing structure & leadership posts.	Monitor payroll controls.	Authorise senior leadership appointments.	Authorise staff appointments within budget.	Appoint school staff (within budget).	Process payroll data.	Submit claims/overtime forms.
Banking & Payments	N/A	Appoint bankers. Approve treasury/investment strategy.	Review cash flow/risk.	Authorise routine and non routine BACS, manage investments.	Authorise routine BACS, manage investments.	Sign cheques up to £2k.	Sign cheques up to £2k.	N/A

Debt Write-Offs	N/A	>£1,000 with FARA recommendation.	Recommend write-offs >£1,000.	N/A	Write-off ≤£1,000.	N/A	N/A	N/A
Severance/Settlement Payments	N/A	>£50k or where DfE approval required.	Review audit of severance.	Approve settlements <£50k in line with legal advice.	Support CEO.	N/A	N/A	N/A
Risk & Audit	N/A	Maintain risk register oversight. Approve risk strategy.	Monitor and escalate key risks. Commission internal scrutiny.	Maintain risk register.	Ensure financial risks controlled.	Identify school-level risks.	Provide financial data for scrutiny.	Raise local operational risks.
Whistleblowing /Fraud	N/A	Oversight of fraud response.	Review whistleblowing cases.	Ensure concerns are investigated.	Report financial irregularities.	Report concerns to CEO/CFO	Report anomalies	Report anomalies.

2.3. Expanded RACI Matrix – Governance, Finance & Educational Standards

R (Responsible); A (Accountable); C (Consult); I (Inform)

Activity / Decision	Members	Trust Board	FARA Committee	CEO (AO)	CFO	Headteachers	Local Governing Body	Financial Controller	Budget Holders
Appointment / removal of Members or Trustees	A	C	I	I	I	I	I	I	I
Appointment of Local Governors	I	I	I	A	I	C	R	I	I
Appointment / removal of CEO (AO)	I	A	C	n/a	I	I	I	I	I
Appointment / removal of CFO	I	A	C	R	n/a	I	I	I	I
Appointment / removal of Headteachers	I	A	C	R	C	n/a	I	I	I
Appointment of other staff (within budget)	I	I	I	C	C	A	C	I	I
Appointment of other staff (without budget)	I	I	I	A	C	R	C	I	I
Approve Trust strategy & improvement plan	I	A	C	R	C	C	C	I	I
Educational standards – monitoring outcomes	I	A	C	A	I	R	R	I	I
Safeguarding oversight	I	A	C	R (Trust DSL lead)	I	R (school DSLs)	R	I	I

Curriculum strategy	I	A	C	R	I	R (school-level)	R (school-level)	I	I
SEND and Inclusion oversight	I	A	C	R	I	R	R	I	I
Procurement strategy	I	A	C	C	R	C	I	I	I
Purchase authorisation > £50k	I	A	R	C	C	I	I	I	I
Purchase authorisation £20k-£50k	I	I	C	A	C	I	I	I	R (initiate request)
Purchase authorisation ≤ £20k	I	I	I	A	R	R (≤£2k)	I	C (≤£2k)	R (initiate request)
Staffing structure approval	I	A	C	R	C	C	C	I	I
Payroll processing	I	I	I	A	R (Approval)	R (School Oversight)	I	R (Processing)	I
Bank account opening / treasury	I	A	C	R	R	I	I	I	I
Bank payments	I	I	I	A (non routine)	A (routine)	C (≤£2k)	I	C (≤£2k)	I
Debt write-off ≤ £1,000	I	A	I	I	R	I	I	I	I
Debt write-off > £1,000	I	A	R	I	C	I	I	I	I
Severance / settlement < £50k	I	I	I	A	C	I	I	I	I
Severance / settlement ≥ £50k or DfE approval required	I	A	C	R	C	I	I	I	I
Risk register oversight	I	A	R	A	R (finance risks)	R (school-level)	I	C	I
Internal scrutiny programme	I	A	R	C	R	I	I	I	I
Fraud / whistleblowing oversight	I	A	R	A	R	R (report to CEO/CFO)	I	R (report anomalies)	R (report anomalies)
Approve school improvement priorities (SEF/SIP)	I	A	C	R	I	R	C	I	I
Monitor pupil outcomes & progress	I	A	C	A	I	R	R	I	I
Approve exclusions policy	I	A	C	R	I	R	C	I	I
Exclusion decisions (individual pupils)	I	I	I	C	I	A (HT decision, subject to appeal)	R	I	I
Complaints (final stage hearing)	I	A	C	R	I	C	R (School)	I	I
Health & Safety policy approval	I	A	R	R (Trust implementation)	C	R (school implementation)	I	I	I

Premises strategy & capital plans	I	A	C	R	R	C	I	I	I
ICT / Data strategy	I	A	C	R	C	C (school-level)	I	I	I
GDPR compliance / Data Protection Officer reports	I	A	C	R (SIRO)	C	R (school data champions)	C	I	I

2.4. Key Notes

- 2.4.1. Delegated limits are absolute ceilings – lower thresholds may be applied locally.
- 2.4.2. Novel, contentious or repercussive matters must always be referred to the Trust Board and, where required, to the DfE.
- 2.4.3. Segregation of duties must be maintained in all financial processes, where this is not possible it must be escalated to FARA.
- 2.4.4. This document replaces all previous Schemes of Delegation.

3. Organisation and responsibility

- 3.1. Overview:** The Trust has clearly defined the responsibilities of each governance tier, executive leader, and operational role involved in financial administration. This ensures:
- 3.1.1. Clarity of accountability and segregation of duties (ATH section 1.36–1.41).
 - 3.1.2. Avoidance of duplication or omission of functions.
 - 3.1.3. A robust framework for financial control, decision-making, and reporting in compliance with the **Academy Trust Handbook 2025**, the **Funding Agreement**, and all relevant legislation.

3.2. Members

- 3.2.1. The Trust will have a minimum of **three members** (ATH 1.3), though a higher number is recommended to ensure robust oversight.
- 3.2.2. Members:
 - 3.2.2.1. Maintain strategic oversight of the MAT and the effectiveness of its governance arrangements.
 - 3.2.2.2. Receive the audited accounts annually (ATH 1.7).
 - 3.2.2.3. Ensure the Board is exercising effective financial and strategic control.
 - 3.2.2.4. Are detailed in the Trust’s Funding Agreement, Articles of Association, and Scheme of Delegation.

3.3. MAT Board (Trustees)

- 3.3.1. The MAT Board has ultimate responsibility for the proper stewardship of the Trust’s finances (ATH 1.10).
Key duties include:
- 3.3.2. Ensuring that funds from the **DfE** are used only for the purposes intended.
 - 3.3.2.1. Approving the Trust’s annual budget.
 - 3.3.2.2. Appointing the CEO (ex-officio trustee), the Accounting Officer (AO), and the CFO (in conjunction with the CEO).
 - 3.3.2.3. Approving the appointment of Headteachers in conjunction with the CEO.
- 3.3.3. Additional responsibilities:
 - 3.3.3.1. Reviewing and authorising the annual budget before submission to the DfE.
 - 3.3.3.2. Monitoring income and expenditure against the approved budget.
 - 3.3.3.3. Overseeing compliance with the **Companies Act 2006** and the **Academies Accounts Direction** in the production of the annual accounts.
 - 3.3.3.4. Approving changes to the structure and personnel of the senior leadership team.
- 3.3.4. Delegation to **Finance, Audit and Risk Assurance Committee (FARA)** includes:
 - 3.3.4.1. Advising on governance, risk, internal control, and value for money systems.
 - 3.3.4.2. Reviewing audited financial statements and recommending approval to the Board before 31 December each year.
 - 3.3.4.3. Overseeing the appointment and independence of the external and internal auditors (ATH section 3.19–3.20).
 - 3.3.4.4. Approving the internal scrutiny programme based on key risks (ATH section 3.23–3.24).
 - 3.3.4.5. Monitoring progress on audit recommendations.
 - 3.3.4.6. Reviewing the Whistleblowing Policy and ensuring allegations of fraud or irregularity are handled appropriately.
 - 3.3.4.7. Authorising orders above £50,000, in line with the Scheme of Delegation.

3.4. Chief Executive Officer (CEO)

- 3.4.1. The CEO has overall executive responsibility for the Trust’s operations, including financial activities, within the framework set by the Board.
- 3.4.2. The CEO is the **Accounting Officer (AO)** under the ATH and is personally accountable to Parliament and the DfE for the regularity, propriety, and value for money in the use of public funds.
- 3.4.3. Key responsibilities include:

- 3.4.3.1. Assuring the Board of compliance with the Funding Agreement and ATH.
- 3.4.3.2. Safeguarding assets and ensuring appropriate controls exist to prevent loss or misuse.
- 3.4.3.3. Signing the Governance Statement in the audited accounts.
- 3.4.3.4. Advising the Board in writing where proposed action breaches the Funding Agreement, ATH, or Articles of Association.
- 3.4.3.5. Ensuring bank accounts, financial statements, and records are operated by more than one person.
- 3.4.3.6. Approving staff appointments within the authorised staffing structure (except senior posts reserved to the Board).
- 3.4.3.7. Authorising orders/contracts between £10,000 and £50,000 (with the CFO).

3.5. Chief Finance Officer (CFO)

- 3.5.1. The CFO works closely with the CEO and reports to the MAT Board. The CFO is the Trust's named **Chief Finance Officer** under the ATH (1.39–1.41).
- 3.5.2. At SCMAT the nominated **CFO**, as per the ATH, is the **Chief Finance and Operations Officer**, however for the purposes of this policy will be referred to as CFO.
- 3.5.3. Key responsibilities:
 - 3.5.3.1. Day-to-day management of financial operations and accounting systems.
 - 3.5.3.2. Strategic and operational financial planning and management.
 - 3.5.3.3. Maintenance of effective systems of internal control.
 - 3.5.3.4. Preparation of monthly management accounts and year-end statutory accounts.
 - 3.5.3.5. Authorising transactions up to £20,000 with budget holders.
 - 3.5.3.6. Managing capital expenditure plans and projects.
 - 3.5.3.7. Overseeing internal scrutiny reports and supplier approval.
 - 3.5.3.8. Ensuring all financial returns are submitted to the DfE within deadlines.

3.6. Headteachers

- 3.6.1. Authorise transactions up to £2,000 with budget holders.
- 3.6.2. Manage delegated school budgets in conjunction with the CFO.
- 3.6.3. Approve staff appointments within budgeted posts.
- 3.6.4. Ensure expenditure is within approved funding.

3.7. Financial Controller

- 3.7.1. Deputises for CFO as required.
- 3.7.2. Authorises transactions up to £2,000.
- 3.7.3. Authorises overtime and staff expenses.
- 3.7.4. Performs reconciliations and circulates monthly payroll reports.

3.8. Central Finance Team

- 3.8.1. Provides accounts payable, receivable, reconciliation, and procurement services.
- 3.8.2. Supports budget monitoring and assurance checks.
- 3.8.3. Leads on aligning and rationalising Trust-wide contracts for finance, estates, ICT, and HR.

3.9. Company Secretary

- 3.9.1. Maintains statutory registers under the **Companies Act 2006**.
- 3.9.2. Ensures timely Companies House filings (within 15 days of changes).
- 3.9.3. Oversees maintenance of minutes and formal company records.
- 3.9.4. The company secretary role may be undertaken by a range of officers or external agencies.

3.10. Assurance Officer

- 3.10.1. Provides independent oversight of financial controls (ATH section 3.21–3.24).
- 3.10.2. Undertakes termly reviews of compliance and presents reports to CFO and the Board.

3.11. Other Staff

- 3.11.1. Responsible for securing Trust property, preventing waste, and following financial procedures.
- 3.11.2. Budget holders are accountable for expenditure within approved budgets.

3.12. Register of Interests

- 3.12.1. Maintained by the Company Secretary (ATH section 5.46–5.47).
- 3.12.2. Updated annually with declarations from trustees and staff with financial authority.
- 3.12.3. Covers direct and indirect business interests of individuals and their close family members.

4. Accounting system

4.1. Data Control

- 4.1.1. The Trust complies with the **Data Protection Act 2018** and the **UK General Data Protection Regulation (UK GDPR)** in the processing and storage of financial data. The Trust is registered with the Information Commissioner's Office (ICO) and renews this registration annually.
- 4.1.2. The named **Data Controller** for the Trust is the **Chief Executive Officer (CEO)**, who is responsible for ensuring that personal and financial data is processed lawfully, stored securely, and retained in line with statutory requirements.
- 4.1.3. All financial transactions of the Trust must be recorded in the **Sage Intacct** accounting system, which is cloud-hosted and managed under the direction of the Chief Finance Officer (CFO) and the Financial Controller.
- 4.1.4. Financial records will be retained for a **minimum of six years** from the end of the financial year to which they relate, in compliance with **HMRC** requirements and the **Academy Trust Handbook 2025 (ATH 2.36)**.

4.2. System Access

- 4.2.1. Access to the Sage Intacct accounting system is restricted to authorised staff only. Access permissions are controlled by the CFO in line with **ATH section 1.36** requirements on internal control.
- 4.2.2. Each user will have a unique login and password. Sharing of logins or passwords is prohibited.
- 4.2.3. User access levels will be reviewed at least annually, or when there is a change in staff responsibilities, to ensure they remain appropriate.

4.3. Back-Up and Disaster Recovery

- 4.3.1. Sage Intacct is cloud-based, and automated daily backups are performed by Sage, with additional ad-hoc backups available if required.
- 4.3.2. The Trust will maintain a **Finance Business Continuity and Disaster Recovery Plan**, aligned with its overarching Business Continuity Plan, to ensure financial operations can continue in the event of a system failure, data loss, or cyber incident (**ATH 6.9**).
- 4.3.3. The MAT Board (or delegated committee) will review financial systems resilience annually as part of its risk management processes (**ATH section 6.6**).

4.4. Transaction Processing

4.4.1. Journals

- 4.4.1.1. All journal entries must be authorised in accordance with this policy's delegated authority levels. Only the Financial Controller, or the CFO in their absence, may authorise journals.
- 4.4.1.2. Each journal entry must include:
 - 4.4.1.2.1. A clear narrative explaining the purpose of the entry.
 - 4.4.1.2.2. Supporting documentation to be available where appropriate.

4.4.2. Transaction Reports

- 4.4.2.1. The CFO will obtain and review periodic system reports to ensure that only legitimate transactions are recorded in the accounting system. This includes:
 - 4.4.2.1.1. Payroll reports.
 - 4.4.2.1.2. Management accounts summarising income and expenditure against budget at budget-holder level.
- 4.4.2.2. These reports will be made available to the CEO, Headteachers, and relevant budget holders as required.

4.4.3. Reconciliations

- 4.4.3.1. The Financial Controller will ensure that the following reconciliations are completed monthly, with reconciling items investigated and cleared promptly:
 - 4.4.3.1.1. Control Accounts.
 - 4.4.3.1.2. Sales Ledger Control (Debtor Control).

- 4.4.3.1.3. Purchase Ledger Control (Creditor Control).
- 4.4.3.1.4. PAYE and Pensions Control.
- 4.4.3.1.5. VAT Control.
- 4.4.3.1.6. Suspense Control.
- 4.4.3.1.7. Petty Cash.
- 4.4.3.1.8. Bank Accounts.
- 4.4.3.2. Reconciliations may be delegated to finance assistants or school administrators but remain the responsibility of the Financial Controller.
- 4.4.3.3. A reconciliation schedule with deadlines will be maintained and monitored by the Financial Controller.
- 4.4.3.4. Unusual, significant, or long-standing unreconciled items must be reported to the CFO without delay.

5. Financial planning, monitoring and budgeting

5.1. Overview

- 5.1.1. The Trust prepares both **medium-term** (three-year) and **short-term** (annual) financial plans in line with the **Academy Trust Handbook 2025** (ATH sections 2.8–2.17).
- 5.1.2. Financial planning is integrated with the Trust's strategic and educational development planning to ensure that objectives are delivered within the resources available.

5.2. Medium-Term Financial Plan

- 5.2.1. The medium-term financial plan is developed as part of the Trust's strategic planning process. It outlines how the Trust will achieve its educational and operational objectives over the next three years within the expected level of resources.
- 5.2.2. The plan is informed by:
 - 5.2.2.1. Projected pupil numbers and corresponding DfE funding.
 - 5.2.2.2. Long-term staffing and curriculum planning.
 - 5.2.2.3. Capital investment needs.
 - 5.2.2.4. Forecast inflationary pressures and other external cost drivers.
 - 5.2.2.5. The Trust's reserves policy and sustainability targets.

5.3. Annual Budget

- 5.3.1. The annual budget translates the medium-term plan into a detailed statement of the expected resources available for the year and how they will be allocated.
- 5.3.2. The **CEO** (as Accounting Officer) is responsible to the MAT Board for preparing a balanced annual budget. The **CFO** prepares the detailed draft budget with input from Headteachers and the Leadership Team.
- 5.3.3. The budget planning process includes:
 - 5.3.3.1. Forecasting pupil numbers to estimate DfE General Annual Grant (GAG) income.
 - 5.3.3.2. Reviewing other income sources (lettings, trading, grants, donations).
 - 5.3.3.3. Analysing historical spend to understand cost drivers.
 - 5.3.3.4. Identifying potential efficiency savings.
 - 5.3.3.5. Assessing planned expenditure against strategic priorities.
 - 5.3.3.6. Liaising with major suppliers and stakeholders where required.
- 5.3.4. The draft budget should clearly link to the Trust's strategic objectives and development plan.
- 5.3.5. The MAT Board will review, amend if necessary, and approve the budget before submission to the DfE by **31 August** each year (ATH 2.16).
- 5.3.6. The CFO will review the budget in August and September to incorporate actual staffing and pupil admission data. The revised working budget will be presented to the Board for approval as the operational budget for the year.

5.4. Balancing the Budget

- 5.4.1. Estimated income and expenditure will be compared to identify potential surpluses or deficits.
- 5.4.2. Where a deficit is projected, the Trust will:
 - 5.4.2.1. Explore opportunities to increase income.
 - 5.4.2.2. Identify and implement efficiency savings.
 - 5.4.2.3. Defer or reprioritise projects until funding permits.
- 5.4.3. Where a surplus is projected, this may be held as contingency in line with the **Reserves Policy** or allocated to strategic investment.

5.5. Budget Approval and Communication

- 5.5.1. The CFO will present the final draft budget to the MAT Board for formal approval.
- 5.5.2. Once approved, the budget will be:
 - 5.5.2.1. Submitted to the DfE by 31 August.

- 5.5.2.2. Communicated to all budget holders with relevant detail on their allocations and financial responsibilities.
- 5.5.3. The budget will be accompanied by a statement of assumptions and priorities to enable effective decision-making if circumstances change.

5.6. Budget Monitoring and Review

- 5.6.1. The CFO will prepare monthly budget monitoring reports showing:
 - 5.6.1.1. Actual income and expenditure against budget.
 - 5.6.1.2. Variances with explanations.
 - 5.6.1.3. Forecast outturn for the year.
- 5.6.2. Monitoring reports will be:
 - 5.6.2.1. Provided to the CEO, Headteachers, and MAT Board.
 - 5.6.2.2. Presented to the MAT Board at least three times per year (ATH 2.18).
 - 5.6.2.3. Included in Headteachers' reports to Local Governing Bodies.
- 5.6.3. Any projected overspend must be discussed with the CFO in the first instance.
- 5.6.4. Virements:
 - 5.6.4.1. All cross-Trust virements require CEO or CFO authorisation.
 - 5.6.4.2. Headteachers may authorise virements within their own school budget allocations.
- 5.6.5. The budget will be treated as a **living document** and updated if material changes in funding or costs occur.

6. **Payroll**

6.1. **Overview**

6.1.1. The payroll system consists of three main elements:

6.1.1.1. Staff appointments.

6.1.1.2. Payroll administration.

6.1.1.3. Payments.

6.1.2. All payroll activities must comply with the **Academy Trust Handbook 2025**, HMRC requirements, the **Pensions Act 2008**, and the Trust's Pay Policy. Internal controls will be applied at each stage to safeguard public funds and prevent fraud (ATH section 6.9).

6.2. **Staff Appointments**

6.2.1. The MAT Board approves the Trust's staffing structure. Changes to the **Leadership Structure** require prior Board approval, ensuring adequate budget provision exists.

6.2.2. The CEO, CFO, and Headteachers may appoint staff and make contractual changes only where posts are approved and budgeted (including supply), except leadership positions, which require consultation with the Board.

6.2.3. Headteachers will normally appoint staff within their own school.

6.2.4. All personnel records to be held securely on **Arbor** (the Trust's MIS) in compliance with the **Data Protection Act 2018** and **UK GDPR**. Any staffing changes must be notified in writing to the CFO and Financial Controller immediately to update budget forecasts.

6.2.5. The CEO is accountable for Pay Policies; Headteachers are responsible for implementing them.

6.2.6. Headteachers must ensure compliance with the Trust's **Safer Recruitment Policy**, including statutory pre-employment checks and accurate personnel records.

6.3. **Payroll Administration**

6.3.1. The Trust's payroll is administered by **Capita**.

6.3.2. All staff are paid monthly. A master payroll record is maintained for each employee, including:

6.3.2.1. Salary.

6.3.2.2. Bank account details.

6.3.2.3. Taxation status.

6.3.2.4. Personal details.

6.3.2.5. Any deductions or allowances.

6.3.3. All changes to payroll data (appointments, resignations, pay changes, overtime) must be made on an appropriate **Pay & Employment Notification Form**.

6.3.4. All supply, casual, overtime, and travel claims must be authorised in line with the authorisation matrix below:

Claimant	Authoriser
Trustees / Governors Claims	CEO/CFO
CEO	CFO
HT	CEO/CFO/Financial Controller
CFO	CEO/HT/Financial Controller
Financial Controller	CEO/CFO
DHT/AHT	CEO/HT/CFO/Financial Controller
Teachers	HT / CEO
Teaching Assistants	HT / CEO
Support Staff	HT/CFO/Financial Controller

6.3.5. Monthly staff absence records to be authorised by the Headteacher and sent to the payroll provider.

6.3.6. Use of agency staff or overtime need to be supported by available budget or a confirmed alternative funding source.

6.4. Payments

6.4.1. All salary payments are made by **BACS**.

6.4.2. The payroll provider will pay relevant third parties directly, including:

6.4.2.1. Teachers' Pension Scheme.

6.4.2.2. Local Government Pension Scheme.

6.4.2.3. HMRC.

6.4.2.4. Salary sacrifice schemes.

6.4.2.5. Trade unions.

6.4.3. Deductions are calculated in compliance with current legislation (Income Tax, National Insurance, pensions). These are summarised in Sage Intacct payroll reports.

6.4.4. Headteachers should review monthly payroll reports to ensure that transactions (including supply, casual staff, absences, and overtime) match authorised claim forms.

6.4.5. The Financial Controller will reconcile actual monthly payroll expenditure to the budget. Variances will be investigated immediately and queries raised with the payroll provider.

6.4.6. All payroll-related payments to third parties must be authorised by the CFO or another authorised signatory by the statutory due date.

6.4.7. The CFO may conduct random checks of gross-to-net calculations to ensure system accuracy.

6.4.8. After payroll is processed, the nominal ledger will be updated. The Financial Controller will review the payroll control account each month to confirm correct postings to cost centres and investigate any suspense account entries.

7. **Severance/Settlement Payments**

7.1. **General Principles**

- 7.1.1. If the Trust is considering a severance or settlement payment **above contractual or statutory entitlement**, trustees must be satisfied that:
 - 7.1.1.1. The payment is in the best interests of the Trust.
 - 7.1.1.2. It is supported by a written legal assessment of the case.
 - 7.1.1.3. It represents value for money and proper stewardship of public funds (ATH section 5.71).
- 7.1.2. A legal assessment must consider the likelihood of the Trust successfully defending the case at an Employment Tribunal or in civil proceedings:
 - 7.1.2.1. If the assessment indicates it is **more likely than not** that the Trust would succeed, there is no financial rationale for a settlement.
 - 7.1.2.2. If the assessment indicates the Trust is **unlikely to succeed**, a settlement may be justified to avoid higher costs or reputational damage.
- 7.1.3. Any settlement amount must be **less than the likely award** an Employment Tribunal or court would make in the circumstances.

7.2. **Restrictions**

- 7.2.1. Severance payments must not be used as a **reward for failure**.
- 7.2.2. Payments in cases of **gross misconduct** will only be considered where legal advice confirms a high risk that a dismissal would be found procedurally unfair or unreasonable under employment law.
- 7.2.3. In cases of **poor performance**, a settlement may be considered if legal advice confirms:
 - 7.2.3.1. The cost and time of following formal capability procedures outweigh the settlement amount.
 - 7.2.3.2. There is a material risk of legal or tribunal claims.

7.3. **Governance and Control**

- 7.3.1. All decisions must be based on a careful appraisal of the facts and formal legal advice.
- 7.3.2. The CEO and Board should review whether the case indicates weaknesses in internal controls, HR processes, or management practice, and take corrective action where required.

7.4. **DfE Approval Requirements**

- 7.4.1. **DfE approval is required** before making any **non-statutory/non-contractual** severance or settlement payment of **£50,000 gross or more** (ATH 5.76).
- 7.4.2. Approval must be sought **before** any offer is made. The Trust should contact the DfE at the earliest opportunity.
- 7.4.3. **Examples:**
 - 7.4.3.1. £40k statutory/contractual + £49,999 non-contractual = **No approval required**.
 - 7.4.3.2. £80k statutory/contractual + £49,999 non-contractual = **No approval required**.
 - 7.4.3.3. £40k statutory/contractual + £50,000 non-contractual = **Approval required** (for the £50k enhancement).
 - 7.4.3.4. £80k statutory/contractual + £50,001 non-contractual = **Approval required** (for the £50,001 enhancement).
- 7.4.4. Any sanctions, restrictions, or regulatory notices in place from the DfE take precedence and must be adhered to before proceeding.

7.5. **Authorisation**

- 7.5.1. Settlement agreements will be authorised by the **CEO**, subject to:
 - 7.5.1.1. Compliance with this policy and ATH requirements.
 - 7.5.1.2. Prior Board approval for any payment requiring DfE authorisation.
 - 7.5.1.3. Availability of appropriate budget provision.

8. **Purchasing**

8.1. The Trust aims to achieve **best value** for all purchases, ensuring goods, services, and works are obtained in the right **quality, quantity, and timescale** at the most advantageous price, while meeting operational needs.

8.2. Public funds must be spent in accordance with the **principles of public procurement** (ATH 5.15):

8.2.1. **Probity** – No corruption, private gain, or conflicts of interest.

8.2.2. **Accountability** – The Trust is publicly accountable for all expenditure.

8.2.3. **Fairness** – All suppliers must be treated consistently and without discrimination.

8.3. Value for money must be considered in the **round**, taking into account:

8.3.1. Price.

8.3.2. Quality of goods or services.

8.3.3. Supplier track record and capacity.

8.3.4. Delivery timescales.

8.3.5. Whole-life costs.

8.3.6. Staff time needed to manage the procurement.

8.4. **Budget Control**

8.4.1. Budget holders will normally be notified of their annual allocation at least one month before the start of the academic year.

8.4.2. Budget holders are responsible for managing spend within their allocation and ensuring funds are not overspent.

8.4.3. Budget monitoring reports will be provided at least termly, with additional reports available on request.

8.5. **Ordering Process**

8.5.1. All orders should be raised **in advance** of goods or services being received and processed through the **Sage Intacct** system using the correct authorisation route.

8.5.2. Where orders are placed by phone or email, the purchase order reference issued by Sage Intacct should be quoted.

8.5.3. The Trust operates a **“No Official Order, No Payment”** policy, except for agreed exceptions (e.g., utilities, rent, regular direct debit payments).

8.6. **Thresholds and Competition Requirements**

8.6.1. Procurement thresholds are aligned to the **Procurement Act 2023** and **ATH section 5.19**:

Value (Excluding VAT)	Process Required	Approval Route
< £2,000	Best value judgement – at least one verbal/written quote recommended	Budget Holder / HT
£2,000 – £20,000	Minimum 2 written quotes	CFO
£20,000 – £50,000	Minimum 3 written quotes	CEO
£50,000 – UK Threshold	Formal tender process or compliant public sector framework	Directors
At or above UK Threshold*	Public procurement process compliant with Procurement Act 2023	Directors

8.7. **Use of Framework Agreements**

8.7.1. The Trust may use government-approved or public sector framework agreements without further competition, provided the framework was procured in compliance with the Procurement Act 2023.

8.7.2. This can be applied up to the UK threshold, or above if the framework allows.

8.8. Exceptions to Quotation Requirements

8.8.1. In certain circumstances, obtaining the required number of quotations may not be possible or practical, for example:

8.8.1.1. Urgent health and safety or security repairs.

8.8.1.2. Specialist or proprietary equipment.

8.8.1.3. Where contractual or licensing arrangements restrict competition.

8.8.2. In such cases, the CFO (or delegate) should approve the exception, and a written record of the justification should be retained.

8.9. Approval Limits

8.9.1. The following limits apply to all purchase orders:

>£50k Whole Trust [Directors]

<£50k Whole Trust [CEO]

<£20k Whole Trust [CFO]

<£2k Financial Controller

<£2k School [HT]

8.10. Delivery and Goods Receipt

8.10.1. The person requesting goods is responsible for making delivery arrangements.

8.10.2. Upon receipt, goods should be checked against the delivery note and purchase order, and any discrepancies reported immediately to the supplier and the central finance team.

8.10.3. Goods returned due to non-compliance with the order or substandard quality must be reported to the person triggering the order process who can manage the return.

8.11. Invoice Checking and Payment

8.11.1. School based administrators, or those ordering goods/services, will confirm in Sage Intacct that goods/services have been received.

8.11.2. All invoices must then be sent to the Central Finance Team at finance@scmat.org.uk for verification against:

8.11.2.1. Correct arithmetic.

8.11.2.2. Goods/services ordered.

8.11.2.3. Correct pricing.

8.11.3. Invoices are authorised for payment as follows:

8.11.3.1. Standard purchase orders: Financial Controller, CFO, or CEO.

8.11.3.2. No-order invoices: Financial Controller, CFO, CEO, or Headteacher.

8.11.4. Payments will be processed through Sage Intacct and made by BACS in line with agreed payment terms.

8.12. Record Keeping

8.12.1. All procurement documentation, including quotes, tenders, evaluation notes, and approvals, must be retained for at least **six years** in line with ATH 2.36.

9. Procurement and Purchasing: Tenders

9.1. Procurement within the Trust will follow the principles of the Procurement Act 2023 and associated guidance, ensuring transparency, fairness, non-discrimination, and value for money, while applying a proportionate approach to the size, scope, and risk of the contract.

9.2. The Trust may use a range of competitive procurement procedures, adapted to meet its needs, including:

9.2.1. **Open Competition** – any supplier may submit a tender.

9.2.2. **Selective/Restricted Competition** – only suppliers shortlisted after an initial selection stage are invited to tender.

9.2.3. **Direct Award or Negotiated Procedure** – a contract is awarded without a full competition in circumstances allowed by legislation or policy (e.g., extreme urgency, absence of competition, continuation with an existing supplier where justified).

9.3. The choice of procedure will be based on proportionality, the nature of the requirement, market conditions, and the resources available to run the process.

9.4. Open Competition

9.4.1. This is where all potential suppliers can submit a tender. It is generally the most transparent method and is often used where there is a competitive market and no need to restrict the field.

9.4.1.1. Advertising may be through Find a Tender (for contracts above relevant thresholds), Contracts Finder, the Trust's website, or trade publications.

9.4.1.2. The open procedure remains the default for larger value procurements unless there is a justifiable reason to use another approach.

9.5. Selective/Restricted Competition

9.5.1. This approach invites only a shortlist of suppliers to tender. It may be used where:

9.5.1.1. A large number of suppliers are likely to respond, and shortlisting will make the process more manageable.

9.5.1.2. Only suppliers meeting specific technical, quality, or capability criteria are likely to be suitable.

9.5.1.3. There is a need to balance administrative cost with contract value.

9.5.2. Shortlisting must be fair, transparent, and based on published selection criteria.

9.6. Direct Award / Negotiated Procedure

9.6.1. The Trust may award a contract directly, or negotiate with one or more suppliers, in the following circumstances permitted under the Procurement Act 2023:

9.6.1.1. Where competition is absent for technical reasons or due to exclusive rights.

9.6.1.2. Where extreme urgency (unforeseeable and not caused by the Trust) makes a competitive process impractical.

9.6.1.3. Where additional goods, works, or services are required from the existing supplier to ensure compatibility, continuity, or safe integration.

9.6.1.4. Where the total contract value falls below the relevant procurement thresholds and the Trust's own financial regulations allow.

9.7. Preparation for Tender

9.7.1. Before inviting tenders, the Trust will define:

9.7.1.1. The objective and scope of the requirement.

9.7.1.2. Essential and desirable specifications.

9.7.1.3. Technical and service expectations, including after-sales requirements.

9.7.1.4. Contract form, terms, and intended evaluation methodology.

9.7.2. A clear specification will reduce ambiguity and improve value for money outcomes.

9.8. Invitation to Tender

- 9.8.1. All invitations to tender, whether open or restricted, will include:
 - 9.8.1.1. Background and objectives.
 - 9.8.1.2. Technical requirements.
 - 9.8.1.3. Implementation timescales.
 - 9.8.1.4. Evaluation criteria and weighting.
 - 9.8.1.5. Terms and conditions.
 - 9.8.1.6. Submission instructions and deadline.

9.9. Evaluation and Award

- 9.9.1. Tenders will be evaluated against pre-published criteria, considering whole-life cost, quality, social value, and other relevant factors.
 - 9.9.1.1. Evaluation will normally be undertaken by at least two people.
 - 9.9.1.2. Conflicts of interest must be declared and managed.
 - 9.9.1.3. The most economically advantageous tender (MEAT) will normally be accepted, not necessarily the lowest price.
- 9.9.2. For contracts above £50,000, a summary evaluation report and recommendation will be presented to the FARA Committee for approval.
- 9.9.3. All unsuccessful suppliers will be notified, with feedback provided where appropriate.

9.10. Record Keeping

- 9.10.1. Full records will be kept for all procurements, including specifications, evaluation records, approvals, and communications with suppliers, in line with audit requirements.

10. Charge Cards

10.1. Purpose and Scope

- 10.1.1. The Trust may issue Business Charge Cards (including credit cards) to authorised employees to enable payment for goods and services where suppliers do not accept purchase orders or invoices, or where using standard procurement methods would be disproportionately costly, inefficient, or impractical (e.g., certain online transactions).
- 10.1.2. All use of charge cards must comply with:
 - 10.1.2.1. **Academy Trust Handbook 2025**, section 5.29.
 - 10.1.2.2. This policy's purchasing and procurement rules.
 - 10.1.2.3. HM Treasury principles of regularity, propriety, and value for money.

10.2. Authorisation and Budget Control

- 10.2.1. A charge card may only be used when:
 - 10.2.1.1. The expenditure has been **pre-authorised** by the relevant budget holder.
 - 10.2.1.2. There is **sufficient budget provision** available.
- 10.2.2. The **cardholder** and the **cost centre manager** are jointly responsible for ensuring all card transactions are legitimate, pre-approved, and compliant with Trust policy.

10.3. Transaction and Receipt Requirements

- 10.3.1. A VAT receipt (where applicable) must be obtained for every transaction.
- 10.3.2. All receipts should be submitted to the finance team within **five working days** of purchase, and no later than the end of the month in which the purchase was made.
- 10.3.3. Monthly card statements should be reconciled by the cardholder, authorised by the cost centre manager, and submitted to the finance team for review.
- 10.3.4. Purchases made by charge card must also be recorded on **Sage Intacct** in line with normal procurement processes (including evidence of approval and delivery).

10.4. Security and Usage Restrictions

- 10.4.1. The card should not be lent to another person or used by anyone other than the named cardholder.
- 10.4.2. The card PIN or security details should **never** be shared.
- 10.4.3. The card must **not** be used for personal expenditure under any circumstances.
- 10.4.4. By using the card all cardholders accept personal responsibility for transactions on a card issued in their name.

10.5. Settlement of Balances

- 10.5.1. The charge card balance must be settled **in full each month** by direct debit from the Trust's bank account. Any alternative arrangement would be considered borrowing and is prohibited without written approval from the Secretary of State for Education (ATH 5.29).

10.6. Repayment of Unauthorised Spend

- 10.6.1. Any unauthorised or non-compliant transactions will be repaid in full by the cardholder.
- 10.6.2. Where repayment is not made voluntarily, the Trust reserves the right to recover the amount by salary deduction at the next available payroll run.

10.7. Fuel Cards

- 10.7.1. The Trust may issue **Fuel Cards** for the purchase of fuel for Trust-owned or leased vehicles.
- 10.7.2. Fuel cards must only be used for legitimate business travel, with mileage logs and receipts retained for all transactions.

11. Supplier Manager

11.1. Purpose

11.1.1. The Trust will establish preferred supplier agreements wherever possible to achieve **best value**, which includes:

11.1.1.1. Preferential pricing and discounts through bulk purchasing.

11.1.1.2. High service and support standards.

11.1.1.3. Efficient ordering and invoicing processes.

11.1.2. Preferred supplier arrangements will be managed centrally by the CFO to ensure consistency, value for money, and compliance with the **Procurement Act 2023** and the **Academy Trust Handbook 2025**.

11.2. Areas of Focus

11.2.1. Preferred supplier arrangements will, where appropriate, cover (but are not limited to):

11.2.1.1. Supply staff and agency services.

11.2.1.2. Administrative and office items.

11.2.1.3. General educational consumables.

11.2.1.4. Building maintenance contractors (except where services are delivered under a PFI arrangement).

11.3. Supplier Records

11.3.1. Maintaining Supplier Details

11.3.1.1. All supplier records must be held in **Sage Intacct**.

11.3.1.2. Full details must be recorded for new suppliers, including:

11.3.1.2.1. Legal entity name (as registered with Companies House if applicable).

11.3.1.2.2. Company registration number (if applicable).

11.3.1.2.3. VAT registration number (if applicable).

11.3.1.2.4. Bank account name, sort code, and account number.

11.3.1.2.5. Remittance advice email address.

11.3.1.2.6. Preferred payment method and terms.

11.3.1.2.7. Supporting documentation must be obtained from the supplier confirming these details.

11.3.2. Compliance Documentation

11.3.2.1. Where applicable, suppliers should also provide:

11.3.2.1.1. Evidence of relevant insurance cover.

11.3.2.1.2. Risk assessments (for on-site work).

11.3.2.1.3. Enhanced DBS checks (for work involving contact with pupils).

11.4. New Supplier Setup

11.4.1. Requests for new suppliers must be authorised in writing by the **Financial Controller** or **CFO**.

11.4.2. New supplier checks will be carried out by a member of the central finance team and must include:

11.4.2.1. Verification of company registration (if applicable).

11.4.2.2. Confirmation of bank account details directly from the supplier via secure communication.

11.4.2.3. Review of any compliance documents required.

11.5. Bank Detail Changes

11.5.1. Any notification of a change to supplier bank details must be verified before payment.

11.5.2. Verification must be completed by **calling the supplier using the contact number already held on file in Sage Intacct** (not from the change request).

11.5.3. No payments will be made to a new account until verification has been completed and documented.

12. Other Staff Costs / Processes

12.1. Welfare

- 12.1.1. The Trust recognises that staff welfare extends beyond salary and benefits, and therefore allocates an annual welfare budget to be managed by the CEO and CFO in consultation with Headteachers.
- 12.1.2. The welfare budget may be used for items or activities directly benefiting staff, with the aim of:
 - 12.1.2.1. Supporting staff retention.
 - 12.1.2.2. Enhancing morale and motivation.
 - 12.1.2.3. Demonstrating the Trust's commitment to staff wellbeing.
- 12.1.3. All welfare expenditure must:
 - 12.1.3.1. Provide demonstrable value and benefit to staff.
 - 12.1.3.2. Be reasonable, proportionate, and capable of withstanding external scrutiny.
 - 12.1.3.3. Comply with the **Academy Trust Handbook 2025** and any relevant HMRC guidance.
- 12.1.4. Normally, welfare-related expenditure will not exceed **£200 per individual** per occasion and will be funded from unrestricted income unless otherwise agreed by the Board.

12.2. Gifts and Awards

- 12.2.1. The Trust may present awards to staff for long service or exceptional dedication.
- 12.2.2. Awards will not be cash and will follow **HMRC's tax guidance on trivial benefits**.
- 12.2.3. Awards will normally not exceed **£200 in value** and will be funded from unrestricted income. There must be available budget to undertake this.
- 12.2.4. The CFO must be consulted before any such award is made to ensure compliance with tax and funding rules.

12.3. Staff Collections

- 12.3.1. Where staff arrange collections for personal occasions (e.g., birthdays, anniversaries), such funds may be banked as **unrestricted income** and then paid out to the individual concerned.
- 12.3.2. School funds should not be used to supplement these collections.

12.4. Entertainment and Hospitality

- 12.4.1. The Trust recognises that modest expenditure on entertainment or hospitality may be appropriate to encourage stakeholder engagement, attract investment, or strengthen relationships.
- 12.4.2. Such expenditure must be:
 - 12.4.2.1. Pre-approved by the CEO or CFO.
 - 12.4.2.2. Reasonable, proportionate, and clearly linked to a legitimate Trust purpose.
 - 12.4.2.3. Normally not exceeding **£50 per person**.
- 12.4.3. These costs will usually be met from unrestricted funds and must be supported by itemised receipts and a clear record of the purpose and attendees.

12.5. Compliance and Governance

- 12.5.1. All expenditure under this section is subject to audit and must comply with:
 - 12.5.1.1. The **Academy Trust Handbook 2025** principles of regularity, propriety, and value for money.
 - 12.5.1.2. HMRC tax rules for benefits and expenses.
 - 12.5.1.3. The Trust's **Anti-Fraud and Corruption Policy**.
- 12.5.2. Any exception to these limits requires CFO and CEO approval, and in certain cases, Board approval.

13. VAT

13.1. VAT Registration Status

13.1.1. The Trust is **not VAT registered**.

13.1.2. In accordance with HMRC rules, the Trust reclaims VAT paid on non-business purchases relating to the Trust's educational activities through the **VAT126 refund scheme for academies**.

13.2. VAT Reclaim Process

13.2.1. The Finance Assistant is responsible for preparing and submitting the monthly **VAT126 claim** once the month-end is closed in the Trust's accounting system (**Sage Intacct**).

13.2.2. The claim will be based on VAT incurred on eligible expenditure, supported by valid VAT invoices or receipts.

13.2.3. A **detailed transaction listing** will be generated from Sage Intacct and saved against the VAT submission record for audit purposes.

13.3. Receipt of Payment and Reconciliation

13.3.1. When HMRC refunds the claimed VAT, payment will be made directly into the Trust's bank account.

13.3.2. The Finance Assistant will:

13.3.2.1. Match the payment received to the submitted claim.

13.3.2.2. Record the receipt in Sage Intacct.

13.3.2.3. Reconcile the VAT control account as part of the monthly month-end procedures.

13.4. Compliance and Audit

13.4.1. All VAT126 claims must comply with **HMRC rules for academies** and be capable of withstanding audit scrutiny.

13.4.2. All supporting records, including invoices, receipts, and submission listings, must be retained for **at least six years** in line with ATH section 2.36 and HMRC requirements.

13.4.3. Any queries or disputes with HMRC regarding VAT claims will be managed by the CFO, with Board oversight if material.

14. Charging and Remissions

14.1. The Trust's approach to charging parents/carers and the circumstances in which charges will be waived or remitted. The policy ensures compliance with the Education Act 1996, the Academy Trust Handbook, and relevant DfE guidance, and applies to all schools within the Trust.

14.2. Principles

14.2.1. Education provided during school hours will be free of charge.

14.2.2. No pupil will be excluded from an activity simply because their parents/carers are unwilling or unable to pay.

14.2.3. Charges will only be made where permitted in law and will be transparent, proportionate, and fair.

14.2.4. Where a charge is made, it will not exceed the actual cost of the provision.

14.3. Activities for Which Charges Will Not Be Made

14.3.1. The Trust will not charge for:

14.3.1.1. Education provided during school hours (including the supply of materials, books, and equipment).

14.3.1.2. Admission applications to any school in the Trust.

14.3.1.3. Education provided outside school hours that is part of the national curriculum, a prescribed examination preparation, or religious education.

14.3.1.4. Entry for a prescribed public examination, if the pupil has been prepared for it at the school.

14.3.1.5. Instrumental or vocal tuition for pupils who are looked after by a local authority.

14.4. Activities for Which Charges May Be Made

14.4.1. Charges may be made for:

14.4.1.1. Non-curriculum activities: Education outside school hours that is not part of the national curriculum or religious education.

14.4.1.2. Board and lodging: For residential trips, the cost of board and lodging, except where pupils are entitled to remission.

14.4.1.3. Optional extras: Goods or services wholly or mainly outside school hours, e.g., transport, entrance fees, materials, equipment, or staff costs.

14.4.1.4. Music and vocal tuition: Instrumental or vocal tuition for individuals or groups, where it is not part of the national curriculum or a prescribed examination syllabus.

14.4.1.5. Examination fees: For entry to non-prescribed examinations or for re-sits without school agreement.

14.4.1.6. Breakages and loss: The cost of replacing or repairing school property wilfully damaged, lost, or defaced by pupils.

14.4.1.7. Materials: The cost of materials or ingredients for practical subjects if parents have indicated they wish to own the final product.

14.5. Voluntary Contributions

14.5.1. The Trust may seek voluntary contributions to support certain activities.

14.5.1.1. There is no obligation to contribute, and no pupil will be excluded from an activity because their parents/carers do not contribute.

14.5.1.2. If insufficient contributions are received, the activity may be cancelled.

14.6. Remissions

14.6.1. Parents/carers in receipt of the following may be entitled to a remission of charges for board and lodging on residential visits:

14.6.1.1. Income Support (IS)

14.6.1.2. Income-based Jobseeker's Allowance (IBJSA)

14.6.1.3. Income-related Employment and Support Allowance (IRESA)

- 14.6.1.4. Support under Part VI of the Immigration and Asylum Act 1999
- 14.6.1.5. Child Tax Credit (CTC) without Working Tax Credit, and with an annual income below the threshold set by HMRC
- 14.6.1.6. The guaranteed element of State Pension Credit
- 14.6.1.7. Universal Credit (with an income not exceeding the DfE threshold)
- 14.6.2. Each school will ensure parents/carers are aware of these entitlements in trip and activity communications.

14.7. Administration of Charges and Remissions

- 14.7.1. All charges and remissions must be approved by the Headteacher or their delegate.
- 14.7.2. Records will be kept of all charges made and remissions granted, in line with the Trust's financial procedures.
- 14.7.3. All communications regarding charges will be clear, transparent, and issued in advance.

14.8. Monitoring and Review

- 14.8.1. This policy will be reviewed annually by the Trust Board (or delegated committee) to ensure it remains compliant with legislation and guidance. Each school will publish a summary of its charging and remissions arrangements on its website.

15. Income

15.1. Core Funding

- 15.1.1. The Trust's main sources of income are grants received from the Department for Education (DfE) and from Local Authorities (LAs) for special educational needs (SEN) provision.
- 15.1.2. The receipt of all such funding will be monitored by the **CFO** and **Financial Controller** to ensure it matches expected allocations and funding agreements.

15.2. Other Income Streams

- 15.2.1. The Trust also generates income from other sources, including but not limited to:
- 15.2.2. Parental contributions for educational trips, visits, and residential camps.
- 15.2.3. Lettings and hiring of school premises.
- 15.2.4. School meal sales.
- 15.2.5. Voluntary donations.
- 15.2.6. Bank interest.
- 15.2.7. Training day charges.
- 15.2.8. Income from curriculum-based entrepreneurial activities.

15.3. Charges and Lettings

- 15.3.1. Charges to pupils may be made to cover costs of activities where allowed under the **Education Act 1996** and the Trust's **Charging and Remissions Policy**.
- 15.3.2. Lettings charges will be set in line with each school's approved Lettings Policy, except in exceptional cases where the **Headteacher** or **CFO** may set charges at their discretion.
- 15.3.3. All lettings should be recorded on the approved booking form, which will generate the relevant invoice.
- 15.3.4. All income received must be recorded in **Sage Intacct** and allocated to the correct bank account and nominal code.
- 15.3.5. The **Financial Controller** will review all outstanding invoices each month and escalate potential bad debts to the CFO for action.

15.4. Educational Trips and Visits

15.4.1. Approval and Planning

- 15.4.1.1. A **Lead Teacher** will be appointed for each trip, responsible for its organisation, budget, and compliance with Trust policy.
- 15.4.1.2. The Lead Teacher will complete a **Trip Proposal Form**, including:
 - 15.4.1.2.1. Full costing breakdown.
 - 15.4.1.2.2. Identification of any pupils funded through Pupil Premium.
- 15.4.1.3. The trip proposal must be approved by the **Headteacher**, and by the **CFO** if total costs exceed delegated thresholds.
- 15.4.2. **Parent Communication and Payments**
 - 15.4.2.1. Parents/carers must be informed in writing of the total cost per pupil and payment arrangements.
 - 15.4.2.2. Payments should normally be made via the Trust's online payment system (**Lunch Shop**).
 - 15.4.2.2.1. Where cash is received, a receipt should be issued and payment must be recorded on the system.
 - 15.4.2.3. The Finance Assistant will provide regular payment reports to the Lead Teacher, who is responsible for chasing outstanding balances.

15.4.3. Financial Control

- 15.4.3.1. Trips should run at cost price. Separate nominal ledger accounts will be created for each trip to track income and expenditure.
 - 15.4.3.1.1. Surpluses over £10 per pupil will normally be refunded to parents.
- 15.4.3.2. Any subsidy should be pre-approved by the CFO, with the funding source identified in the approved school budget.

- 15.4.3.3. No firm bookings should be made until sufficient payments have been received to cover the commitment.
- 15.4.4. All trips are covered under the Trust's insurance policy. The Lead Teacher must liaise directly with the provider regarding cancellations and claims.
- 15.4.5. If retrospective approval is needed for expenditure already committed, the matter must be referred to the **CFO**.

- 15.5. **Sale of Second-Hand Uniform**
 - 15.5.1. Second-hand uniform may be sold through the school office, at school events, or via approved school social media channels.
 - 15.5.2. All sales must be recorded and:
 - 15.5.2.1. For cash payments, a receipt should be issued, and cash stored securely before banking by the Finance Assistant.
 - 15.5.2.2. Where paid online, the payment must be recorded in the Trust's accounting system.
 - 15.5.3. Stock is donated by parents and recorded as unrestricted income.
 - 15.5.4. In some cases, the school may donate uniform items to disadvantaged pupils in line with its welfare policies.

- 15.6. **Compliance**
 - 15.6.1. All income must be:
 - 15.6.1.1. Recorded accurately in **Sage Intacct**.
 - 15.6.1.2. Supported by documentation (e.g., booking forms, invoices, receipts).
 - 15.6.1.3. Banked promptly and securely.

- 16. Bad Debts**
- 16.1. Review of Debts**
- 16.1.1. All outstanding debts, regardless of value or type, will be reviewed monthly by the **Finance Assistant** or **Financial Controller**.
- 16.2. Initial Reminder**
- 16.2.1. Where a debt is overdue by at least 14 calendar days, the **Financial Controller** will issue a reminder letter requesting payment within **10 working days**.
- 16.2.2. The reminder will also offer the debtor the opportunity to disclose any financial difficulty and request a payment plan.
- 16.3. Payment Plans**
- 16.3.1. The **Financial Controller** may approve payment plans of up to **three months** in duration.
- 16.3.2. Any plan exceeding three months requires **CFO** approval. Payment plans longer than **12 months** will not normally be approved.
- 16.3.3. All payment plans must be confirmed in writing and signed by both the Trust and the debtor.
- 16.4. Final Demand**
- 16.4.1. If a debtor fails to respond to the reminder letter within **15 working days**, or defaults on an agreed payment plan by falling **15 days in arrears**, the **Financial Controller** will issue a **Final Demand** requesting payment within **10 working days**.
- 16.5. Classification as Bad Debt**
- 16.5.1. At the point a Final Demand is issued, the debt will be classified as a **bad debt** and a provision recorded in **Sage Intacct**.
- 16.6. Escalation to Debt Collection**
- 16.6.1. If the debtor fails to pay after the Final Demand and no alternative agreement is reached (authorised only by the **CFO** or **CEO**), the debt may be passed to an approved debt collection agency.
- 16.7. Debt Write-Offs**
- 16.7.1. Debt write-offs must comply with **Academy Trust Handbook 2025** rules and any relevant DfE sanctions or restrictions in place at the time.
- 16.7.2. Authorisation limits:
- 16.7.2.1. **Up to £1,000** – CFO.
- 16.7.2.2. **Over £1,000** – Finance, Audit and Risk Assurance Committee (FARA).
- 16.7.3. Once approved for write-off, the **Financial Controller** will record the adjustment in **Sage Intacct** and maintain an audit trail including:
- 16.7.3.1. Reason for the write-off.
- 16.7.3.2. Actions taken to recover the debt.
- 16.7.3.3. Relevant correspondence.

17. Cash Management

17.1. Custody of Cash and Cheques

- 17.1.1. Cash and cheques must be held securely, with access restricted to authorised officials only.
- 17.1.2. Banking must take place as appropriate to comply with **Risk Protection Arrangement (RPA)** insurance limit for the school's locked receptacle.
- 17.1.3. Where no other formal documentation exists, official **pre-numbered academy receipts** must be issued for all cash and cheque receipts.
- 17.1.4. All cash and cheques must be stored in the school safe, or equivalent, prior to banking.

17.2. Bank Accounts

- 17.2.1. All new bank accounts must be authorised by the **CEO** and/or **CFO**. A formal memorandum must set out arrangements for the operation of the account, including cheque signing, transfer authorisation, and electronic banking protocols.
- 17.2.2. The operation of **BACS** and other forms of electronic payment must be subject to the same level of control as cheque payments.
- 17.2.3. The Trust operates a central bank account. Any other accounts (e.g., "Friends of" associations) must remain entirely separate from Trust funds and may only be used for genuine fundraising purposes.
- 17.2.4. Such accounts must not be used to process income or receipts relating to school activities undertaken during Trust time, or for consultancy carried out under the school/Trust name while on Trust payroll.
- 17.2.5. Where such accounts exist, the Trust reserves the right to request and review a **full transaction listing** to ensure compliance and proper allocation of income.

17.3. Deposits

- 17.3.1. Details of any banking deposit must be recorded on a paying-in slip, counterfoil, or supporting record, and must include:
 - 17.3.2. The total amount deposited.
 - 17.3.3. A reference (e.g., receipt number or debtor name).

17.4. Payments and Withdrawals

- 17.4.1. All cheques and withdrawal instruments must bear **two authorised signatures** from the approved list:
 - 17.4.1.1. CEO
 - 17.4.1.2. CFO
 - 17.4.1.3. Headteacher
 - 17.4.1.4. Financial Controller
 - 17.4.1.5. Chair of the MAT Board
- 17.4.2. This requirement applies to all accounts operated by or on behalf of the Trust.
- 17.4.3. Multiple bank accounts operated by the Trust are subject to the same authorisation and control arrangements.

17.5. Bank Administration and Reconciliation

- 17.5.1. The Financial Controller must ensure bank statements are received regularly and reconciliations are performed at least monthly.
 - 17.5.2. Reconciliations must ensure:
 - 17.5.2.1. All bank accounts reconcile to the cash book.
 - 17.5.2.2. Reconciliations are prepared by the Finance Assistant.
 - 17.5.2.3. Independent review is undertaken by the CFO, CEO, and/or internal audit.
 - 17.5.2.4. Any adjustments are processed promptly.

17.6. Petty Cash Accounts

- 17.6.1. The maximum petty cash float per school is £500, administered by authorised office staff.

- 17.6.2. The Trust aims to operate on a **cashless basis**, so petty cash use is subject to strict scrutiny and must be justified.
- 17.6.3. Petty cash procedures:
 - 17.6.3.1. Payments from petty cash require a till receipt or proof of payment. Claims may not exceed £50 without CFO or Headteacher approval.
 - 17.6.3.2. All vouchers require the Headteacher's signature and the claimant's signature to confirm receipt.
 - 17.6.3.3. Floats must be stored in a locked drawer or safe with access restricted to authorised staff.
 - 17.6.3.4. No personal cheques may be cashed through petty cash.
 - 17.6.3.5. Petty cash is reimbursed by cheque from the school's bank account, with date, amount, and reference recorded.
 - 17.6.3.6. All receipts and supporting evidence must be submitted to the central finance team for retention.
- 17.6.4. Floats should not normally require replenishment more than once per half term.

17.7. Cash Flow Forecasting

- 17.7.1. The Financial Controller prepares cash flow forecasts to ensure sufficient funds are available for day-to-day operations.
- 17.7.2. Forecasts will be used to:
 - 17.7.2.1. Identify surplus balances for potential investment.
 - 17.7.2.2. Identify potential shortfalls and take early action, such as transferring funds between accounts or adjusting budgets.

18. Investments

18.1. Investments shall be limited to placing spare cash resources into a safe high interest bank account, which does not have a limit on accessibility. Any other investment will only be made on prior approval of the MAT Board.

19. Fixed assets

19.1. Asset register

- 19.1.1. The MAT Board is responsible for maintaining the schools' assets securely.
- 19.1.2. All items above £500, or those of a highly desirable nature (such as iPads), should be entered onto an inventory list.
- 19.1.3. The Trusts capitalisation limit of £5000 will be used when considering items to be recognised on the Trusts Balance Sheet. This can be adjusted in liaison with the CFO and depends upon nature and type of purchase.
- 19.1.4. The asset register should include the following information:
 - 19.1.4.1. asset description
 - 19.1.4.2. asset number
 - 19.1.4.3. serial number
 - 19.1.4.4. date of acquisition
 - 19.1.4.5. asset cost
 - 19.1.4.6. source of funding (% of original cost funded from DfE grant or other sources)
 - 19.1.4.7. expected useful economic life
 - 19.1.4.8. depreciation (for those items with a capital value of above £5k)
 - 19.1.4.9. current book value
 - 19.1.4.10. location
 - 19.1.4.11. name of member of staff responsible for the asset
- 19.1.5. The register helps
 - 19.1.5.1. ensure that staff take responsibility for the safe custody of assets
 - 19.1.5.2. enable independent checks on the safe custody of assets as a deterrent against theft or misuse
 - 19.1.5.3. manage the effective utilisation of assets and to plan for their replacement
 - 19.1.5.4. the external auditors draw conclusions on the annual accounts and the academy's financial system and
 - 19.1.5.5. support insurance claims in the event of fire, theft, vandalism or other disasters

19.2. Security of assets

- 19.2.1. Stores and equipment must be secured by means of physical security devices. Only authorised staff may access the stores
- 19.2.2. All the items in the register should be permanently and visibly marked as the academy's property and there should be a regular check by someone other than the person maintaining the register. Discrepancies between the physical count and the amount recorded in the register to be investigated promptly and where significant, reported to the governing body. Inventories of academy property to 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.
- 19.2.3. The immediate responsibility for the safeguarding of equipment lies with the end user departments; in support of this the academy provides security measures, including, burglar alarm systems, inventories, security marking, maintenance and support agreements where appropriate and insurance cover.

19.3. Depreciation

- 19.3.1. Depreciation is provided on all fixed assets in line with recognised accounting standards and best practice guidelines, at rates calculated to write off the cost of each asset on a straight line basis over its expected useful life, as follows:
 - 19.3.1.1. Freehold buildings x 2% (50 years)
 - 19.3.1.2. Fixtures, fittings and equipment x 20% (5 years)
 - 19.3.1.3. ICT equipment x 33 1/3% (3 years)
 - 19.3.1.4. Motor vehicles x 25% (4 years)

19.4. Disposals

- 19.4.1. Items which are to be disposed of by sale or destruction must be authorised for disposal by the CEO or CFO, and where significant (above £5k NBV), be authorised by the MAT Board, as well as sold following competitive tender.
- 19.4.2. The academy must seek the approval of the DfE in writing if it proposes to dispose of an asset or assets for which a capital grant in excess of £20,000 was paid, or whether any sanctions in place require prior approval from the DfE
- 19.4.3. 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.
- 19.4.4. The academy will reinvest the proceeds from all asset sales.
- 19.4.5. All disposals of land must be agreed in advance with the Secretary of State.

19.5. Loan of Assets

- 19.5.1. Items of academy property must not be removed from academy premises without the authority of the Headteacher or CFO. A record of the loan must be recorded in a loan book and booked back in academy when it is returned.
- 19.5.2. If assets are on loan for extended periods or to a single member of staff on a regular basis the situation may give rise to a 'benefit-in-kind' for taxation purposes. Loans should therefore be kept under review and any potential benefits discussed with the academy's auditors.
- 19.5.3. The academy will allow persons and or organisation who are connected to the academy to use assets, where insurance allows such use and the risks to such assets are minimal. Permission and advice must be sought from the CFO.

20. Insurance

20.1. General Requirements

- 20.1.1. The MAT Board will ensure that the Trust maintains appropriate insurance arrangements to protect its assets, staff, pupils, and legal responsibilities, in line with statutory requirements and the **Academy Trust Handbook 2025**.
- 20.1.2. Where the Trust is a member of the **DfE's Risk Protection Arrangement (RPA)**, the Board will review the scope of RPA cover annually and arrange additional commercial insurance where risks are not fully covered by the RPA.

20.2. Minimum Insurance Cover

- 20.2.1. As a minimum, the Trust will ensure cover for:
- 20.2.2. **Buildings and contents** – including accidental damage, theft, and special equipment.
- 20.2.3. **Employers' liability** – covering injury or illness to employees arising from their work.
- 20.2.4. **Public liability** – covering injury or damage to third parties and their property.

20.3. Annual Risk Review

- 20.3.1. All insurable risks will be reviewed annually by the CFO in consultation with the Trust's insurance provider (or RPA liaison) to ensure cover levels remain adequate and cost-effective.
- 20.3.2. Significant changes to risk exposure (e.g., new building projects, acquisitions, or changes in activities) will trigger an immediate insurance review.

20.4. Contractor Requirements

- 20.4.1. All contractors working on Trust premises must provide evidence of valid **public liability insurance** before commencing work.
- 20.4.2. Minimum acceptable cover is **£5 million** unless otherwise agreed by the CFO.

20.5. Lettings and Third-Party Use

- 20.5.1. Hirers of school premises or facilities must either:
 - 20.5.1.1. Be covered by the Trust's insurance at an agreed additional cost; or
 - 20.5.1.2. Provide evidence of valid **public liability insurance** with a minimum indemnity of £5 million.

20.6. Incident Reporting and Claims

- 20.6.1. All accidents, losses, or incidents that may give rise to an insurance claim must be reported **immediately** to the school office, the CFO, and the insurer (or RPA contact).
- 20.6.2. Claims under an insurance policy must be authorised by the **Headteacher** or **CFO** before submission to the insurer.
- 20.6.3. A full record of all claims, supporting evidence, and correspondence must be maintained by the CFO for a minimum of **six years** in accordance with ATH section 2.36.

21. Related Party Transactions

21.1. The Trust must comply in full with the requirements set out in Part 5 of the Academy Trust Handbook regarding related party transactions. These rules apply to all goods or services provided by or to individuals or organisations connected to the Trust.

21.2. **Definition:** Related parties include persons and entities with control or significant influence over the Trust, key management personnel, close family members, and organisations in which these individuals have a significant interest, as defined in section 33 of FRS 102 and the Charities SORP.

21.3. Principles:

21.3.1. All relevant individuals complete the register of interests in accordance with sections 1.45 to 1.48 of the Handbook.

21.3.2. No one connected to the Trust uses their position for personal gain or receives payment on preferential terms.

21.3.3. Payments to members or trustees are only made if permitted by the Articles or Charity Commission authority, and comply with the Funding Agreement.

21.3.4. The 'at cost' rule is applied where required (see below).

21.4. Reporting Requirements

21.4.1. All contracts and agreements with related parties must be reported to the Department for Education (DfE) in advance of commencement or renewal via the online related party transaction form.

21.4.2. The Trust must obtain DfE prior approval for any contract or agreement with a related party for the supply of goods or services agreed on or after 1 September 2023, where:

21.4.2.1. The individual contract or agreement exceeds £40,000 in the same financial year ending 31 August, or

21.4.2.2. Entering into the agreement would cause the cumulative value with that related party to exceed £40,000 in that financial year.

21.5. **Exemptions.** The £40,000 approval requirement does not apply to contracts with:

21.5.1. Colleges, universities, or schools that sponsor the Trust.

21.5.2. Other state-funded schools or colleges, including academies.

21.5.3. Religious authorities providing services fundamental to the Trust's religious character. (This exemption does not extend to subsidiaries of such bodies.)

21.5.4. Novel, Contentious, or Repercussive Transactions
Any related party transaction that is novel, contentious, or repercussive requires DfE prior approval, regardless of value.

21.6. At Cost Requirements

21.6.1. Contracts with related parties exceeding £2,500 cumulatively in a financial year must be at no more than cost for the element above £2,500.

21.6.2. A written statement of assurance confirming charges do not exceed cost must be obtained, supported by open book arrangements.

21.6.3. 'At cost' is defined as the full cost of all resources used in supplying the goods or services, without profit, and must include both direct and proportionate indirect costs.

21.7. Record Keeping

21.7.1. The Trust must retain clear evidence to demonstrate compliance with all reporting, approval, and at-cost requirements, and disclose related party transactions in its annual accounts in accordance with the Academies Accounts Direction.

22. STAFF EXPENSES POLICY

- 22.1. Staff may claim reimbursement for reasonable expenses incurred wholly, necessarily and exclusively in the course of the business of the Academy Trust. These may arise from attending meetings, training or conferences, or purchases made on the Trust's behalf. Any purchase made should be approved by the budget holder prior to purchase – there is no right to reimbursement where there is no authorisation prior to purchase.
- 22.2. It is essential that Inland Revenue regulations are met and therefore this policy must be adhered to when making an expenses claim.

22.3. Claiming Expenses

- 22.3.1. Payments for the personal expenditure of staff must be made using a applicable Staff Expenses Claim Form.
- 22.3.2. The purchase of classroom equipment and items should normally be completed using the purchase ordering system and paid for directly by the school. A Staff Expenses Claim Form may be used for reclaiming the cost of such purchases on occasion and if approved by the budget holder.
- 22.3.3. Staff should make reasonable efforts to get the best value possible when purchasing items, food or travel tickets.
- 22.3.4. Supporting documents required as evidence, such as receipts and bills, must be attached to the Staff Expenses Claim Form.
- 22.3.5. Claim forms must be approved and signed by the budget holder.
- 22.3.6. Claims which do not meet approval will not processed and will be returned.
- 22.3.7. A copy of a completed claim will be recorded and stored.
- 22.3.8. Claims will normally be reimbursed through payroll.
- 22.3.9. The submission of false claims will be treated as a fraud and will lead to disciplinary action.

22.4. Tax considerations

- 22.4.1. Claims adhering to the procedures in this Policy will be paid without the deduction of income tax. However, it is the claimant's responsibility to ensure payment for any due tax is made.
- 22.4.2. Other expenses will be paid via payroll. These will be treated as benefits-in-kind and taxed accordingly.

22.5. Travel Expenses

- 22.5.1. Payment for mileage will be paid at the HMRC advisory rates.
- 22.5.2. Staff are encouraged to car pool where possible and sharing is expected, save for management of risk, where staff start from and return to the same location after making the same visit.
- 22.5.3. Mileage claims should have attached a VAT receipt for fuel used. The claimant is responsible for attaching the receipt and the person authorising the claim is responsible for checking the receipt is valid prior to payment.
- 22.5.4. An appropriate receipt must:
- 22.5.4.1. Be dated before the date of the journey claimed for.
- 22.5.4.2. Show the amount of fuel purchased in litres.
- 22.5.4.3. Show the name of the fuel supplier and their VAT registration number.
- 22.5.4.4. Account for at least 25% of the total amount of the mileage claim.
- 22.5.5. If several low mileage claims are submitted, a single receipt showing fuel purchased to cover all the miles claimed is sufficient.
- 22.5.6. The date of, reason for, starting point and destination of the journey should all be shown on the Staff Expenses Claim Form.
- 22.5.7. Claims should be submitted monthly. Claims submitted over 6 months after the expense was incurred may not be paid.

- 22.5.8. Parking or speeding fines will never be reimbursed. Toll road charges may be reimbursed if the budget holder's permission has been granted before the journey is made.
- 22.5.9. Unless contractually able to, or undertaking work outside of normal hours resulting in additional unreasonable additional beyond normal expected commuting (to be agreed by authoriser), business mileage will never be paid for a journey from home to a normal place of work.
- 22.5.10. If a journey starts at home or finishes at home, the mileage claimed should be the lesser of the distance actually travelled compared to normal home to work mileage.

22.6. Vehicle Insurance

- 22.6.1. The Trust does not provide car insurance for staff using their own vehicles. Staff members are responsible for ensuring they are appropriately insured prior to travel. Staff must also ensure that the car is safe and legal to drive. The claiming of milage expenses infers your confirmation of this.

22.7. Travel by Rail, Bus or Aeroplane

- 22.7.1. The use of public transport for eligible journeys will be reimbursed upon receipt, provided the expenses are reasonable. Staff should ensure they travel by the most economical method bearing in mind both the cost and travel time. Any overseas travel should be approved by the CFO before booking to confirm that it is in the interests of the Trust. Accompanying overseas school trips for pupils will fall into that category.
- 22.7.2. Staff should use the most economical class of travel. Generally, this is standard or economy class unless the cost of first class is at the same cost. If a member of staff wishes to travel first class they may do so on reimbursement to the Trust of the difference in the fare.
- 22.7.3. The Academy Trust will not pay for the travel of any accompanying person, unless their attendance is required as a representative of the Academy Trust or the staff member requires assistance by means of reasonable adjustments.

22.8. Cost of Meals and Accommodation

- 22.8.1. The cost of meals purchased by staff required to work at a location away from their home or the normal place of work may be claimed. No reimbursement will be made for an activity or visit where the staff member normally would have provided their own lunch e.g. school trips. However the cost of meals will be paid when on a course or otherwise away overnight.
- 22.8.2. Reasonable expenses for the cost of accommodation, food and drink will be reimbursed when supported by receipts.
- 22.8.3. Where an employee has to work away from their home and/or normal place of work, requiring accommodation, the Trust will reimburse or arrange such accommodation. The cost of which will only cover the required duration to support the business required activity. It will not meet the cost of additional parties or accommodation provided to a spouse or other family members.
- 22.8.4. Personal items, such as alcoholic drinks, mini-bars, newspapers, movies etc. will not be reimbursed and their total should be deducted from any bills submitted for expenses purposes.
- 22.8.5. If an employee chooses to stay with friends or relatives instead of in a hotel, an allowance of £30 per night may be claimed.

22.9. Telephone and Mobile Expenses

- 22.9.1. Business calls made from a home telephone or personal mobile phone may be reimbursed subject to provision of an itemised telephone bill and their inclusion on the Staff Expenses Claim Form. Line or equipment rental will not be reimbursed.

22.10. Cleaning of Uniforms/ equipment

22.10.1. A limited number of staff are provided with branded uniforms or other equipment as part of their role in the Trust. The uniforms should be maintained by the staff member so they are clean and tidy in use. No expenses can be claimed for cleaning unless the cost is exceptional (and more than would be expected for other work attire).

22.11. Overseas Travel

22.11.1. When travelling overseas the same general principles for staff expenses as above apply. Travel arrangements should be made through an ABTA registered agent. Insurance provision should be investigated before the trip and if necessary additional cover purchased.

22.11.2. It is recognised that on some occasions, when not accompanying children, a member of staff may wish to extend their stay into the weekend or school holidays for personal reasons. This is permitted as long as any additional costs incurred (flight cost, hotel room, subsistence) is paid for by the member of staff.

23. GOVERNORS/DIRECTORS ALLOWANCES

- 23.1. Members of the governing board may claim allowances to cover expenditure necessary to enable them to perform their duties.
- 23.2. This does not include an attendance allowance, or payment to cover loss of earnings.
- 23.3. Members of the governing board may claim allowances by submitting it to the CFO by email.
- 23.4. Allowances will only be paid on the provision of a receipt, and will be limited to the amount shown on the receipt.
- 23.5. Members of the governing board may claim for:
 - 23.5.1. Childcare
 - 23.5.2. Care for elderly or dependent relatives
 - 23.5.3. Extra costs incurred because they have a special need or English as a second language
 - 23.5.4. Travel and subsistence costs
 - 23.5.5. Telephone charges, photocopying, postage, stationery, etc.
 - 23.5.6. Other justifiable allowances
- 23.6. Claims will be paid in arrears on a case-by-case basis.
- 23.7. All claims will be reported to FARA to maintain transparency
- 23.8. The chair of governors (or the vice-chair, where appropriate) may investigate claims that appear excessive or inconsistent. All claims will be subject to an independent audit.
- 23.9. Travel expenses where a governor uses their own vehicle must not exceed the HM Revenue and Customs (HMRC) approved mileage rates (please see HMRC website).

24. Risk Management

24.1. This section sets the framework and processes for identifying, assessing, managing, and monitoring risk across the Trust. It supports compliance with the Academy Trust Handbook, funding agreement, and the Trust's Articles of Association. Effective risk management enables the Trust to:

- 24.1.1. Achieve strategic objectives.
- 24.1.2. Safeguard pupils, staff, and assets.
- 24.1.3. Maintain financial stability and value for money.
- 24.1.4. Protect the Trust's reputation.

24.2. All trustees, members, local governing bodies, staff, and contractors engaged in activities on behalf of the Trust will consider:

- 24.2.1. Strategic risks – long-term risks to the Trust's vision, mission, and objectives.
- 24.2.2. Operational risks – day-to-day risks affecting teaching, learning, finance, estates, ICT, HR, and compliance.
- 24.2.3. Financial risks – including fraud, funding volatility, and budgetary control.
- 24.2.4. Compliance risks – legal, regulatory, and safeguarding obligations.
- 24.2.5. Reputational risks – adverse publicity or stakeholder confidence loss.
- 24.2.6. Project risks – significant change programmes or capital works.

24.3. The Trust will:

- 24.3.1. Embed risk management into strategic and operational planning.
- 24.3.2. Maintain a culture of openness and transparency around risk reporting.
- 24.3.3. Use a proportionate approach to risk assessment, balancing opportunity and control.
- 24.3.4. Apply the "Three Lines of Defence" model:
 - 24.3.4.1. Operational management – owns and manages risk.
 - 24.3.4.2. Governance oversight – ensures risk is being effectively managed.
 - 24.3.4.3. Independent assurance – internal and external audits, reviews, and inspections.

24.4. Roles and Responsibilities

24.4.1. Trust Board

- 24.4.1.1. Owns the risk management framework and policy.
- 24.4.1.2. Approves the Trust's risk appetite and tolerance levels.
- 24.4.1.3. Reviews the strategic risk register at least termly.

24.4.2. FARA

- 24.4.2.1. Oversees risk management processes.
- 24.4.2.2. Reviews risk reports and escalations from local governing bodies and executive leaders.
- 24.4.2.3. Recommends risk appetite changes to the Board

24.4.3. CEO

- 24.4.3.1. Ensures effective implementation of the risk management framework.
- 24.4.3.2. Escalates significant risks to the Board.

24.4.4. CFO

- 24.4.4.1. Ensures financial risk management processes are effective.
- 24.4.4.2. Supports compliance with Academy Trust Handbook financial controls.

24.4.5. Headteachers

- 24.4.5.1. Identify and manage operational risks within their areas.
- 24.4.5.2. Maintain local risk registers, updating them termly.
- 24.4.5.3. Escalate risks outside agreed tolerance levels.

24.4.6. All Staff

- 24.4.6.1. Have a responsibility to identify and report risks and near misses.

24.4.7. Risk Appetite and Tolerance

- 24.4.7.1. The Trust will set a risk appetite statement annually, defining the amount and type of risk it is willing to accept in pursuit of its objectives.

24.4.7.2. Different risk categories may have different tolerances (e.g., low tolerance for safeguarding risk, higher tolerance for innovation risk).

24.4.8. Risk Identification and Assessment

24.4.8.1. Risks will be identified through:

24.4.8.1.1. Strategic planning.

24.4.8.1.2. Operational reviews.

24.4.8.1.3. Incident and near miss reporting.

24.4.8.1.4. Audit and inspection outcomes.

24.4.8.1.5. External environment scanning (e.g., policy, funding, demographic changes).

24.4.8.2. Each risk will be assessed using a likelihood x impact matrix to determine a risk score and prioritisation level.

24.4.9. Risk Registers

24.4.9.1. The Strategic Risk Register records high-level risks that could impact the Trust's objectives.

24.4.9.2. Local Risk Registers record operational and school-specific risks.

24.4.9.3. All risk registers will include:

24.4.9.3.1. Risk description.

24.4.9.3.2. Risk owner.

24.4.9.3.3. Likelihood and impact scores.

24.4.9.3.4. Current controls in place.

24.4.9.3.5. Further actions required.

24.4.9.3.6. Target score and review date.

24.5. Monitoring and Reporting

24.5.1. Local risk registers will be reviewed at least annually by each school's leadership and reported to the central executive team.

24.5.2. The central executive team will update the Strategic Risk Register and report to the FARA Committee.

24.5.3. The Trust Board will review the Strategic Risk Register at least once per year.

25. Anti-Fraud and Corruption Policy

25.1. The Trust is committed to preventing, detecting, and responding to fraud, theft, corruption, and other irregularities.

25.2. The Trust is committed to operating with integrity, transparency, and accountability, ensuring the proper use of public funds and safeguarding its assets.

25.3. This section covers:

25.3.1. Fraud (including theft, false accounting, and deception).

25.3.2. Bribery and corruption.

25.3.3. Collusion, conspiracy, and conflicts of interest.

25.3.4. Misuse of assets or funds.

25.3.5. Falsification of records or claims.

25.4. Definitions

25.4.1. **Fraud** – Any intentional act of dishonesty or deception intended to result in financial or personal gain, as defined in the Fraud Act 2006.

25.4.2. **Corruption** – Offering, giving, soliciting, or accepting an inducement or reward that influences the action of an employee, trustee, or official, contrary to the proper conduct of their duties.

25.4.3. **Bribery** – Giving or receiving something of value to influence a decision or action, as prohibited under the Bribery Act 2010.

25.5. The Trust will:

25.5.1. Maintain zero tolerance towards fraud, theft, and corruption.

25.5.2. Promote a culture of honesty, openness, and accountability.

25.5.3. Establish clear procedures for prevention, detection, and investigation.

25.5.4. Support and protect individuals who report suspected wrongdoing in good faith.

25.5.5. Take appropriate disciplinary, civil, and criminal action where wrongdoing is proven.

25.6. The Trust will deter fraud and corruption through:

25.6.1. **Strong internal controls** – segregation of duties, authorisation limits, and regular reconciliations.

25.6.2. **Clear financial regulations** – aligned with the Academy Trust Handbook.

25.6.3. **Regular training and awareness** – so staff understand risks and reporting mechanisms.

25.6.4. **Pre-employment checks** – including references and right-to-work verification.

25.6.5. **Declaration of interests** – for trustees, governors, and staff.

25.6.6. **Supplier due diligence** – especially for high-value or related-party contracts.

25.7. Fraud and corruption may be detected through:

25.7.1. Routine internal checks and reconciliations.

25.7.2. Internal audit reviews.

25.7.3. Whistleblowing reports.

25.7.4. Suspicious transaction monitoring.

25.7.5. External audit or regulatory review.

25.8. Reporting Suspicions

25.8.1. All concerns should be reported immediately to the CEO or the CFO.

25.8.2. Where the concern involves either of these roles, it should be reported to the Chair of the Audit & Risk Committee.

25.8.3. Reports can also be made under the Trust's Whistleblowing Policy.

25.8.4. The Trust will comply with its obligation to report material fraud to the DfE in line with the Academy Trust Handbook.

- 25.9. Investigation: The CEO, in consultation with FARA, will determine the appropriate course of action.
- 25.9.1. Investigations may involve internal audit, HR, legal advisors, or the police.
- 25.9.2. All investigations will be handled discreetly, fairly, and in accordance with employment and data protection law.

25.10. Disciplinary Action

- 25.10.1. Proven cases of fraud, theft, or corruption will be treated as gross misconduct.
- 25.10.2. Disciplinary action may result in dismissal and referral to law enforcement.
- 25.10.3. Where appropriate, the Trust will seek to recover losses through civil proceedings or insurance claims.

25.11. Responsibilities

- 25.11.1. **Trust Board:** Holds overall accountability for the Trust's anti-fraud framework.
- 25.11.2. **FARA:** Oversees the adequacy and effectiveness of fraud prevention controls.
- 25.11.3. **CEO:** Ensures effective procedures are in place for preventing, detecting, and investigating fraud.
- 25.11.4. **CFO:** Maintains strong financial controls and monitors compliance.
- 25.11.5. **Managers:** Implement financial controls and report suspected irregularities immediately.
- 25.11.6. **All Staff:** Have a duty to act honestly and to report any suspicion of fraud or corruption.

25.12. Confidentiality and Protection

- 25.12.1. Whistleblowers will be protected from victimisation and retaliation, in accordance with the Public Interest Disclosure Act 1998.
- 25.12.2. Reports will be treated in confidence, with the identity of the reporter disclosed only where necessary for investigation or legal purposes.

26. Document Retention

26.1. Purpose & Legal Framework

- 26.1.1. The Trust retains records only as long as necessary for operational, legal, historical, or audit purposes, per **UK GDPR** and the **Data Protection Act 2018**.
- 26.1.2. This policy also reflects guidance for academies from **GOV.UK** and the **Academy Trust Handbook 2025**.

Record Type	Retention Period	Reference / Legislation
Contracts	6 years from final payment	Limitation Act 1980, Gov.uk guidance (GOV.UK)
Debtor Records	6 years from the end of the financial year	Limitation Act 1980 (GOV.UK)
VAT Records	6 years from financial year-end	HMRC VAT guidance (GOV.UK)
Admissions Registers	6 years from date of admission	School Attendance Regulations 2024 (GOV.UK)
Attendance Registers	6 years from date of entry	As above (GOV.UK)
Governor/Board Meeting Records	10 years from date of meeting	Academy Trust Governance guidance (GOV.UK)
Educational Visit Records	10 years from visit date	HASPEV guidance/limitation principles (GOV.UK)
Staff Personnel Files	6 years after employment ends	Limitation Act 1980 (GOV.UK)
Pay Records & Maternity	3 years from end of relevant tax year	HMRC PAYE requirements (GOV.UK)
DBS Certificates	6 months after recruitment	KCSIE guidance (GOV.UK)
Health & Safety Records (e.g., fire assessments)	Life of document + 6 years	HSE / legal advice (GOV.UK)
Maintenance Records	6 years from financial year-end	VAT Notice 700/21 (GOV.UK)
Title Deeds	12 years from end of deed	Limitation Act 1980 (GOV.UK)
Memoranda of Understanding	Life of trust + 6 years	Governance retention guidance (GOV.UK)

26.2. Retention Principles

- 26.2.1. Records should only be retained for as long as justified by legal or business need.
- 26.2.2. Electronic retention is preferred. Once records are scanned, originals should be securely destroyed unless statutory retention is required.
- 26.2.3. Records pending audit, investigation, or legal action must **not** be destroyed until the matter is resolved.

26.3. Metadata, Disposal & Auditability

- 26.3.1. For disposal of records, reasons must be documented in a disposal log.
- 26.3.2. Archived records should remain accessible, reliable, and retrievable for audit and governance review.

26.4. Annual Review & Exceptions

- 26.4.1. The Trustee Board (via FARA) will review retention schedules annually to confirm continued appropriateness.
- 26.4.2. Exceptional circumstances (e.g., ongoing litigation, statutory inquiries) may require longer retention. These must be documented.

26.5. Secure Disposal

- 26.5.1. Paper records should be shredded or securely disposed. Electronic records must be permanently deleted using verified processes.
- 26.5.2. Disposal must occur only after the retention period and with documented approval.

27. **Reserves Policy**
- 27.1. **Purpose and Principles**
- 27.2. The Trust's Reserves Policy ensures prudent financial planning, compliance with the Academy Trust Handbook 2025, and sustainability in the delivery of education.
- 27.3. The purpose of holding reserves is to:
- 27.3.1. Provide working capital to cover timing differences in income and expenditure.
- 27.3.2. Act as a buffer against unforeseen events, including funding changes or emergencies.
- 27.3.3. Support investment in capital projects and strategic priorities.
- 27.3.4. Maintain financial stability and the Trust's going concern status.
- 27.4. The Trust recognises the balance between holding adequate reserves for financial resilience and ensuring funds are spent for the benefit of current pupils.
- 27.5. **Categories of Reserves**
- 27.5.1. **Unrestricted Reserves** – funds with no restrictions on use, derived from trading activities, lettings, or donations without conditions.
- 27.5.2. **Restricted Reserves** – funds subject to specific conditions, such as General Annual Grant (GAG) and other DfE grants, which must be used in line with the Funding Agreement and grant terms.
- 27.5.3. **Restricted Fixed Asset Reserves** – funds received for capital purposes only, to be spent on acquiring, enhancing, or maintaining fixed assets.
- 27.6. **Target Reserve Levels**
- 27.6.1. The Trust aims to maintain unrestricted reserves equivalent to a minimum of one month's operating expenditure, unless the Board formally approves a variation.
- 27.6.2. The target will be reviewed annually during budget setting, taking into account:
- 27.6.2.1. Future funding forecasts.
- 27.6.2.2. Identified risks in the Strategic Risk Register.
- 27.6.2.3. Planned capital investment.
- 27.6.2.4. Contingency requirements for emergencies.
- 27.7. **Use of Reserves**
- 27.7.1. Reserves will only be used for purposes consistent with the Trust's charitable objectives.
- 27.7.2. Use of unrestricted reserves above £20,000 requires CFO and CEO approval, with Board notification.
- 27.7.3. Use of restricted reserves must comply with grant terms, ATH requirements, and the Charities SORP.
- 27.8. **Monitoring and Reporting**
- 27.8.1. The CFO will report the reserves position to the Board at least three times per year via management accounts.
- 27.8.2. The Board will review the adequacy of reserves annually as part of the budget approval process.
- 27.8.3. The reserves position will be disclosed in the annual report and accounts in accordance with the Academies Accounts Direction.

28. **Contingency and Business Continuity for Finance**

28.1. **Purpose**

- 28.1.1. This section sets out the Trust's arrangements to ensure continuity of critical financial operations in the event of disruption, in line with the Academy Trust Handbook 2025 (ATH 6.9) and good governance practice.
- 28.1.2. The aim is to maintain essential financial services, protect public funds, and meet statutory reporting deadlines during emergencies.

28.2. **Scope**

- 28.2.1. This plan covers financial continuity risks including, but not limited to:
 - 28.2.1.1. Loss of finance system access (e.g., Sage Intacct outage).
 - 28.2.1.2. Loss of key finance staff.
 - 28.2.1.3. Cyber incidents or data breaches.
 - 28.2.1.4. Denial of access to Trust premises.
 - 28.2.1.5. Significant utility failures.
 - 28.2.1.6. Major incidents such as fire, flood, or pandemic.

28.3. **Key Financial Processes Covered**

- 28.3.1. Payroll processing.
- 28.3.2. Supplier payments.
- 28.3.3. Income collection and banking.
- 28.3.4. Grant claims and statutory returns (e.g., budget forecast, accounts return).
- 28.3.5. Bank reconciliations and month-end close.

28.4. **Roles and Responsibilities**

- 28.4.1. The CFO is responsible for activating the Financial Business Continuity Plan (FBCP) and liaising with the CEO and Chair of FARA.
- 28.4.2. The Financial Controller acts as deputy lead and ensures continuity arrangements for payroll, banking, and core transaction processing.
- 28.4.3. Budget holders and Headteachers must follow contingency instructions during disruption.

28.5. **Continuity Arrangements**

- 28.5.1. Cloud-based financial systems (Sage Intacct, banking portals) allow remote access via secure VPN and multi-factor authentication.
- 28.5.2. Daily automated backups are maintained, with off-site data storage in compliance with UK GDPR.
- 28.5.3. Key process guides for payroll, supplier payments, and banking are stored securely on the Trust's SharePoint system and accessible remotely to authorised staff.
- 28.5.4. Where finance staff are unavailable, cross-trained staff within the central team will assume key duties, supported by external payroll providers and banking relationship managers.
- 28.5.5. If the main office is inaccessible, financial operations will be relocated to a designated alternative site or operated fully remotely.

28.6. **Contingency Funding**

- 28.6.1. The Trust will maintain a contingency fund within its reserves in line with the Reserves Policy to cover emergency expenditure.
- 28.6.2. The CFO may authorise emergency spend up to £20,000 without prior Board approval, provided it is reported at the next Board meeting.

28.7. **Testing and Review**

- 28.7.1. The financial continuity plan will be tested annually through a desk-based scenario exercise.
- 28.7.2. Lessons learned will be incorporated into updated procedures.
- 28.7.3. The CFO will review the plan annually.

28.8. **Link to Risk Management**

28.8.1. Continuity risks and mitigating actions will be recorded in the Strategic Risk Register and reviewed by FARA at least termly.

29. Training Requests and Repayment of Training Costs

29.1. Purpose

- 29.1.1. The Trust is committed to supporting the professional development of all employees through training and learning opportunities that improve skills, knowledge, and performance, and which support the Trust's strategic priorities.
- 29.1.2. This section sets out the approval process for training requests and the circumstances in which employees may be required to repay training costs if they leave the Trust within a defined period after completing the training.

29.2. Training Requests

- 29.2.1. All training requests must be submitted in writing to the employee's line manager using an appropriate Training Request Form, including:
 - 29.2.1.1. Details of the course and provider.
 - 29.2.1.2. Dates and location of the training.
 - 29.2.1.3. Full costs, including course fees, travel, accommodation, and subsistence (if applicable).
 - 29.2.1.4. Justification for how the training supports the employee's role and the Trust's priorities.
- 29.2.2. All training requests will be reviewed in the context of budget availability, operational requirements, and strategic alignment.
- 29.2.3. The Headteacher or CFO must authorise any training expenditure over £250.

29.3. Repayment of Training Costs

- 29.3.1. The Trust reserves the right to require repayment of certain training costs if an employee voluntarily resigns or otherwise leaves the Trust's employment within **two years** of completing the training.
- 29.3.2. Repayment will apply to:
 - 29.3.2.1. Non-statutory training courses costing over £250.
 - 29.3.2.2. Statutory or mandatory training undertaken because the employee applied for, and was appointed to, a role that required the qualification or training, and then leaves soon after completion (for example, a newly promoted teacher completing SENCO training and leaving soon after qualification).
- 29.3.3. Repayment will **not** apply to:
 - 29.3.3.1. Statutory or mandatory training required for the employee's existing role (e.g. safeguarding, first aid).
 - 29.3.3.2. Training funded entirely by an external body or grant.
 - 29.3.3.3. Where the employee leaves due to **redundancy**, ill-health retirement, or other circumstances agreed by the CEO and CFO as beyond the employee's control.

29.4. Repayment Schedule

- 29.4.1. The repayment percentage is based on the time between the training completion date and the employee's last working day:
 - 29.4.1.1. **Within first 12 months:** 100% of training costs.
 - 29.4.1.2. **13–18 months after completion:** 75% of training costs.
 - 29.4.1.3. **19–24 months after completion:** 50% of training costs.
 - 29.4.1.4. **After 24 months:** No repayment required.

29.5. Payment Method

- 29.5.1. Any repayment due will normally be deducted from the employee's **final salary after tax**.

- 29.5.2. Where the final salary is insufficient to cover the repayment, the Trust will issue an invoice for the balance, payable within 28 days.
- 29.5.3. If repayment is not made, the Trust may take recovery action, which may include legal proceedings.

29.6. **Agreement to Repayment Term**

- 29.6.1. Before booking, the employee should agree to a **Training Repayment Agreement** confirming that they have read and understood this policy section and agree to repay costs in line with the repayment schedule if they leave within two years.
- 29.6.2. A copy of the signed agreement will be kept in the employee's personnel file.
- 29.6.3. Where a delegated budget holder authorises training without obtaining a signed Training Repayment Agreement, they should be able to clearly evidence:
 - 29.6.3.1. The reasons for proceeding without the agreement.
 - 29.6.3.2. Why repayment safeguards were deemed unnecessary or inappropriate in the specific case.
 - 29.6.3.3. Whether an alternative written waiver or condition was sought from the employee.
- 29.6.4. In such cases, the decision and rationale should be documented in writing and submitted to the CFO for review before the training is booked.

29.7. **Discretion**

- 29.7.1. The CEO and CFO may, in exceptional circumstances, waive or reduce the repayment requirement, for example in cases of redundancy, ill-health retirement, or other compassionate grounds.

30. **Estates Strategy**

30.1. **Overview**

30.1.1. South Cumbria Multi-Academy Trust (SCMAT) recognises that its estate is a critical enabler of educational success, safeguarding, and community value. The Trust is committed to ensuring all premises are maintained to a high standard, providing a safe, secure, hygienic, and inspiring environment for pupils, staff, and visitors. The estate will be managed in line with the Academy Trust Handbook 2025, Department for Education (DfE) Good Estate Management for Schools (GEMS) guidance, statutory health and safety legislation, and sustainability commitments.

30.2. **Objectives**

30.2.1. The Trust's key objectives for estate management are:

30.2.1.1. To ensure that all Trust sites are safe, secure, and compliant with legislation.

30.2.1.2. To provide a well-maintained, clean, and welcoming environment that enhances teaching, learning, and well-being.

30.2.1.3. To maintain and develop the estate so it is fit for purpose and able to adapt to future curriculum and pupil needs.

30.2.1.4. To ensure accessibility for pupils, staff, and visitors with special needs or disabilities, in line with the Equality Act 2010.

30.2.1.5. To manage estate-related risks, including during new build or refurbishment programmes.

30.2.1.6. To deliver value for money in premises management, ensuring efficient and effective use of resources.

30.2.1.7. To promote environmental sustainability, including energy efficiency, conservation, and carbon reduction.

30.2.1.8. To embed a culture of proactive maintenance, reducing reliance on reactive repairs.

30.2.1.9. To ensure that estate management supports safeguarding and emergency preparedness.

30.2.1.10. To engage staff, pupils, and community users in creating attractive, safe, and sustainable environments.

30.3. **Strategies**

30.3.1. The Trust will achieve these objectives through the following strategies:

30.3.1.1. **Monitoring and Compliance:** Daily site checks, termly health and safety inspections, and regular audits against statutory and regulatory requirements.

30.3.1.2. **Planned Maintenance:** Development of a rolling condition survey and planned preventative maintenance (PPM) programme to prioritise resources effectively.

30.3.1.3. **Budgeting:** Allocation of appropriate budgets for maintenance, health and safety, and capital improvement, informed by the Trust's Reserves and Capital Plans.

30.3.1.4. **Risk Management:** Site-specific risk assessments, including fire safety, asbestos management, water hygiene (e.g., Legionella), security, and emergency planning.

30.3.1.5. **Cleaning and Hygiene:** Ensuring all sites meet high standards of cleanliness and infection control, with monitoring of cleaning contracts and in-house provision.

30.3.1.6. **Equipment and Compliance Testing:** Regular statutory inspection and servicing of plant, machinery, and equipment (e.g., PAT testing, gas safety, lifts, playground equipment).

30.3.1.7. **Training and Competence:** Ensuring relevant staff receive training in health and safety, first aid, fire warden duties, and estate compliance.

30.3.1.8. **Emergency Preparedness:** Regularly testing evacuation, lockdown, and emergency response procedures.

- 30.3.1.9. Contractor and Visitor Controls:** Ensuring all contractors are appropriately certified, insured, and inducted, with clear safeguarding and identity protocols.
- 30.3.1.10. Sustainability and Net Zero:** Integrating energy efficiency, renewable technologies, recycling, biodiversity, and climate resilience into estate planning.

30.4. Outcomes

- 30.4.1.** Through the delivery of this strategy, SCMAT will:
 - 30.4.1.1.** Provide an estate that is safe, welcoming, and supportive of outstanding teaching and learning.
 - 30.4.1.2.** Maintain compliance with all statutory, regulatory, and funding body requirements.
 - 30.4.1.3.** Deliver value for money in estate operations and investment.
 - 30.4.1.4.** Ensure the estate supports inclusion, accessibility, and community engagement.
 - 30.4.1.5.** Contribute to environmental sustainability and the Trust's long-term resilience.

31. Pay Policy Statement Support Staff

31.1. Scope and statutory basis

31.1.1. This section applies to all support staff employed by the Trust on NJC (Green Book) terms and conditions. For avoidance of doubt this is all staff not on teachers terms and conditions.

31.1.2. The Trust adopts the **Westmorland & Furness Council** NJC job-evaluation framework, pay structure and any nationally agreed NJC cost-of-living awards. The local pay spine published by Westmorland & Furness Council is the Trust's reference pay spine for support roles.

31.2. Pay structure and job evaluation

31.2.1. Roles are typically graded via NJC job evaluation into job families and levels. Grades normally have two spinal column points (Level A and Level B). New starters are normally appointed on **Level A** of the grade.

31.2.2. Progression to **Level B** is based on satisfactory performance and meeting role competencies, normally no earlier than 6 months after appointment.

31.2.3. Where job working circumstances (JWC) (emotional/physical demands or working conditions) apply, evaluation points may increase the final grade, in line with NJC methodology.

31.3. Annual pay review

31.3.1. Support staff basic pay is reviewed annually on the implementation of national NJC awards and any local spine updates issued by Westmorland & Furness Council.

31.4. Starting salaries and market supplements

31.4.1. Starting salary is normally Level A of the evaluated grade. A higher entry point may be offered where skills/experience justify it.

31.4.2. **Market supplements** may be used, exceptionally, for hard-to-recruit roles where robust external evidence justifies a temporary uplift. Supplements are time-limited, reviewed at least annually, and separated from basic pay to protect equal pay compliance.

31.5. Progression, regrading and role change

31.5.1. Movement from Level A to Level B within the same grade is based on satisfactory performance and meeting role standards; it is not automatic by time alone.

31.5.2. Where duties change substantially and permanently, the role will be re-evaluated. Outcomes may confirm the existing grade or lead to regrading.

31.5.3. **Acting-up** (covering a higher-graded post fully) is paid at the minimum of the higher grade for the period of cover.

31.5.4. **Additional responsibility** payments may apply where a significant portion of higher-graded duties is undertaken alongside the substantive role.

31.5.5. **Honoraria** may recognise exceptional one-off contributions (subject to approvals).

31.6. Working time and additional hours

31.6.1. The standard full-time working week is **37 hours**. Normal working hours fall within 07:00–19:00 Monday–Saturday, subject to service needs. Flexi-time may apply locally.

31.6.2. Additional hours above 37 per week are payable for staff **up to Grade 9** (and for part-time staff up to 37 hours), unless otherwise agreed for operational reasons. Overtime to be pre-authorised and recorded.

31.7. Allowances (where applicable)

- 31.7.1. Standby: paid per published rota/allowance where staff are required to remain available for work outside core hours; call-out time is paid in addition.
- 31.7.2. Flat sessional supplements may apply for night, Sunday and bank holiday working, in line with the current local scheme.
- 31.7.3. Business mileage is reimbursed at HMRC rates; local car-user lump-sum/mileage may apply where designated. (See Staff Expenses section.)

31.7.4. Pension

- 31.7.5. Eligible support staff are enrolled in the **Local Government Pension Scheme (LGPS)** under automatic enrolment rules.

31.8. Annual leave and public holidays

- 31.8.1. Annual leave entitlements mirrors the council scheme.

- 31.8.1.1. 0 Years Service or Continuous Service: 25 days
- 31.8.1.2. 2 Years Service or Continuous Service: 26 days
- 31.8.1.3. 3 Years Service or Continuous Service: 28 days
- 31.8.1.4. 4 Years Service or Continuous Service: 30 days
- 31.8.1.5. 5 Years Service or Continuous Service: 31 days
- 31.8.1.6. Plus 8 bank / public holidays
- 31.8.2. Contractual annual leave for NJC staff is set by continuous local government service, and increases with service.
- 31.8.3. TTO staff receive the same pro-rata entitlement as full-year staff, expressed in hours/days and deemed taken during school closure periods.
- 31.8.4. Public/bank holidays are either additional (pro-rata) or included within AL depending on the Council's scheme in force; the Trust follows the Council approach for consistency.
- 31.8.5. Term-time leave is normally not permitted, unless contractually specified. Exceptionally, pre-approved leave in term time may be agreed for service needs and will be recorded/offset appropriately.
- 31.8.6. All leave must be approved in advance.

31.9. Term-Time Only (TTO) pay and leave entitlement

- 31.9.1. What "term-time only" means
 - 31.9.1.1. Working weeks (WW): the number of weeks in which the employee is required to work on site/in role (e.g., 38, 39, 40 or 41 weeks).
 - 31.9.1.2. Annual leave (AL): contractual annual leave entitlement under NJC/Green Book pro-rated for the employee's hours and weeks. For TTO roles, AL is deemed to be taken during school closure periods (unless service needs require otherwise).
 - 31.9.1.3. Public/bank holidays (BH): paid pro-rata in line with local arrangements and the employee's working pattern; normally included within the annualised calculation for TTO staff.
 - 31.9.1.4. TTO staff are paid over 12 equal monthly instalments (annualised pay), even though they do not work every week of the year.

31.9.2. Principles

- 31.9.2.1. TTO pay = pro-rata of the full-time equivalent (FTE) salary using a paid-weeks multiplier.
- 31.9.2.2. Paid weeks = WW + (AL in weeks, pro-rata) + (BH in weeks, pro-rata) — unless your local scheme includes BH within AL, in which case do not add BH separately.
- 31.9.2.3. For fairness, calculate AL and BH in hours (or days) based on the employee's contracted hours per week and days per week, then convert to weeks.

31.9.2.4. Leave cannot usually be taken in term time (except by prior agreement for service needs). Leave is **not “lost”** for TTO staff; it is included in the paid-weeks calculation.

31.9.3. The calculation (step-by-step)

31.9.3.1. Inputs

31.9.3.1.1. FTE annual salary for the grade (full year, 37 hours, 52.143 weeks).

31.9.3.1.2. Contracted weekly hours (H) and days per week (D).

31.9.3.1.3. Working weeks (WW).

31.9.3.1.4. Contractual annual leave entitlement for full-year staff at that grade and service (AL_full in **days** or **hours**).

31.9.3.1.5. Local rule on public holidays: **additional** to AL, or **included** within AL

31.9.4. Steps

31.9.4.1. Pro-rate annual leave for the TTO pattern:

31.9.4.1.1. Convert AL_full to hours (if not already).

31.9.4.1.2. $AL_pro-rata_hours = AL_full_hours \times (H \div 37) \times (WW \div 52.143)$.

31.9.4.1.3. Convert AL_pro-rata_hours to weeks: $AL_weeks = AL_pro-rata_hours \div (H \times 1 \text{ week})$.

31.9.4.2. Public holidays (if additional to AL):

31.9.4.2.1. $BH_days_pro-rata = (\text{number of annual Mon–Fri public holidays locally}) \times (D \div 5) \times (WW \div 52.143)$.

31.9.4.2.2. $BH_weeks = BH_days_pro-rata \div D$.

31.9.4.3. Paid weeks (PW)

31.9.4.3.1. $PW = WW + AL_weeks + BH_weeks$.

31.9.4.4. TTO fraction

31.9.4.4.1. $TTO_fraction = PW \div 52.143$.

31.9.4.5. Annualised salary

31.9.4.5.1. $\text{Annualised pay} = \text{FTE salary} \times TTO_fraction \times (H \div 37)$.

31.9.4.5.2. $\text{Monthly pay} = \text{Annualised pay} \div 12$.

31.9.4.6. Example (Contractual AL 25 days + 8 BH additional, 39-week post, 30h/week over 5 days)

31.9.4.6.1. FTE salary = £26,000; WW = 39; H = 30; D = 5.

31.9.4.6.2. Full-year AL = **25 days** (5 weeks) **plus 8 BH days** (1.6 weeks).

31.9.4.6.3. $AL_weeks_pro-rata = 5.0 \times (WW \div 52.143) = 5.0 \times 0.748 \approx \mathbf{3.74 \text{ weeks}}$.

31.9.4.6.4. $BH_weeks_pro-rata = 1.6 \times (WW \div 52.143) = 1.6 \times 0.748 \approx \mathbf{1.20 \text{ weeks}}$.

31.9.4.6.5. $PW = 39 + 3.74 + 1.20 = \mathbf{43.94 \text{ weeks}}$.

31.9.4.6.6. $TTO_fraction = 43.94 \div 52.143 \approx \mathbf{0.843}$.

31.9.4.6.7. $\text{Hours factor} = H \div 37 = 30/37 \approx \mathbf{0.811}$.

31.9.4.6.8. $\text{Annualised pay} = £26,000 \times 0.843 \times 0.811 \approx \mathbf{£17,770} \rightarrow \text{monthly} \approx \mathbf{£1,481}$.

31.10. Pay protection

31.11. Where a post is downgraded following organisational change, salary safeguarding/pay protection will be applied depending upon the role and position.

31.12. Support staff pay spine (summary)

31.13. The Trust adopts the Westmorland & Furness Council Pay and Grading Structure (below).

31.14. The current published spine shows graded pay with Level A and Level B points, aligned to NJC SCPs (including application of the UK Living Wage where relevant) together with spot point for FTE COFO.

Grade	Grade Level A or B	New SCP	Lookup Grade	Basic Salary 01/04/2025
				£pa
App	App	App	App	12,888.32
1	B	P1	B	-
2	A	P1	A	-
	B	P2	B	24,412.99
3	A	P3	A	24,795.86
	B	P4	B	25,184.93
4	A&B	P5	A&B	25,583.28
5	A&B	P6	A&B	25,988.86
6	A	P7	A	26,402.69
	B	P8	B	26,823.74
7	A	P12	A	28,597.75
	B	P14	B	29,539.97
8	A	P19	A	32,061.14
	B	P20	B	32,596.75
9	A	P23	A	34,433.71
	B	P24	B	35,412.05
10	A	P25	A	36,362.52
	B	P26	B	37,279.97
11	A	P27	A	38,220.12
	B	P28	B	39,152.02
12	A	P30	A	40,777.42
	B	P31	B	41,771.23
13	A	P32	A	42,839.35
	B	P33	B	44,074.66
14	A	P34	A	45,091.18
	B	P35	B	46,141.75
15	A	P36	A	47,180.98
	B	P37	B	48,226.39
16	A	P40	A	51,356.45
	B	P41	B	52,413.22
17	A	P45	A	56,740.39
	B	P47	B	58,914.82
18	A	P52	A	65,183.18
	B	P54	B	67,909.73
19	A	P61	A	79,436.14
	B	P63	B	82,144.10
2	A	P1	A	-
	B	P2LW	B	25,086.89
3	A	P3LW	A	25,086.89
	B	P4LW	B	25,184.93

32. Pay Policy Statement Teachers

32.1. Purpose and scope

32.1.1. This section sets the framework for determining teachers' pay, in accordance with the **School Teachers' Pay and Conditions Document (STPCD)** and all applicable legislation.

32.1.2. It applies to all teachers employed by the Trust, including centrally-employed teachers.

32.2. Principles

32.2.1. The Trust's aims are to: assure high-quality teaching and learning; support recruitment and retention; reward fairly and lawfully; and ensure accountability, transparency, objectivity and equality of opportunity.

32.2.2. Decisions will align with the **Scheme of Delegation**: the Board (or delegated Committee) determines the policy and ranges; Headteachers/line managers make recommendations; the Committee determines pay; appeals are heard by an Appeals Committee.

32.3. Pay reviews and statements

32.3.1. Each teacher's salary is reviewed annually with effect from **1 September** and no later than **31 October** (or **31 December** for headteachers). Written pay statements are issued by **30 November** or earlier if STPCD publication is delayed.

32.3.2. Reviews may occur at other times where duties change. Where safeguarding may arise, statutory notifications will be issued promptly.

32.4. Determining pay on appointment

32.4.1. Prior to advertising, the Trust sets the pay range for the vacancy. On appointment, the starting salary is set **within the advertised range** with regard to the post, required qualifications/skills/experience, and recruitment/retention needs.

32.4.2. Teachers are not appointed to a different national range (MPR/UPR/UNQ) from their previous range unless the vacancy is explicitly on a different range and the teacher applies for that post. Leadership appointments follow STPCD rules.

32.5. Appraisal-linked progression

32.5.1. All teachers receive annual appraisal. Progression is automatic (unless the teacher is in formal capability and this enables a progression pause).

32.5.2. Where performance significantly exceeds expectations, the reviewer may recommend **enhanced** progression (where permitted).

32.5.3. ECTs progress in line with the statutory two-year induction; ECTs are eligible for progression at the end of Year 1 under this policy.

32.5.4. Budget provision must reflect expected progression.

32.6. Pay ranges (headline minima/maxima)

32.6.1. Main Pay Range (MPR) from 1 Sept 2025: £32,916 – £45,352.

32.6.2. Upper Pay Range (UPR) from 1 Sept 2025: £47,472 – £51,048.

32.6.3. Leadership Range: £51,773 – £143,796 (appointments set with regard to headteacher group calculations and STPCD guidance).

32.6.4. Lead Practitioner Range: £52,026 – £79,092.

32.6.5. Unqualified Teacher Range: £22,601 – £35,259.

32.7. Movement to and on the UPR

32.7.1. Any qualified teacher may apply annually to move to UPR.

- 32.7.2. Evidence is the last two completed appraisal cycles.
- 32.7.3. The criteria are continued competence against the Teachers' Standards and a substantial and sustained contribution to the wider school.
- 32.7.4. Successful applicants are placed on UPR (normally UPR1) from 1 September of the year of application; clear feedback is provided for unsuccessful applications. Progression within UPR is automatic (unless the teacher is in formal capability and this enables a progression pause).

- 32.8. Part-time and short-notice teachers**
- 32.8.1. Part-time teachers are paid pro-rata in accordance with STPCD paragraphs on part-time service.
- 32.8.2. Short-notice/supply teachers are paid on a daily or hourly basis as defined in STPCD.

- 32.9. Allowances and additional payments**
- 32.9.1. **TLR 1/2/3** may be awarded for substantial additional responsibilities meeting STPCD criteria.
- 32.9.2. **SEN allowance** is paid where STPCD criteria are met.
- 32.9.3. **Unqualified teacher allowance** may be paid where duties/skills warrant it (within STPCD limits).
- 32.9.4. Discretionary payments may be made for agreed CPD outside directed time, ITT, out-of-school learning, and the provision of services to other schools (as permitted).
- 32.9.5. **Recruitment & Retention** incentives/benefits may be used with defined duration/review/end dates. Leadership teachers are excluded except for relocation/housing cost reimbursements on appointment (as per STPCD).

- 32.10. Salary safeguarding (pay protection)**
- 32.10.1. The Trust applies STPCD safeguarding (normally up to three years) where statutory criteria are met, for teachers whose pay is reduced due to organisational change.

- 32.11. Appeals**
- 32.11.1. Teachers may appeal pay decision. Stages include informal discussion, formal representation to the decision-making committee.

32.12. Leadership Pay Range – 2025

Pay Point	Salary
1	£51,773
2	£53,069
3	£54,394
4	£55,747
5	£57,137
6	£58,569
7	£60,145
8	£61,534
9	£63,070
10	£64,691
11	£66,368
12	£67,898
13	£69,596
14	£71,330
15	£73,105
16	£75,049
17	£76,772
18	£78,702
19	£80,655
20	£82,654
21	£84,699
22	£86,803
23	£88,951
24	£91,158
25	£93,424
26	£95,735
27	£98,106
28	£100,540
29	£103,030
30	£105,595
31	£108,202
32	£110,892
33	£113,646
34	£116,456
35	£119,350
36	£122,306
37	£125,345
38	£128,447
39	£131,578
40	£134,860
41	£138,230
42	£141,693
43	£143,796

32.13. Lead Practitioner Pay Range

Pay Point	Salary
1	£52,026
2	£53,332
3	£54,663
4	£56,022
5	£57,418
6	£58,857
7	£60,443
8	£61,836
9	£63,381
10	£65,010
11	£66,695
12	£68,233
13	£69,937
14	£71,682
15	£73,465
16	£75,419
17	£77,150
18	£79,092

32.14. Main Pay Range

Pay Point	Salary
1	£32,916
2	£34,823
3	£37,101
4	£39,556
5	£42,057
6	£45,352

32.15. Unqualified Teacher Pay Range

Pay Point	Salary
1	£47,472
2	£49,232
3	£51,048

32.16. Upper Pay Range

Pay Point	Salary
1	£47,472
2	£49,232
3	£51,048

32.17. SEN Allowance

SEN Allowance	
SEN 1	£2,787
SEN 2	£5,497

32.18. TLR Ranges

STPCD 2025 – TLR Ranges		
Band	Minimum	Maximum
TLR Band 1	£10,174	£17,216
TLR Band 2	£3,527	£8,611
TLR Band 3	£702	£3,478

33. Maternity Pay

33.1. Purpose

33.1.1. This section sets out the Trust's framework for maternity, paternity, adoption, and parental leave in line with statutory requirements, the School Teachers' Pay and Conditions Document (STPCD), the Green Book, and Burgundy Book provisions. It ensures compliance with UK legislation, including the Employment Rights Act 1996, Equality Act 2010, and Working Time Regulations.

33.2. Principles

33.2.1. All employees will be treated fairly and without discrimination for requesting or taking family leave.

33.2.2. Terms and conditions (except pay) continue during family leave, including continuity of service and pension accrual.

33.2.3. Annual leave entitlement continues to accrue during periods of maternity, adoption, and shared parental leave.

33.2.4. Employees are encouraged to return to work following family leave and will be supported with flexible working requests where possible.

33.2.5. Staff will not suffer detriment for exercising these rights.

33.3. Maternity Leave

33.3.1. Eligibility: All employees are entitled to up to 52 weeks' maternity leave (26 weeks Ordinary Maternity Leave + 26 weeks Additional Maternity Leave), regardless of length of service.

33.3.2. Pay:

33.3.2.1. Statutory Maternity Pay (SMP): up to 39 weeks (6 weeks at 90% of average weekly earnings, then 33 weeks at the statutory rate or 90% of average earnings if lower).

33.3.2.2. Occupational Maternity Pay: additional entitlements may apply depending on length of service (e.g. 4 weeks full pay, 2 weeks at 90%, then 12 weeks half pay + SMP under the Burgundy Book for teachers).

33.3.3. Compulsory leave: Employees must not work for 2 weeks immediately following childbirth.

33.3.4. Notification: Employees must notify their Headteacher/line manager by the 15th week before the expected week of childbirth with their MATB1 form and intended leave start date.

33.4. Adoption Leave

33.4.1. Eligibility: One primary adopter is entitled to up to 52 weeks' leave (26 weeks Ordinary Adoption Leave + 26 weeks Additional Adoption Leave). Applies equally to overseas adoptions and surrogacy arrangements where a parental order is sought.

33.4.2. Pay:

33.4.2.1. Statutory Adoption Pay (SAP): up to 39 weeks (same structure as SMP).

33.4.2.2. Occupational Adoption Pay: additional enhancements for eligible staff under Green and Burgundy Book conditions.

33.4.3. Notification: Employees must notify their Headteacher/line manager within 7 days of being matched with a child and provide a Matching Certificate.

33.5. Paternity Leave and Maternity Support Leave

33.5.1. Eligibility: Fathers, partners, civil partners, or nominated carers are entitled to:

33.5.1.1. 5 days' paid Maternity Support Leave at full pay (pro rata for part-time staff).

- 33.5.1.2. Up to 2 weeks' Statutory Paternity Leave (SPP), paid at the statutory rate or 90% of average weekly earnings (if lower), to be taken within 56 days of the birth or placement.
- 33.5.2. Notification: At least 15 weeks before the expected week of childbirth or within 7 days of adoption match.

33.6. Shared Parental Leave (SPL)

- 33.6.1. Eligibility: Parents can share up to 50 weeks' leave and 37 weeks' pay if the mother or adopter ends maternity or adoption leave/pay early.
- 33.6.2. Pay: Statutory Shared Parental Pay (ShPP) at the statutory rate for up to 37 weeks.
- 33.6.3. Notification: Minimum 8 weeks' notice required, with formal declaration of intent.
- 33.7. Parental Leave (Unpaid)
- 33.7.1. Eligibility: Employees with 1 year's continuous service and parental responsibility for a child are entitled to up to 18 weeks' unpaid leave per child, up to their 18th birthday.
- 33.7.2. Usage: Maximum of 4 weeks per year per child (unless the child has a disability, where leave may be taken in single days).
- 33.7.3. Notice: 21 days.

33.8. Keeping in Touch (KIT) Days

- 33.8.1. Employees on maternity/adoption leave may agree up to 10 KIT days.
- 33.8.2. Employees on shared parental leave may agree up to 20 SPLIT days.
- 33.8.3. KIT days are optional, must be agreed by both parties, and paid at contractual pay (topped up above SMP/SAP/ShPP where applicable).

33.9. Return to Work

- 33.9.1. Employees have the right to return to the same job following ordinary maternity, adoption, or paternity leave.
- 33.9.2. After additional maternity, adoption, or SPL, if the original job is not reasonably practicable, a similar role on equivalent terms must be offered.
- 33.9.3. Early return requires at least 7 days' notice (ordinary leave) or 21 days' notice (additional leave).

33.10. Repayment of Occupational Pay

- 33.10.1. Where an employee receives occupational maternity, adoption, or shared parental pay but does not return to work for at least 3 months, the Trust reserves the right to recover the additional half pay element.
- 33.10.2. Repayment will not be required where the employee is made redundant.

33.11. Health and Safety

- 33.11.1. Risk assessments must be conducted for pregnant employees.
- 33.11.2. Adjustments or maternity suspension on full pay may be required if work presents a health risk.

33.12. Governance

- 33.12.1. Entitlements and pay levels will be updated annually to reflect statutory changes and the STPCD/Green Book provisions.
- 33.12.2. Managers must seek HR advice before authorising any family leave arrangements.

Appendix 1: Common Staff Finance & Resources FAQ

No.	Question	Answer	Reference
Payroll & Pay			
1	How do I check my pay?	Via monthly payslip from payroll provider. Report discrepancies immediately.	6.4.4–6.4.5
2	Who is responsible for ensuring my tax code is correct?	Each employee must check and contact HMRC directly if wrong.	6.4.7
3	Who ensures my pension contributions are correct?	Payroll processes deductions; staff must check payslips.	6.4.3
4	What should I do if I think I have been overpaid?	Notify Finance Team immediately. Overpayments must be repaid.	6.4.5
5	What should I do if I think I have been underpaid?	Report to Finance Team for payroll investigation.	6.4.6
6	Who is responsible for making sure my pay is correct?	Trust ensures payroll accuracy, but staff must check payslips.	6.4.5–6.4.6
7	How are contracts of employment amended?	Authorised by CEO/CFO/HTs and processed by HR/Payroll.	6.2.2–6.2.4
8	Who approves new staff appointments?	CEO and CFO for central; HTs for schools; Board for leadership posts.	2.4–2.6
Training & Development			
9	What happens if I resign before training the Trust has paid for?	Repayment may apply for non-statutory training >£250 if leaving within 2 years.	29.3–29.4
10	How much do I repay if I leave after training?	100% <12mths, 75% 12–18mths, 50% 18–24mths, none after.	29.4
11	Do I need to sign anything before attending training?	Yes. A Training Repayment Agreement if subject to repayment.	29.6
12	Will I repay training if I am made redundant?	No. Repayment does not apply.	29.5
Records & Retention			
13	How long are personnel files kept after leaving?	Six years.	26.1
14	How long are finance records kept?	Six years minimum (HMRC).	3.1.4
15	How are old records destroyed?	Secure shredding or verified deletion.	26.5
Expenses, Welfare & Hospitality			
16	What happens if I lose a receipt for expenses?	Claims without receipts will not normally be reimbursed.	11.2.3

17	Can I approve my own expenses?	No. Must be authorised by an approved signatory, considering segregation of duty.	22.3.5
18	Can staff use school funds for personal gifts?	No. Only approved welfare/long service awards permitted.	11.2
19	What is the staff welfare budget?	£200 per staff member per occasion, authorised by CEO/CFO with HTs.	11.1
20	Can school funds top up staff collections (e.g. birthdays)?	No. Voluntary staff collections only.	11.2.2
Petty Cash & Cash Handling			
21	Can petty cash be used for personal items?	No. Only for authorised school purchases.	16.6.3
22	What is the petty cash limit?	£500 per school; individual claims ≤£50 unless authorised.	16.6.1–16.6.3
23	Who authorises use of petty cash?	HTs or CFO/Financial Controller.	16.6.3.1
Purchasing & Procurement			
24	Who approves supplier invoices?	Financial Controller, CFO, CEO or HTs (for no-order invoices).	7.13
25	What if a supplier changes their bank details?	Must be verified by contacting supplier using existing records.	10.3.7
26	Who manages supplier contracts?	CFO, focusing on best value arrangements.	10.1–10.2
27	How are new suppliers approved?	Finance Team checks documentation, CFO/Financial Controller authorises.	10.3
28	As a supplier, should I agree to supply goods/services without an official order?	No. All requests should be accompanied by an official purchase order, you operate at risk without official approval	7.3–7.4
29	As a supplier, how quickly will I get paid?	Standard terms are 30 days from receipt of a valid invoice.	7.13–7.14
30	What documents must suppliers provide when set up?	Bank details, Companies House number, VAT number, insurance certificates, DBS where relevant.	10.3.2–10.3.3
Trips, Visits & Income			
31	Who approves trips and visits?	HTs and CFO (depending on cost).	14.4.2
32	How are trip payments made by parents?	Online (Lunch Shop) or, exceptionally, cash with receipt.	14.4.5
33	What happens if a trip makes a surplus?	Surplus >£10 per pupil reimbursed to parents.	14.4.7
34	Can staff book a trip before receiving parent contributions?	Yes. However, cancellation terms should be favourable and payments should be received promptly.	14.4.8
35	Who chases unpaid trip money?	Lead Teacher running the trip.	14.4.6

36	What insurance covers trips?	Trust insurance; Lead Teacher must confirm details.	19.1–19.3; 14.4.9
Insurance			
37	Does Trust insurance cover staff belongings?	No. Only Trust property insured.	19.1
38	What insurance must contractors have?	Public liability cover ≥£5m.	19.4
39	What insurance must hirers of school premises have?	Either covered under school insurance (extra cost) or own £5m cover.	19.5
Risk & Governance			
40	Who sets the Trust's risk appetite?	Trust Board, reviewed annually.	24.4
41	How do I report a risk I identify?	To HT or line manager; escalated to CFO/CEO if significant.	24.5
42	Can a HT override the Finance Policy?	No. Compliance with Trust policy is mandatory.	1.8
43	Who monitors compliance with this policy?	CFO, CEO (AO), and FARA Committee with Board oversight.	1.7
44	What happens if staff breach this policy?	Must be reported to CFO; may escalate to CEO/Board.	1.8
45	How often is this policy reviewed?	Annually by Board or FARA.	1.7
46	What are the Nolan Principles I must follow?	Selflessness, integrity, objectivity, accountability, openness, honesty, leadership.	Intro
47	Where do I report concerns about fraud/wrongdoing?	Via Whistleblowing Policy or to CFO/CEO.	1.6; 25
Severance & Debts			
48	Who approves severance payments?	CEO (≤£50k with legal advice); >£50k requires DfE/Board approval.	6.5–6.7
49	Are severance payments allowed for misconduct?	No, unless legal advice confirms tribunal claim likely.	6.2
50	Who can write off debts?	CFO ≤£1k; >£1k requires FARA approval.	15.7
51	What happens if parents don't pay debts?	Reminders and final demands issued; debts may go to collectors.	15.2–15.6
Banking & Cashflow			
52	Who manages bank reconciliations?	Finance Assistant prepares; CFO reviews monthly.	16.5
53	Who can sign cheques or authorise payments?	CEO, CFO, HTs, Financial Controller, or MAT Chair (two required).	16.4

54	How often are cash deposits banked?	Weekly, or sooner if insurance limits exceeded.	16.1
Charge Cards			
55	Who manages charge cards?	CFO. Cardholders are responsible for 'their' cards. Cardholders must reconcile monthly.	9.4–9.6
56	Can I use a charge card for personal purchases?	No. Cards strictly for Trust business.	9.6.5
57	What happens if I misuse a charge card?	Costs will be recovered, possibly via salary deduction.	9.6.7–9.6.8
58	Do I need a VAT receipt for card purchases?	Yes, always.	9.6.9
Governors & Directors			
59	Are governors paid allowances?	Governors may claim necessary expenses, not attendance allowances.	22.1–22.2
60	What evidence is needed for governor expenses?	Receipts required; only actual costs reimbursed.	22.4
61	What mileage rate is used for travel claims?	HMRC approved rates.	22.9
62	Who approves governor expenses?	CFO, reported to FARA.	22.7
General			
63	What if regulations conflict with this policy?	Regulatory requirement takes precedence; escalate to CFO/CEO.	Intro
64	How quickly will I be paid as a supplier?	30 days from receipt of valid invoice.	7.13–7.14

Appendix 2: Payroll Responsibilities – School vs Provider

Area	School Responsibility	Provider (Payroll Contractor) Responsibility
Starters	Complete pre-employment checks. Submit new appointment details by deadline.	Set up HR/Payroll record, salary and contract. Process deductions. Notify HMRC and Pensions. Issue contract of employment.
Contract Changes	Submit authorised contract variation (e.g. hours, grade). Notify of policy changes at planning stage.	Produce variation letters/contracts. Adjust payroll system. Implement system/policy changes as agreed.
Leavers	Submit leaver details and any outstanding payments by deadline.	Process leaver, final pay, pension tasks. Recover overpayments from final salary.
Absence	Submit sickness/other leave. Send half-pay/nil-pay letters. Notify of return from absence.	Process absence records. Provide half-pay/nil-pay reports and letters. Update payroll system.
Maternity/Adoption/Parental Leave	Submit leave details. Notify provider of return dates. Pass on employee requests re pension contributions.	Produce statutory letters. Calculate and process statutory benefits. Update system and notify LGPS.
Payments	Submit overtime, expenses, allowances, honoraria, settlement agreements by deadlines.	Process payments. Apply deductions. Produce advance payments if authorised.
Annual Pay Awards	Submit agreed pay award details.	Implement pay award in next payroll.
Attachments of Earnings / HMRC Notices	Forward court orders, tax code or student loan notices promptly.	Process orders and notifications in payroll system by statutory deadline.
Overpayments	Notify provider immediately. Ensure employee informs school if incorrect pay.	Issue overpayment letters, repayment schedules, or recover via payroll.
Payroll Verification	Check payroll summary reports (bank details, totals, exceptions) and confirm within 48 hours.	Process validation reports, correct errors, run payroll if school verification not received.

Statutory Returns	N/A	Complete statutory returns, produce e-payslips, P60s, and BACS submissions.
Queries & Correspondence	Forward requests for earnings confirmation (mortgage, HMRC, etc).	Respond to queries within 2–5 working days. Provide statutory information (GDPR/FOI).
DBS / Recruitment Add-Ons	Provide accurate info for applications.	Process DBS, vacancy ads, and barred list checks within 2–3 working days.
Business Continuity	Cooperate with provider if invoked.	Maintain and review payroll business continuity plan.
Legislative Updates	Implement updated policies.	Advise school on legislation changes and impacts.