

GULARITY, PROPRIETY AND COMPLIANCE

Please set out below the Academy's response to the risk of irregularity, impropriety and non-compliance as well as details of supporting evidence

	Area	Questions	Academy response (including any specific cases of relevance)	Supporting evidence (suggestions in brackets)
1.	Non-compliance with the Academy's memorandum and articles.	<p>How does the Academy ensure that no activities are undertaken that are outside of it objects?</p> <p>Does the Academy periodically review its non-core activities to ensure that they are within its powers?</p>	<p>Full scrutiny of management accounts by F&GP each term, ensuring that activities are explained</p> <p>Reporting Officer visits undertaken on a termly basis at which entries in the finance system are reviewed</p> <p>Review of TOR on annual basis</p>	<p>Academy response:</p> <p>GB and F&GP meeting minutes</p> <p>Reporting Officer reports</p> <p>F&GP Terms of Reference</p> <p>Buzzacott response:</p>
2.	Compliance with the terms of the funding agreement and the conditions of General Annual Grant funding.	<p>How does the Academy ensure that all funding received from the EFA is spent in line with the funding agreement?</p> <p>Is there a risk that any costs are charged to GAG funds that are not in line with the terms of the funding. (Please specify)?</p>	<p>Application of funds is confirmed as in line with the terms of funding by the regular RO and audit scrutiny.</p>	<p>Academy response:</p> <p>Financial Procedures Manual</p> <p>RO Reports</p> <p>Audit reports</p> <p>Buzzacott response:</p>
3.	Compliance with terms and conditions of other restricted revenue grant funding	<p>How does the Academy ensure that all other funding received from the EFA, local authority and other government bodies are spent in line with the restrictions on that revenue funding?</p>	<p>The academy has received funding for a number of purposes, including Pupil Premium, Start Up Grants, catch-up funding, PSHE etc.</p> <p>These funds are spent appropriately, as disclosed in the accounts.</p>	<p>Academy response:</p> <p>SUG receipts based predominantly on economies of scale and the surplus has been carried forward in order to continue to cover these costs whilst the school is yet to reach capacity. Other grants are spent in-year.</p> <p>Buzzacott response:</p>
4.	Compliance with the terms and conditions of capital grant funding	<p>How does the Academy ensure that all funding received from the funding agency is spend in line with the restricted capital funding?</p>	<p>Minimal formulaic capital funding received in the year.</p> <p>No capital projects separately funded by the EFA</p>	<p>Academy response:</p> <p>No specific projects funded by the EFA in the current year.</p> <p>Buzzacott response:</p>

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5.	Remuneration of employees	<p>How does the Academy ensure that the remuneration of employees is set at an appropriate rate?</p> <p>How does the Academy ensure that only valid amendments to the payroll are processed?</p>	<p>The academy applies the national pay and conditions policies for staff</p> <p>Payroll is reviewed in three separate stages by Finance Officer / CFO and Principal.</p> <p>Sampling is then undertaken by the RO</p> <p>Remuneration for SLT is approved at Governor level each autumn</p>	<p>Academy response:</p> <p>Authorised Payscales</p> <p>Annual salary confirmation letters to staff</p> <p>Payroll procedures checked by RO</p> <p>Buzzacott response:</p>
6.	Severance and compensation payments	<p>How does the Academy ensure that any payments to staff leaving the Academy are at an appropriate level?</p> <p>How does the Academy ensure that any payments to staff leaving the Academy are correctly authorised, including obtaining Secretary of State approval where required by the Academies Financial Handbook 2015 (section 3.7)?</p>	<p>The academy scheme of delegation requires that all severance / compromise agreements are to be approved by governors, with payments in excess of £25k to be signed off by Chair / Vice Chair</p> <p>No payments in excess of the £50k limit set in the Financial Handbook have been made</p>	<p>Academy response:</p> <p>Scheme of Delegation</p> <p>Financial Handbook</p> <p>Staff records</p> <p>Copy of governor meeting minutes</p> <p>Buzzacott response:</p>

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9.	Conflicts of interest and related party transactions	<p>Is there a standing item on committee agendas to declare conflicts of interest?</p> <p>Do the Academy's members, trustees (or equivalent) and senior employees complete annual declarations of interest? (This should also capture the interests of close family members).</p> <p>Are the declarations made by the members and trustees published on the Academy's website? (Academy maintains discretion over publishing interests of close family members).</p> <p>How does the Academy ensure that any transactions with these related parties are identified?</p> <p>How does the Academy ensure that it pays no more than cost for goods or services purchased from connected parties? (See full details of the requirements within the Academies Financial Handbook 2015, section 3.2)</p>	<p>Standing agenda item at all meetings</p> <p>Annual declarations completed by all governors and SLT</p> <p>All declarations published on the website</p> <p>Register of business interests maintained</p> <p>Related party transactions are not entered into</p>	<p>Academy response:</p> <p>Declarations of business interests are collated by the sponsor.</p> <p>Buzzacott response:</p>

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10.	Financial oversight and control	<p>Has the Academy's Board approved a written scheme of delegation setting out the level of authority entrusted to those involved in the day-to-day management of the Academy?</p> <p>Have the Board of Trustees (or equivalent) and the Academy's Finance Committee (or equivalent) met at least three times in the year and given due regard to the Academy's finances at these meetings?</p> <p>Has a dedicated Audit Committee been established where the Academy's annual income exceeds £50 million?</p> <p>Has the Academy ensured that there are no 'de facto' or 'shadow' trustees/directors?</p> <p>Has a review of the Academy's governance arrangements taken place during the year including consideration of the composition of the Board in terms of skills, effectiveness, leadership and impact?</p> <p>Has the Academy published details of its governance arrangements on the Academy's website?</p> <p>Has the Academy been notified EFA of any changes to the Chair of Trustees, Accounting Officer or Chief Financial Officer?</p> <p>Does the Academy have an appropriate level of insurance in place?</p>	<p>Written scheme of delegation is in place and is reviewed annually</p> <p>Four meetings of the Finance & General Purposes committee are held each year. The minutes of those meetings are then reviewed by the full Governing Body at separate meetings throughout the year</p> <p>N/A</p> <p>Regular reviews undertaken</p> <p>Yes</p> <p>No changes</p> <p>Insurance is managed via the RPA, with additional cover through Marsh for items not covered by that scheme</p>	<p>Academy response:</p> <p>Documentation all available on site and at the Sponsor's address</p> <p>Buzzacott response:</p>

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11.	Procurement	How does the Academy ensure that an appropriate framework of financial procedures is in place with appropriate levels of authority for procurement and tendering?	<p>The academy scheme of delegation and Financial Procedures manual include sections relating to tenders.</p> <p>The web-based ordering system automatically triggers appropriate approval in line with the scheme of delegation</p>	<p>Academy response:</p> <p>Financial procedures manual</p> <p>Scheme of delegation</p> <p>Corero / Civica software has in-built workflow control, directing purchase orders to appropriate budget holder, and for confirmation dependant on value</p> <p>Buzzacott response:</p>
12.	Security of assets	<p>How does the Academy ensure that there is physical security over the school's assets?</p> <p>How does the Academy ensure that assets are not disposed of inappropriately?</p>	<p>Security staff employed throughout opening hours. Physical presence is maintained during working hours and lettings, complemented by roving patrols out of hours</p> <p>Access control and CCTV at school entrances</p> <p>All assets are tagged and included on the asset register</p> <p>High value portable assets such as cameras and laptops are stored in lapsafes / storerooms and responsibility sits with a named person</p> <p>Booking systems in place for portable assets</p> <p>Regular stock checks</p>	<p>Asset register</p> <p>Financial Procedures manual</p> <p>Security contract</p> <p>No substantial assets disposed of during the year</p> <p>Buzzacott response:</p>

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13.	Whistle-blowing	Where concerns arise regarding irregularity or impropriety, is there a clear whistle-blowing procedure?	Policy in place and accessed via the shared drive	Academy response: Whistle-blowing policy Buzzacott response:
14.	Controls over inappropriate expenses (employees and governors)	Does the Academy have adequate controls in place to ensure that no inappropriate expenses are authorised including those for personal benefit, overseas travel and entertainment?	Overseas travel authorised at governing body meetings Expenses signed off by line manager and Principal / CFO	Academy response: Expenses policy and claim form template Buzzacott response:
15.	Use of credit cards	How does the Academy ensure that any credit cards are used appropriately and correctly authorised? Has the use of credit cards led to any charges being incurred by the Academy during the year?	One credit card held – kept in safe. Usage is tightly controlled and transactions are reconciled to the statement and scrutinised by the CFO Transaction charges are incurred in line with standard bank charges	Academy response: Finance procedures CC Statements and bank reconciliations Buzzacott response:
16.	Corruption including gifts and hospitality	Please provide details of the Academy's procedures to prevent corruption including policies on receipt of gifts and hospitality.	Policies in place in respect of gifts register and hospitality. Procedure detailed in the staff code of conduct	Academy response: Policy on gifts and hospitality Staff code of conduct Buzzacott response:
17.	Fraud	Where not covered above, how does the Academy mitigate the risk of fraud arising within the school?	Separation of duties in respect of finance All payments require dual authorisation by Principal and CFO Contracts approved by Principal in line with Scheme of Delegation	Academy response: Buzzacott fraud checklist Risk Register Buzzacott response:

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18.	Secretary of State approval	<p>How does the Academy ensure that it obtains Secretary of State approval as required by AFH 2015 for the following:</p> <ul style="list-style-type: none"> - Acquisition or disposals of freehold land and buildings or disposal of heritage assets - Entering into a property lease with a term more than seven years or granting a lease interest to a 3rd party of any term - Entering finance leases or other forms of borrowing - Individual write offs of irrecoverable debts and overpayments or entering into guarantees, indemnities or letters of comfort where the transaction is individually >£45k or 1% of total income, or where the cumulative annual limits are exceeded (see AFH 2015 section 3.6.2) - Non-statutory/non-contractual staff severance payments or compromise payments (to provide redress for loss or injury) which are individually more than £50k; or ex-gratia payments of any amount - Novel or contentious transactions <p>(NB: Full details of requirements are contained within AFH 2015, Annex B)</p>	<p>The Financial Handbook has been presented at governors' meeting in order that they are aware of the requirements.</p> <p>The Reporting Office is also aware of the content and keeps the requirements in mind when completing the termly checks.</p> <p>The academy is still in the Start-Up phase and has not yet reached the stage where assets are disposed of, and does not operate a sales ledger in light of small income receipts for lettings. In these circumstances, debtors are likely to be limited at <£1k.</p> <p>No leases have been entered into during the period</p>	<p>Academy response:</p> <p>Financial Handbook Scheme of Delegation Governors' minutes RO reports</p> <p>Buzzacott response:</p>

The additional questions below apply to multi-academy trusts only:

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Please set out below the MAT's response to the risk of irregularity, impropriety and non-compliance as well as details of supporting evidence				
	Area	Questions	MAT response	Supporting evidence (suggestions in brackets)
19.	Central charges	What basis has the MAT established for charging member academies for central services and how has this been agreed?	NA	(Minutes of meeting and supporting papers confirming agreement of central charges) MAT response: Buzzacott response:
20.	Reserves transfers	Where there have been reserve transfers in or out of individual academies not covered by the central charging policy, how have they been agreed?	NA	(Minutes of meeting and supporting papers confirming agreement of central charges) MAT response: Buzzacott response:
21.	Inter-academy charges	Where costs including staff have been charged between academies (e.g. central staff charged out to academies), what is the basis for this charging?	NA	(Reference to the procedure set out in the Academy's financial procedures manual) MAT response: Buzzacott response:

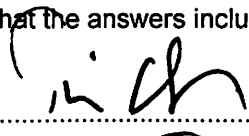
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	Area	Questions	MAT response	Supporting evidence (suggestions in brackets)
22.	Central oversight – risk management	How does the MAT ensure central oversight of the activities of member academies and ensure that the risk of business failure at any member academy is sufficiently monitored?	NA	(Details of the risk management framework) MAT response: Buzzacott response:
23.	Central oversight – internal controls	How does the MAT ensure that the monitoring of internal controls is sufficient across the member academies and the MAT as a whole including the centre?	NA	(Details of the internal control monitoring framework) MAT response: Buzzacott response:
24.	Conflicts of interest and related party transactions	Has the MAT captured details of the pecuniary interests of any local governors and has this information been published on the school's website?	NA	

Approval by Accounting Officer

I confirm that the answers included in this regularity self-assessment are correct to the best of my knowledge and belief.



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Tim Clark – Accounting Officer for Skinners' Academy

8 - XII - 2017

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Date