



Finance Policy

Ratified/Reviewed by...	Date	Date to be reviewed
Trust Board	May 2025	May 2026

1. Introduction

The purpose of this policy is to ensure that The Character Education Trust (the Trust) maintains and develops systems of financial control in order to ensure strong and effective financial management. It is essential that these systems operate in accordance with the requirements of our Funding Agreement with the Department for Education (DfE)/Education and Skills Funding Agency (ESFA) and of that outlined in the Academies Trust Handbook. The policy – in conjunction with the Scheme of Delegation (Appendix A) acts as a financial framework for all our academies to work within. We acknowledge that operational practices will differ within our academy structure, but processes must be set within the parameters set out below.

The Trust must comply with the principles of financial control outlined in the academies guidance published by the DfE/ESFA. This policy expands on that and provides detailed information on the Trust's accounting procedures and systems.

This policy builds on the financial principles and requirements established and adopted in previous Finance Policies and reflects any organisational changes that have occurred over the last 12 months and includes key amendments outlined in the Academies Trust Handbook.

Values and ambitions

We believe the Trust should give young people the tools they need to be well qualified to achieve success and wellbeing and to have choices in adult life.

We envisage a Trust where well led, highly skilled and committed professionals collaborate, learn and innovate together to ensure that all academies are successful and where all learners develop good character strengths, reach their academic potential and discover where they excel.

2. Organisation

Members

Members are the ultimate layer of governance in the Trust. They appoint and remove Trustees, amend our Articles of Association and hold our Trustees to account. There are 3 members in place that will attend at least two meetings a year.

Trustees

The Trustees set the strategic direction and strategy for the Trust. They hold the leadership group of the schools to account, ensure financial efficiency and ensure the Trust is legally compliant.

The Board is governed by non-executive Trustees constituted under a Memorandum of Association and Article of Association.

The Trustees are responsible for ensuring that high standards of corporate governance are maintained.

The Trustees exercise their powers of functions with a view to fulfilling a largely strategic leadership role in the running of the academies. This affords greater opportunities for collaboration not only with regards to teaching and learning but also

in terms of the management of each academy, including the procurement of goods and services.

The Trustees are also governed by the terms of any Funding Agreement that are in place and the Academies Trust Handbook.

Strategic Leadership Group

The group is formed of the Chief Executive Officer, the Head teachers of the schools, the Director of Finance and the Director of Human Resources.

The chair of the trust will monitor the progress of the group and other members of school leadership teams might be asked to present to the group. The group will meet at least once a month to support effective leadership of the Trust and its schools, and to aid the Trustees' decision making.

Register of Interests/Related parties

It is important for anyone involved in spending public money to demonstrate that they do not benefit personally from the decisions they make. To avoid any misunderstanding that might arise all Trustees, Directors, Members and staff with significant financial or spending powers are required to declare any financial interests they have in companies and/or individuals from whom the Trust and Academies' may purchase goods or services. The register is open to public inspection; a copy of the form is appended to this policy and available on the Trust website.

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

The following employees/members of the trust are deemed to be a related party:

- Members
- Trustees
- Strategic Leadership Group
- Any close family member of the above

The existence of a register of business interests does not, of course, detract from the duties of the Trust and its staff to declare interests whenever they are relevant to matters being discussed by the Trust or a constituted committee. Where an interest has been declared, Trustees, Directors, members and staff should withdraw from that part of any committee or other meeting and should not be involved in the procurement process.

All potential transactions with related parties must be reported to the Director of Finance (DoF), on the template attached to the back of this policy, prior to taking place and prior to being confirmed with the supplier.

The DoF will submit the appropriate details to the ESFA to declare the intention to enter into such agreements. For transactions over £20,000 prior approval must be sought from the ESFA.

An agreement must not be entered into until the confirmation has been received from the ESFA via the DoF.

Any related party transactions arising in the year must be recorded on a monthly basis and submitted as part of the month end procedure. Any transactions will be disclosed to the trust and the external auditors.

3. Accounting System

All the financial transactions, both central and within the Academies, must be recorded on the computerised accounting system and in the agreed format.

The Trust has adopted the Hoge 100 Finance Package for all academies. The Trust has adopted the DfE Chart of Accounts design for the designated nominal codes. The Trust has also designed the departmental allocations based on primary and secondary schools joining the trust.

The system is based on a portal – accessible by all invited staff members (Heads of department, leadership of the school, designated technicians) and the finance officers at the school. On the portal, purchase requests are made electronically. There should be no paper based purchase orders requests.

All entries should have purchase orders completed before items are ordered. Any exceptions (such as exam entries) will need to be raised by the finance officer.

Staff expenses will be via a paper request. This will be signed by the Director of Finance after a review of mileage and the expense being acceptable. This will then be signed by the head teacher of the school before being uploaded by the finance officer for approval

The approval of purchase orders and invoices are approved only on the portal.

The main finance software (Dimensions) is only accessible by the finance officers and Director of Finance. This software is where the bank reconciliation and the vat returns are completed. Any journals for payroll or balance sheet adjustments can only be made on Dimensions, and only by the Director of Finance.

Back-up process

Back-up procedures are prescribed in the Trust IT Policy.

The Business Continuity Plan will be enacted in the event of loss of accounting facilities or financial data. This should link in with the annual assessment made by the Trust of the major risks to which the Trust and Academies are exposed and the systems that have been put in place to mitigate those risks.

The finance system is hosted on a remote server by Hoge 100. Back-ups are stored on the server with a monthly copy stored on the school's server. This means if the school faces a critical incident, the finance department should be able to continue. The CEO and the Director of Finance take home the natwest bankline cards to allow bank payments to continue in a critical event.

Transaction Processing

All transactions must be posted to the computerised accounting system and authorised in accordance with delegated levels of responsibility and authority. The delegation process is reflected in Appendix 1.

The trust is committed to a paperless process and every step should be taken for the ordering process to be completed electronically. At this stage, paper copies are kept and stored at Wrotham School. This is part of the process of completing BACS runs with the evidence of invoices being checked at this stage.

The purchase order system is via a portal – accessible by all invited staff members (Heads of department, leadership of the school, designated technicians) and the finance officers at the school.

All entries should have purchase orders completed before items are ordered. Any exceptions (such as exam entries) will need to be raised by the finance officer.

Staff expenses will be via a paper request. This will be signed by the Director of Finance after a review of mileage and the expense being acceptable. This will then be signed by the head teacher of the school before being uploaded by the finance officer for approval.

Transactions must be in real time.

All academy financial statements and reports are prepared under the Accruals Basis of accounting which requires that income and expense over £1000 must be recognised in the accounting periods to which they relate rather than on a cash basis.

Transaction Reports and Reconciliations

The Academy Trust Director of Finance will be responsible for ensuring the following is completed by the agreed deadlines which are reflected as follows:

- All income entered onto the finance system – within one week of the transaction occurring
- All invoices entered onto the finance system – within one week of the invoice arriving
- Bank reconciliation completed – throughout the month but completed within 4 working days of the month end.
- Charge card transactions entered and reconciled – within one week of the credit card statement arriving
- Payroll journal entered onto the finance system – within the month the payroll has occurred.

Once the above is completed, the Director of Finance will complete a monthly bank reconciliation. This will make sure Hoge 100 software matches the bank statement exactly with reasoning if the amounts did not agree. This will be with the CEO to counter sign within four working days of the new month.

The Director of Finance will also work on completing the month end process. This will include completing the fixed asset register registration with depreciation / amortisation being recorded, prepayment adjustments being reflected, adjustments to deferred income being completed with working papers completed.

The finance officer at Wrotham will complete the VAT return once the credit card reconciliation has been completed. The finance officer at Aylesford will reconcile the credit card in order for the VAT return to be completed for the trust.

The month end process may include locking down the month end to perform the appropriate month end reconciliations and close down.

The Director of Finance will then produce the consolidated reports and individual academy reports will be prepared. Academy reports will be submitted to the Accounting Officer and the Trust board within 12 working days of the month end deadline. Copies of the accounts will be issued to the head teachers and local governing bodies once the CEO has approved.

The Director of Finance will also prepare department reports to the head teachers for monitoring of spending on education purposes. These will include;

- a. Curriculum departments
- b. CPD
- c. Supply teacher costs
- d. Staff recruitment
- e. Staff expenses

The Director of Finance will also prepare monthly canteen reports on performance of sales and provide statistics of 3G and hall hires to form part of the reports.

The Director of Finance will complete a cash flow statement for each month for reconciliation purposes.

4. Financial Planning

The Strategic Leadership Group will discuss throughout the year, the medium term and short term financial plans that need to be reflected by the Director of Finance for financial planning. Key to this will be curriculum and staffing plans.

The three year budget will be completed as part of the development planning process. The development plan indicates how educational and other objectives are to be achieved using the expected level of resources over a three year period. This will involve school leadership with those responsible for timetabling.

Annual Budget

The Director of Finance in conjunction with the CEO, is responsible for preparing and obtaining approval for the annual budget. The budget must be approved by the Trustees at the July meeting with the Local Governing bodies receiving copies for review at their last minutes of the year.

The approved budget must be submitted to the ESFA by the deadline each year and the Director of Finance is responsible for establishing a timetable which allows sufficient time for the approval process and ensures that the submission date is met.

The annual budget will reflect the best estimate of the resources available to each school for the forthcoming year and will detail how those resources are to be utilised. There should be a clear link between the development plan objectives and the budgeted utilisation of resources.

Budgets and supporting evidence will be completed via IMP Software – a dedicated package for budget planning and allows for adaption of budgets quickly when discussions take place.

The final approved budget will then be loaded on to Hoge 100 with a time proportioned basis to reflect a cash flow expectation to be considered.

The budgetary planning process will incorporate the following elements:

- Forecasts of the likely number of pupils to estimate the amount of ESFA grant receivable
- Review of other income sources available to the Academies to assess likely level of receipts
- Review of past performance against budgets to promote an understanding of the Academies cost base
- Identification of potential efficiency savings and how these will occur
- Review of the main expenditure headings in light of the development plan objectives and the expected variations in cost e.g. pay increases, inflation and other anticipated changes
- A staffing structure that fulfils statutory requirements and supports academy improvement – the staffing costs must not exceed 85% of the total in year funding without the approval of the Accounting Officer.

Balancing the Budget

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

All budgets submitted throughout the year are to be balanced prior to submission. If in exceptional circumstances the budget is not balanced in any given year a detailed plan is to be submitted alongside the budget detailing the reason for the deficit and the intended recovery plan to revert the academy back to a balanced budget.

The Trustees may request that a percentage of academy surpluses are held centrally as a contingency measure in order to fund emergency or extraordinary items/costs, aid cash flow or used for collaborative initiatives and projects.

Finalising the Budget

Once the different options and scenarios have been considered, a draft budget should be prepared by the Director of Finance for approval by CAO and then Trustees. Once agreed, the budget should be communicated to appropriate staff members so that everyone is aware of the overall budgetary constraints.

The budget should be seen as a working document which may need revising throughout the year as circumstances change.

The Trust finance team will work with each individual Academy to formulate their annual budget requirements and complete the Budget Forecast Return to submit to the ESFA by the deadline.

Monitoring and Review

Monthly budget monitoring reports will be prepared by the Director of Finance as part of the month end process. The reports will detail the following:

- an income and expenditure account

- variation to budget report
- cash flows
- balance sheet

Budgets are to be monitored at academy level by the Director of Finance and the Academies Head teachers.

Any potential overspend against the budget must in the first instance be discussed with the Academy Head teacher and the Director of Finance.

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

All academies presenting a year end surplus exceeding 5% of funding will be asked to provide a robust spending plan outlining the use of these surplus funds – the plan must be aligned to reducing identified risks and supporting academy improvement. Plans will be ratified by Trustees.

A 'working budget forecast' must be kept by the Director of Finance to enable the year-end financial position to be forecast and corrective action to be taken at the earliest opportunity if required. This will be done with the IMP Software.

Financial Performance

Each academy's financial performance is monitored centrally on an ongoing basis. At key stages in the year the data is analysed and assessed according to financial and budgetary risk.

Indicators include:

- In year and future outturn position – surplus/deficit
- Salary costs as a percentage of funding – leadership structure, teaching staff, teaching assistants, other staff
- Salary costs as a percentage of salary budget
- Benchmarking and comparative data – across the Trust, other MATs and national
- Pupil Teacher Ratios
- Projected numbers on roll
- External funding factors

If an academy is deemed to be at risk the Director of Finance and Accounting Officer will meet to agree a timetabled recovery plan. This plan will be shared with Trustees. The plan will allow for budgetary improvements to be made over an initial 12 month period.

5. Payroll

Staff Appointments

The Trust will annually approve a staffing structure for each Academy – the total cost of staffing must not exceed 85% of the in year funding. Changes can only be made to this establishment with the express approval of the Trust who must ensure that adequate budgetary provision exists for any establishment changes.

The Academy Head teacher must consult with the Director of Finance /HR Director and before the recruitment process for any staff member, regardless of whether these result in a change to the existing staff structure. Appointment of Deputy Head teachers and Assistant Head teachers must follow consultation with the CEO/Trustees. The HR Director must ensure personnel files are maintained for all members of staff which include contracts of employment.

Salary Payments

The payroll is completed by the Payroll Officer. It is reviewed by the Director of Finance and Head teachers on a monthly basis.

All salary related payments are processed via BACS – only when the payroll has been checked and authorised by the Academy. The BACS net pay file is uploaded to Natwest centrally and authorised for payment via the academy bank account. The Accounting Officer and Director of Finance will approve net payments.

The Director of Finance will reconcile the payroll files and schedules to the bank account. The CEO will also approve the payment for BACS runs and sign the statement.

The Director of Finance will post reconciled monthly payment transaction details to the computerised accounting system and reconcile to the budget.

The Director of Finance will reconcile the payroll reports to the budget on a monthly basis. This is done via IMP Software.

6. Income

The main sources of income for the Trust and associated academies is via grants issued by the ESFA, the receipt of which is monitored directly by the Director of Finance who is responsible for ensuring that all grants due to the Trust are collected.

The academy ESFA grant or GAG will be received by the Trust at the beginning of the month in line with the funding profile. The Trust will transfer the funding to the academy on an accounting basis.

Other forms of delegated funding will be received by the Trust and/or academy in line with ESFA guidance. This will mainly include:

- Devolved Formula Capital
- Pupil Premium

The academy will also secure income from other sources for various purposes and receipted and disbursed in accordance with the systems and processes outlined in the relevant academy policy. This could be in relation to:

- Trips and Visits
- Dinner money
- Letting of facilities
- Fund raising
- Donations
- Sponsorship
- Miscellaneous income

All academies are to be cashless and can use Parent Pay or Scope Pay management information system. New academies should be cashless within 12 months of conversion. Only in exceptional circumstances, where the alternative would lead to a financial loss to the academy, should cash be accepted.

7. Debt Management

When an academy raises an invoice, unless specifically detailed on the invoice, the terms will be 30 days.

The following process shall apply where payment is not received:

- 30 days after original invoice – statement issued
- 2 weeks after statement issued – reminder letter issued
- 2 weeks after reminder letter – second reminder letter issued
- 2 weeks after second reminder letter – refer to Director of Finance and seek legal advice if deemed necessary

The level in relation to the 'write off' of bad debts is outlined below:

- up to £1000 – Director of Finance
- Over £1000 – Trustees

Any 'write off' of bad debts must be recorded and referred to the Director of Finance.

Parent debts

The Director of Finance should ensure debts are not accrued by parents for school meals, school trips, wraparound care and any other chargeable activities.

Outstanding accounts should be reviewed and followed up on a weekly basis.

When deemed appropriate a hold should be placed on any chargeable activities when debts remain unpaid.

8. Cash Management

Bank Accounts

The opening of all accounts must be authorised by the Trust. The Director of Finance will have access to the accounts at all times. The Trust operates a central function for banking but will hold a reserve account for each academy. All bank accounts will be with Natwest Bank.

The Trust Director of Finance, Accounting Officer and the Chair of the Trust will be included as an official signatory on all Trust bank account mandates.

Deposits

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

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

Payments and withdrawals

Bacs payments must be made wherever practicably possible. Cheques are not to be used by any academy.

Administration

The School finance officer must ensure that bank statements are received regularly and that reconciliation is completed as a minimum on a weekly basis. Reconciliation procedures must ensure that:

- All bank accounts are reconciled to the academy's computerised cash book
- Reconciliation is prepared by the School Finance Officer for Wrotham
- The Reconciliation report is countersigned by the Director of Finance and Accounting Officer
- The Director of Finance is notified of any adjustments or issues arising from the process
- Any outstanding transactions are investigated as part of the month end reconciliation process, prior to being submitted

Petty cash is not to be held in any academy.

A separate school reserve account will be held by the Trust. This is not to be used for day to day activities.

Cash Flow Forecasts

The Director of Finance is responsible for preparing up to date cash flow forecasts to ensure that the academy has sufficient funds available to pay for day to day operations. Any anticipated overdrawn balances must be reported to the Accounting Officer as a matter of urgency.

Investments

Investments of surplus funds across the trust are to be arranged only by the Trust Board and following financial guidance from the ESFA and the Academy Trust Handbook.

All financial and other risks must be considered before any investment is made.

Charge card

The Trust recognises the benefits of charge cards as an alternative means of paying for goods and services. The advantages include reduced paperwork, reduced administration time and costs, opportunity to make online purchases and seek discounts from suppliers on the basis that they receive immediate payment.

Charge cards are particularly suitable for high volume, low value purchases, booking off site visits and for site staff to order building materials etc.

The Director of Finance or Finance Officer will have a charge card for the academy with limits of £10000.

A purchase requisition must be raised and appropriately authorized for all charge card purchases.

Only the cardholder is to use the card for online purchases. Card details should not be stored on any website. The Credit card should only be used by the Finance Department for online purchases. In the event the card has to be used off of site, it should only be used by the Director of Finance (who knows the electronic pin).

Personal reward cards must not be used by staff members when using the charge card. The charge card transactions must be reconciled on Hoge 100 on a monthly basis.

The charge card will be paid off in full monthly and payment is to be made by direct debit.

9. Fixed Assets

Asset Register

All items purchased with a useful life of over 24 months when purchased, must be entered in the academy fixed asset register as part of the month end process and accounted for accordingly on Hoge 100. The Director of Finance will oversee the administration of the register and is required, on a yearly basis, to check the register and report any discrepancies to both the Head teachers and the trust board. Each academy must also maintain an inventory of equipment, furniture, fixtures and fittings.

The asset register should include the following information:

- Asset description
- Date of acquisition
- Asset cost
- Relevant depreciation policy
- Depreciation to date
- Current t book value

The asset register helps:

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

Security of Assets

Stores and equipment must be secured by means of physical and other security devices and accessed by 'authorised' personnel only.

All the items in the register should be permanently and visibly marked as the academy's property and there should be a regular (at least annual) count by someone other than the person maintaining the register. Discrepancies between the physical count and the amount recorded in the register should be investigated promptly and, where significant, reported to the Trust. Inventories of academy property should be kept up to date and reviewed regularly. Where items are used by the academy but do not belong to it this should be noted.

Disposals

The prior approval of the Trust will be required for the disposal of any assets and any disposal must be subject to a competitive tendering process or by sale by public auction.

Disposals up to the value of £5000 will require the approval of the Director of Finance, anything above £5000 will require the approval of the Trustees.

The prior written consent of the Secretary of State for Education is required in accordance with section 89 of the School Funding Agreement as follows:

- Before the disposal of any asset for which a grant of over £20,000 was made, or land and buildings which had been transferred from the Local Authority at no cost to the School
- Before the sale or disposal by other means, or reinvestment of proceeds from the disposal of an asset or group of assets, for which a capital grant in excess of £20,000 was paid.
- As set out in section 93 of the School Funding Agreement the School will provide 30 days written notice to the Secretary of State for Education of its intention to dispose of assets for a consideration less than the best price that can reasonably be obtained, whether or not such disposal requires the Secretary of State for Education's consent as detailed above.

There are complications with the disposal of computer equipment, as the academy would need to ensure licenses for software have been legally transferred to a new owner. The IT managers at each site would be responsible for disposing equipment in a safe manner.

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

Loan of Assets

Items of academy property must not be removed from academy premises without the authority of the Head Teacher. A record of the loan must be maintained by the academy.

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.

Depreciation of Fixed Assets

Depreciation will be recorded as follows:

- Plant and Machinery – 20% on cost
- Fixtures, fittings and equipment – 20% on cost
- ICT Equipment – 33% on cost
- Long leasehold buildings – 50 years straight line

10. Tax

The Trust is registered for VAT purposes and accords with the statute. Regulation details are outlined on the website: www.hmrc.gov.uk .

VAT claims are submitted to the HMRC on a monthly basis by the Trust Finance Manager.

Reimbursement of VAT will be made to the academies when the Trust receives payment from HMRC.

The School finance officer for Wrotham will be responsible for applying VAT in line with HMRC requirements.

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

11. Audit

The Trust has appointed McCabe Ford Williams Chartered Accountants as its auditors. In addition to the statutory audit, a regularity audit will be undertaken at each academy within 3 months of conversion in order to determine the level of control, the effectiveness of systems and to provide the Trust with assurances in relation to regularity, propriety and compliance. This is commissioned via a separate letter of engagement which will specify the precise requirement of the work and fees that will be charged. The costs will be paid from the start up grant.

The Trust has appointed Juniper Education to carry out the internal scrutiny work as outlined in the Academies Trust Handbook. All findings and reports will be presented to the Audit and Risk Committee and then shared with all Trustees.

The scope of the work will be reviewed and agreed by the Audit and Risk Committee and will be determined based on risk. Work will be carried out to monitor compliance with the finance and procurement policy and any other related policies.

There must be an appropriate, reasonable and timely response to any findings by auditors, any recommendations outlined in the management letter require an appropriate management response and actioned.

12. Insurance

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

All academies are registered with the DfE RPA scheme on conversion.

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

The Trust will not give any indemnity to a third party.

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

13. Operational Services

All academies in the Trust will be part of the Trust's operational service offer to ensure best value and compliance across the Trust.

The academy will pay the Trust the annual fee agreed prior to the upcoming academic year on a monthly basis. The cost to the academy is made up of a fixed cost plus a variable cost based on pupil number.

Any invoice paid direct by the academy for any services included in the operational service should be reclaimed on a monthly basis by sending the operational service claim form to the DOF.

Details of the services included are appended to this policy. Services included will be reviewed on an ongoing basis.

Appendix A
Declaration of Interests



Declaration of pecuniary and personal interest

Name:

School:

Position:

I (Name) declare as a Trustee of the Character Education Trust/Governor of Wrotham School/Governor of Aylesford School/Senior Member of staff that I hold the following personal and/or pecuniary interest(s):

Pecuniary interests	Please provide details of the interest
Current employment	
Businesses (of which I am a partner or sole proprietor)	
Company directorships – details of all companies of which I am a director	
Charity trusteeships – details of all companies of which I am a trustee	
Membership of professional bodies, membership organisations, public bodies or special interest groups of which I am a member and have a position of general control or management	

Gifts or hospitality offered to you by external bodies while acting in your position as a governor/trustee and whether this was declined or accepted in the last 12 months	
Contracts offered by you for the supply of goods and/or services to the trust/school	
Any other conflict	

Personal interests	Name	Relationship to me	Organisation	Nature of the interest
Immediate family/close connections to governor/trustee/senior member of staff				
Company directorships or trusteeships of family/close connections to governor/trustee				

If you are a governor or trustee of any other schools and/or academies, please provide details below:

Name of school/academy: _____
Position held: _____
Date appointed/elected to post: _____
Date of termination to post: _____

To the best of my knowledge the information supplied above is correct and complete. I understand that it is my responsibility to declare any conflict of interest/loyalty, business or personal that relates directly or indirectly, to myself or any relation in any contract, proposed contract or other matter when present at a meeting at the school where such contract or matter comes under consideration. I understand that I must withdraw from any meeting during the discussion of such contract or matter and must not vote in respect of it.

I agree to review and update this declaration annually and if my situation changes throughout the year. I give consent for the information provided to be used in accordance with the trust/school's conflicts of interest policy.

Signed:

Date:

Guidance notes

Governors/trustees and Senior Staff have a legal duty to act only in the best interests of their schools. Where a situation arises in which they cannot do this due to a personal interest they have, steps should be taken to identify, prevent and record the conflict. This ensures Governors/Trustees/Senior Staff are acting in the best interests of the school.

In the declaration above, you must provide details relating to:

- Your ownership or partnership of a company or organisation which may be used by the trust/school to provide goods or services;
- Goods or services you offer which may be used by the trust/school;
- Any close relation you have to someone who satisfies either of the above;
- Any close relationship you have to someone who is employed by the trust/school.

Declaring your conflicts of interest is a legal requirement within the School Governance (Roles, Procedures and Allowances) (England) Regulations 2013 and for academies, in the Articles of Association and Academies Financial Handbook. However, making an annual declaration does not remove your requirement to make an oral disclosure of the interest and temporarily leave the meeting, where the interest is relevant to something being discussed.

Pecuniary interests

Generally, governors/trustees/senior staff should not participate in any discussions in which they may directly or indirectly benefit from a pecuniary interest, except where the relevant authority has authorised this i.e. legislation for maintained schools or articles of association for academies. A direct benefit refers to any personal financial benefit and an indirect benefit refers to any financial benefit you may have by virtue of a relationship to someone who stands to gain from a decision of the governing board. Both direct and indirect interests must be declared.

Non-pecuniary interests (Conflicts of loyalty)

There may be a non-pecuniary interest whereby the governor/trustee/senior member of staff does not stand to gain any benefit but a declaration should still be made. For example, this might be where a governor has a family member working in the school. While the governor/trustee/senior member of staff might not benefit personally, their judgment could be impaired if something was brought up that would affect the family member.

Handling the conflict

The governing/Trust board must make a decision as to whether or not they should take steps to remove the conflict by:

- Not pursuing the course of action it relates to; or
- Proceeding with it in an alternative way which does not give rise to conflict; or
- Not appointing the governor in question or seeking to secure their resignation.

In the minutes of the meeting, the following should be recorded:

- The nature of the conflict;
- Which governor(s)/trustee(s) it relates to;
- Whether a declaration was made in advance of the meeting;
- A brief overview of what was discussed;
- Whether the governor(s)/trustee(s) withdrew from the meeting;
- How the governors made the decision in the best interests of the school.

The School and Early Years Finance (England) Regulations 2013 provide for local authority financing schemes to keep a register of pecuniary interests for the trustees, governors and staff of schools. The register should be reviewed annually by the clerk to the governing body but any new interest or ceased interest, should be reported to the clerk as and when they occur. Upon completion, this signed form should be given to the clerk of governors whose responsibility it is to keep a register of all interests and review it annually.

Appendix B
Operational services

Service	Solution
Anti Virus	Smooth wall – this is via Cantium package with the landline
Collaboration Tools	
Data & Electrical Cabling	Completed by Paul Kitney and Steve Ellis.
Email Services	Office 365 hosted by Microsoft. Ran by Paul Kitney and Steve Ellis with assistance from software
eSafety Audits & Training	Akita provide audit and software
Content Filtering & Monitoring	Smoothwall and Impero provide filtering and monitoring of the software
Firewall Security	Provided via Cantium
H&S Audits & Certification	Steve Shearman and Mitie use external consultants including Juniper in order to provide audits and certification
Home Working Solution	Aylesford – Remote server internally prepared. Wrotham – Use of VPN provided by Cantium
Internet Services	Cantium services
Professional Memberships & Subscriptions	
Microsoft Licensing	Microsoft – provided Cantium
Mobile Device Management	Cantium provide the service
Network Cabinets	Maintained by Paul Kitney and Steve Ellis with both supported by Akita and DMS
Backup	Completed in house with remote back ups for Sims
Safeguarding Audits & Training	Juniper providers reviews
Finance system, support & licenses	Hoge 100, IMP Software, Sage Payroll
Servers	Maintained by Paul Kitney and Steve Ellis with both supported by Akita and DMS
MIS Licensing & Support	Sims supported via Cantium
Switching	
Telephone	
UPS & Batteries	Maintained by Paul Kitney and Steve Ellis with both supported by Akita and DMS
Website & Hosting	Rye Design
Wireless	Maintained by Paul Kitney and Steve Ellis with both supported by Akita and DMS

Appendix C – Scheme of Delegation

	Who can raise	Who cannot
Purchase Order requested:	HOD, Technician (with approval of HOD), Leadership, Finance Officer, Site Manager, Canteen Manager	Director of Finance is blocked from requesting POs
PO Approval	Main approver	Substitute
<£5000	Director of Finance	HT
<£5000 and over budget	Director of Finance and Head teacher	HT and CEO
£5,000 - £10,000	Director of Finance and Head teacher	HT and CEO
£10,000 - £25,000	Director of Finance and CEO	HT and CEO - 3 quotes
£25,000 and over	Director of Finance and CEO after Board approval	HT and CEO - min 3 quotes
Invoice approval	Main approver	Substitute
<£5000	Director of Finance	HT
<£5000 and over budget	Director of Finance and Head teacher	HT and CEO
£5,000 - £10,000	Director of Finance and Head teacher	HT and CEO
£10,000 - £25,000	Director of Finance and CEO	HT and CEO
£25,000 and over	Director of Finance and CEO after Board approval	HT and CEO
Banking process	Main approver	Substitute
	Finance Officer to collect all required invoices	
	Finance Officer to make suggested payments list	Other FO
	Director of Finance to review suggested payments list - sign all invoices reconciled to list	CEO
	Director of Finance to approve suggested payments list on Hoge 100	CEO
	Finance Officer to upload BACS run on Hoge 100	Other FO
	Finance Officer to upload BACS on Natwest	Other FO
	Director of Finance and CEO to approve payments	MCA to cover either if absent
	Finance Officer to send Remittance Advice	Other FO
Credit card	Up to £10,000 per school per month	
	Transactions approved by Director of Finance - with Head teacher if over budget	HT
Pre paid cards	£50 on each card except for Reception at £150 for postage	HT
Fuel cards	Held by KTH at AS and SS at WS	