



Financial Framework

The Bay Learning Trust

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Document Control

This document has been approved for operation within:	All Trust Establishments
Date effective from	March 2025
Date of next review	March 2026
Review period	12 months
Status	Statutory
Owner	The Bay Learning Trust
Version	V 5.1
Approved by	Finance and Resources Committee
Date approved	18 March 2025

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Section One:

Schedule of Financial Delegations

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Ref	Process	Refer to	Delegation Limits				
			School Business Manager (SBM), Trust Finance Manager (TFM)	Headteacher (HT)	Trust Accountant (TA)	Chief Finance Officer (CFO)	Chief Executive Officer (CEO)
			<ul style="list-style-type: none">£10,000 to £75,000 – 3 written quotes required with a documented rationale detailing the preferred supplier, to be referred centrally for review and sign off by the Chief Finance Officer.Items over £75,000 to be formally tendered with approval of the tendering process needed in writing from the Chief Finance Officer as per financial regulations.Items over the threshold limits to be subject to the Public Procurement Act 2023.3 quotes/tender are not required for specific costs due to their nature, for example exam fees, agency supply, educational consultancy.				
Payments Section							
2.	Approve a BACS Payment Run	Section Two: Cash Management	Up to £10,000 per transaction – with 1 other delegated individual Can load any value of payments onto the system but needs approval from other signatories in all cases.	Up to £20,000 per transaction – with 1 other delegated individual This could be delegated to another member of the Senior Leadership Team (SLT) however review of payments must have been completed by Headteacher or higher delegation	Up to £20,000 per transaction – with 1 other delegated individual	Up to £150,000 per transaction with 1 other delegated individual NB not investments, payroll or externally funded capital schemes Above £150,000 with Finance and Resources	Up to £150,000 per transaction with 1 other delegated individual NB not investments, payroll or externally funded capital schemes Above £150,000 with Finance and Resources Committee approval.

Ref	Process	Refer to	Delegation Limits				
			School Business Manager (SBM), Trust Finance Manager (TFM)	Headteacher (HT)	Trust Accountant (TA)	Chief Finance Officer (CFO)	Chief Executive Officer (CEO)
4.	Approve employee expenses <i>(Must be signed by member of staff higher in the structure and not by the employee)</i>	Section Four: Appendix B	Up to £250	Up to £500	Up to £500	Over £500	Over £500
5.	Approve Headteacher's expenses	Section Four: Appendix B	No delegation	No delegation	No delegation	No delegation	All expenses
6.	Approve payments using purchasing cards	Section Two: Procurement	Up to £1,000 for a single transaction	Up to £2,000 for a single transaction	Up to £2,000 for a single transaction	Up to £5,000 for a single transaction (facility in place to increase at Central Team level)	Up to £5,000 for a single transaction (facility in place to increase at Central Team level)
7.	Any payments made outside of employment terms and conditions – ex gratia, severance	Section Two: Other Transactions	No delegation	No delegation	No delegation	Up to £50,000 for non-statutory element.	Up to £50,000 for non-statutory element.

Ref	Process	Refer to	Delegation Limits				
			School Business Manager (SBM), Trust Finance Manager (TFM)	Headteacher (HT)	Trust Accountant (TA)	Chief Finance Officer (CFO)	Chief Executive Officer (CEO)
	and compensation payments					Over £50,000 for non-statutory element Board and DfE approval required	Over £50,000 for non-statutory element Board and DfE approval required
Budgets and Income Section							
8.	Commit to DfE grant funding agreements for income to the Trust	Section Two: Income	No delegation	No delegation	No delegation	Up to £50,000	Unlimited
9.	Approving grant funding claims and DfE Returns		No delegation	No delegation	No delegation	Unlimited	Unlimited
10.	Approving increases to revenue budget headings that are within the overall budget	Section Two: Financial Planning	Up to £10,000 - to be reported to the Headteacher as part of budget monitoring	Up to £20,000 - to be reported to the CFO and LGB	Up to £20,000 – to be reported to the CFO	Up to £50,000 – to be reported to the CEO	Unlimited - to be reported to Finance and Resources Committee
11.	Approving an increase in the overall budget for an academy or Central Team. This is	Section Two: Financial Planning	No delegation	No delegation	No delegation	No delegation	Up to £50,000 > £50,000 Finance and Resources

Ref	Process	Refer to	Delegation Limits				
			School Business Manager (SBM), Trust Finance Manager (TFM)	Headteacher (HT)	Trust Accountant (TA)	Chief Finance Officer (CFO)	Chief Executive Officer (CEO)
	to cover issues outside of the annual budget setting process						Committee (must be in line with the Trust's Reserves Policy and will require Board approval if outside of this)
Other Financial Limits							
12.	Purchase or sale of freehold or leasehold property	Section Two: Fixed assets	No delegation	No delegation	No delegation	No delegation	To seek approval from the Board and the DfE
13.	Disposal of fixed assets All to be reported to the Board annually	Section Two: Fixed assets	No delegation	Up to £10,000 To be reported to the CFO and LGB	Up to £10,000 To be reported to the CFO	Up to £20,000 To be reported to the CEO	Up to £20,000 To be reported to Finance and Resources Committee
14.	Bad debt write offs All to be reported to the Board annually	Section Two: Income	No delegation	Up to £250	Up to £250	Up to £5,000	£5,000 to £45,000 Finance and Resources Committee >£45,000 Board and DfE approval

Ref	Process	Refer to	Delegation Limits				
			School Business Manager (SBM), Trust Finance Manager (TFM)	Headteacher (HT)	Trust Accountant (TA)	Chief Finance Officer (CFO)	Chief Executive Officer (CEO)
		those which might give rise to criticism of the Trust by Parliament, and/or the public, and/or the media					
18.	Borrowing	Section Two: Other Transactions	No delegation	No delegation	No delegation	No delegation	To seek approval from the Board and the DfE
19.	Giving of gifts	Section Two: Other Transactions	No delegation	No delegation	No delegation	No delegation	Up to £200 per item and no more than £1,000 in any one year PROVIDED THAT gifts of low intrinsic value (less than £30) may be given without prior referral providing that the terms of the Trust's Gifts and Hospitality Policy (Appendix C) are not compromised
	Receiving of gifts and hospitality	Section Four: Appendix C	Must be in line with the Trust's Gifts and Hospitality Policy (Appendix C), the Trust's Anti-Corruption and Bribery Policy (Appendix E) and the Trust's Anti-Fraud Policy (Appendix F).				

Ref	Process	Refer to	Delegation Limits				
			School Business Manager (SBM), Trust Finance Manager (TFM)	Headteacher (HT)	Trust Accountant (TA)	Chief Finance Officer (CFO)	Chief Executive Officer (CEO)
				appointment definition			
23.	Authority to appoint staff to post not on approved staffing establishment	<p>Accountability framework and Trust policies.</p> <p>All recruitment will be managed through adherence to central HR process.</p> <p>Decision needs to consider the impact on the annual budget and reserves. Ref 10 and 11 applies</p>	No delegation	Headteacher with ratification of the LGB and CEO	No delegation	No delegation	Central Team - with ratification by the Board
24.	Authority to set up initial payroll for each Academy for submission to payroll	Accountability framework and Trust policies	No delegation	No delegation	No delegation	Any new payrolls	Any new payrolls
25.	Authority to approve standing data forms affecting pay, new	Accountability framework and Trust policies	No delegation	All Academy changes	No delegation	All Central changes	All Central changes

secondary schools and 10% and 13% for primary schools.

- Non-Staff Costs % - the target range has been set between 24% and 27% for secondary schools and 21% and 24% for primary schools.
- Revenue Reserve % - the target range has been set between 5% and 10% for both secondary schools and primary schools.

Balancing the Budget

- 4.22 A monthly comparison of budgeted income and expenditure and actual income and expenditure will identify any potential surplus or shortfall in funding in-year. If shortfalls are identified opportunities to increase income will 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 be revised until recurring levels of income and expenditure are in balance. If a potential surplus is identified, this may contribute to the levels of reserves in accordance with the Trust's Investment and Reserves Policy (see Appendix B) as an aid to medium term planning.

Finalising the Budget

- 4.23 Once the different options and scenarios have been considered, an individual Academy budget will be drafted by the School Business Manager and Headteacher for approval by the CFO/CEO in liaison with each LGB. Subsequently, each Academy budget passes to the Trust Board for final approval. The budget is then communicated to all staff who have responsibility for budget lines so everyone is aware of the overall budgetary constraints.
- 4.24 The budget will be accompanied by a statement of assumptions and hierarchy of priorities so that if circumstances change, it is easier for all concerned to take remedial action. The budget will be used as a working document, which may need revising throughout the year as circumstances change.

Monitoring and Review

- 4.25 Monthly narrative reports will be prepared by the School Business Manager using BPS, the budgeting software. These are completed by the deadline of the 10th working day after month end unless otherwise communicated. The reports will detail actual income and expenditure against budget for the Trust Accountant/Headteacher and at a summary level for the CEO/Chief Finance Officer and LGB.

- 4.26 In some cases there will be unforeseen financial challenges which could lead to an overspend against the budget. For example, a water/gas leak or a loss to some aspect of the asset. As a result, the Chief Finance Officer will discuss the situation with the Headteacher and School Business Manager to seek a resolution.
- 4.27 Purchase orders which create an overspend on a budget will only be approved with a clear business case and the prior approval of the Headteacher and School Business Manager with due regard to the Schedule of Financial Delegations. This may need approval from the Trust Board depending on the amounts involved.
- 4.28 The budget monitoring process will be effective and timely in highlighting variances in the budget so any anomalies can be investigated and action taken where appropriate. For example, if a budget overspend is forecast, actions will be agreed to mitigate the financial impact through planning to underspend on another element of the budget.
- 4.29 If the monitoring process identifies an overspend during the year which would result in a deficit position and/or a significant variance to the budget at the end of the year this will be reported at the earliest opportunity to the Trust Board with a proposed recovery plan.
- 4.30 The Trust Accountant will prepare consolidated monthly management accounts with the Chief Finance Officer for review by the Chair of the Board, CEO and the Chair of the Finance and Resources Committee on a monthly basis and for review by the Board of Directors and Finance and Resources Committee on a termly basis.

5. Payroll

- 5.1 The main elements of the payroll system are:
- staff appointments;
 - terminations
 - pension deductions;
 - national insurance and tax deductions;
 - payroll administration and
 - third party payments

Staff Appointments

- 5.2 See Scheme of Delegation for each Academy.
- 5.3 All appointments are subject to the structure being affordable and any appointments outside

of the approved establishment need be contained within the annual budget. Any staffing changes that may require the use of Academy reserves need to be approved by the CEO.

- 5.4 The CEO has the authority to appoint staff within the Central Trust Functions subject to appointments or changes to structure being affordable within the central budget.
- 5.5 The School Business Manager/Trust HR Team shall maintain personnel files (whether physical or electronic) for all members of staff which include contracts of employment. All details relating to staff pay shall be kept up to date in EduPay, the payroll software. All personnel changes must be notified, in writing, to the School Business Manager/Trust HR Team.

Payroll Administration

- 5.6 All staff are paid monthly using data stored in EduPay. This includes:
- contractual information including salary, weekly hours, paid weeks;
 - bank account details;
 - taxation status;
 - personal details and
 - and deductions or allowances payable.
- 5.7 Changes to this key data in payroll can only be submitted by the Nominated employees with the express approval of the Headteacher. Advice from the Chief Finance Officer should be sought prior to salary changes as a result of re-evaluation of roles, whether permanent or temporary. Any key data amendments must be authorised by the Headteacher. Changes to key data will be checked against approved documentation by the School Business Manager and signed off by the Headteacher before the payroll is processed for payment.
- 5.8 Payroll production requires the Academy to comply with the necessary deadlines for the production of both the support staff and teachers' payroll.
- 5.9 In line with the payroll calendar, provisional reports are to be produced for checking by the School Business Manager and Headteacher. The process must include, but is not limited to, a check for a variation to gross/net pay from the previous month, contract changes, appointments, the absence of leavers from the previous month, additions to and deductions from pay, occupational and statutory sick pay and parental pay, ad-hoc payments and expenses.
- 5.10 The Headteacher must check a minimum of 5% of teacher and support staff salaries on the

gross and net pay variance report and initial each check to confirm that the salary is correct.

- 5.11 The School Business Manager will submit any corrections to payroll within the specified deadline.

Payroll Payments

- 5.12 After any further amendments have been processed, the final reports, including the Payroll Payments Report, will be released to the academy. The Payroll Payments Report must be checked and signed by the School Business Manager and Headteacher, and returned to the Payroll and Pensions Manager by the specified timescale. The gross pay figure on the Monthly Data Report is checked to ensure that it agrees to the Gross to Net Pay Variance Report and signed by the School Business Manager and Headteacher. Where there are differences these are annotated and initialled by the Headteacher.
- 5.13 All salary payments are to be made by BACS. In exceptional circumstances, faster payments will be made following confirmation of the amount from the School Business Manager. Payments will be raised and signed in line with the Scheme of Financial Delegations.
- 5.14 The payroll system automatically calculates the deductions due from payroll to comply with current legislation. The major deductions are for tax, National Insurance contributions and pensions. The amounts payable are summarised on the gross to net pay print. Payments to the deducting organisations are made by BACS payment.
- 5.15 The Payroll and Pensions Manager will select three employees at random each month and check the calculation of gross to net pay to ensure that the payroll system is operating correctly.
- 5.16 After the payroll has been processed the nominal ledger will be updated using a journal posted by the School Business Manager. Postings will be made both to the payroll control account and individual cost centres. The School Business Manager must review the payroll control account each month to ensure the correct amount has been posted from the payroll system and matches the net pay being made to employees and deductions paid to HMRC etc. Differences must be investigated and corrected on a monthly basis with a clear record of how the difference arose and how it was dealt with.
- 5.17 On an annual basis the School Business Manager, or delegated officer, must check for each

signature of the budget holder or be confirmed by email, and must be forwarded by email to the Trust Finance Manager/School Business Manager who will check to ensure adequate budgetary provision exists. The Trust Finance Manager/School Business Manager will review all outstanding orders and cancel any that are no longer required.

- 6.6 Purchase orders are not required for costs and service level agreements that are renewed on an annual basis, have been approved as per the Schedule of Financial Delegations and the monthly cost is a fixed amount. Where the actual final cost is dependent upon the amount of work undertaken/usage e.g. charges for agency staff/electricity charges, a purchase order is to be raised.

Orders up to £75,000

- 6.7 One quote required up to £10,000 with best value being realised. At least three written quotations should be obtained for all orders between £10,000 and £75,000 to identify the best source of the goods/services. Written details of quotations obtained should be prepared and the Headteacher must complete a justification statement where three written quotations cannot be secured, or if the decision is to go with a quote other than the lowest cost option. The quotes and any statement are referred centrally for review and sign off by the Chief Financial Officer.

Orders over £75,000

- 6.8 All goods/services ordered with a value over £75,000, or for a series of contracts, which in total exceed £75,000, must be subject to formal tendering procedures and made in accordance with the Procurement Section. This is the total value of the contract and not the annual cost. Advice must be sought from the Chief Finance Officer if any goods or service contracts will exceed this threshold.
- 6.9 Refer to the Procurement Section for information on the various forms of tender and the procedures to be followed. *All purchases above £75,000 are to be referred to the Chief Financial Officer for a tender reference number and guidance on the appropriate procurement method to be used. This will include a review performed at Trust level to see if the contract can be procured centrally to obtain best value.*

Goods Received and Invoicing

- 6.10 The Trust will define on all orders the appropriate arrangements for the delivery of goods to the Academy. On receipt, a detailed check of the goods received against the goods received

Section Three:

Operation Framework

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School Business Manager

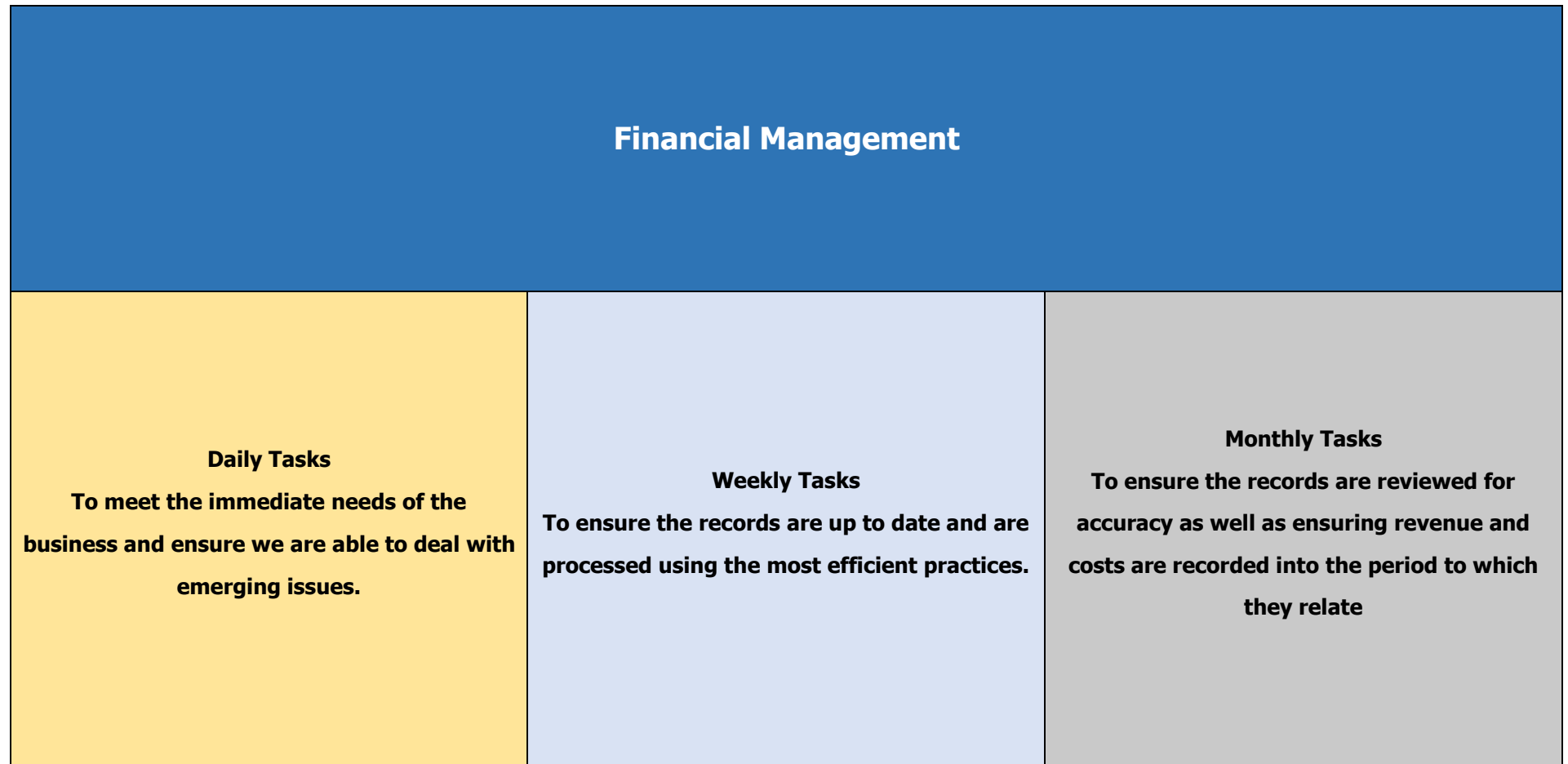
Headteacher

Governance

BLT Central Team

Operating Framework

For each group we consider:-



School Business Manager

Ad- Hoc Tasks

Process Correction Journals

Consideration – You should always consider why there is a need to complete a correction journal as this should only be necessary when the original transaction was incorrectly posted. At this point consider whether there is a wider learning point and the need to amend current practice

Process Sales Invoices

Consideration – Need to ensure that where others used out facilities or services that they are invoiced in a timely manner to support the Trust's overall cash position

Governance	
Monthly Tasks – Local Level	
Review monthly reports	Consideration – You should review the financial management information provided, and raise any specific questions with the CFO in advance of specific governance meetings to ensure that full responses can be provided

BLT Central Team	
Management Information	Consideration – Provide CEO with management information that identifies level of compliance with Financial Regulations.
Ad-Hoc Tasks	
Internal Reviews – sample checking	Consideration – To determine adequacy of internal controls and review a sample of transactions for compliance with Financial Regulations including journal entries. These findings will be reported back to the Headteacher and Audit and Risk Committee
System Administration	Consideration – Maintaining appropriate levels of access for Sage Accounting users
Financial Training and Development (agree frequency)	Consideration – Providing ongoing CPD opportunities including what details should be recorded in Sage Accounting.

Section Four:

Policy Appendices

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- Appendix A – MultiPay Card Policy
- Appendix B – Expenses Policy
- Appendix C – Gifts and Hospitality Policy
- Appendix D – Conflict of Interest Policy
- Appendix E – Anti-Corruption and Bribery Policy
- Appendix F – Anti-Fraud Policy
- Appendix G – Lettings Policy
- Appendix H – Investments and Reserves Policy

3.4 Keep passwords secret

If you register with a particular site you will be asked to enter a user name and password. Keep passwords completely secret – as you would with cash machine PINs.

3.5 Read delivery and returns policy before buying

Read delivery and returns policy on the home page before completing on-line transactions. Check you can return any unsatisfactory items and if you can get a refund. Websites should ideally cover delivery methods, delivery costs, currency applied, taxes applied, returns and refund policy and a contact telephone number or e-mail address.

3.6 Save and print a record of your transaction

- 4.6 Claims which have not been approved in compliance with this policy will not be processed and will be returned. Self-authorised claims will not be accepted for payment under any circumstances and if a member of staff attempts to submit a false claim it will be treated as a serious matter which may lead to disciplinary action.
- 4.7 Any questions about the reimbursement of expenses should be put to an individual's line manager before the relevant costs are incurred.

5 TRAVEL EXPENSES

- 5.1 The Academy will reimburse the reasonable cost of necessary travel in connection with Academy business. The most economic means of travel should be chosen if practicable/possible. The following are not treated as travel in connection with Academy business:

- 5.1.1 travel between a member of staff's home and usual place of work;
- 5.1.2 travel which is mainly for a member of staff's own purposes;
- 5.1.3 travel which, while undertaken on the Academy's behalf, is similar or equivalent to travel between a member of staff's home and usual place of work;
- 5.1.4 travel costs associated with non-mandatory full-time or part-time academic courses or professional qualifications that have not been approved by the Academy

5.2 Trains

Staff will only be reimbursed for the cost of standard class travel unless expressly authorised by the Headteacher/CFO. A receipt should be obtained and uploaded to the EduPay Employee Portal and the reason for travel detailed.

5.3 Taxis

Staff should not take a taxi when there is public transport that would not greatly increase the journey time. However, where it is cost effective or more practical (e.g. several people travelling; time constraints; for reasons of personal security; heavy luggage), staff travel by taxi may be permitted. A receipt should be obtained and uploaded to the EduPay Employee Portal and the reason for travel detailed.

5.4 Car

- 5.4.1 Where it is cost effective or more practical for a member of staff to use their own car for business travel (e.g. several people travelling; time constraints; for reasons

of personal security; heavy luggage), and they have been authorised to do so, staff can claim a mileage allowance on proof of mileage in accordance with the current authorised mileage rates authorised by HM Revenue & Customs. These are currently 45p per mile, with a further 5p for additional passengers. Staff can also claim for any necessary parking costs which need to be supported by a receipt or the display ticket.

5.4.2 Any vehicle used to travel on Academy business must be insured for business travel purposes. A member of staff can be required to evidence this on request.

5.4.3 When calculating mileage the normal commuting distance (i.e. the distance between a member of staff's home and usual place of work) must be deducted, unless the claim is in addition to their normal commute.

5.4.4 Postcodes of the journey start and end points, the normal commuting mileage (where relevant) and the reason for travel must be detailed.

5.5 **Air travel**

If staff are required to travel by plane in the course of their duties they should discuss travel arrangements with the Headteacher/CFO in advance. Where possible, arrangements will be made by the Academy on the member of staff's behalf but where this is not possible staff will be advised of the documentation that they will need to submit to reclaim expenses.

5.6 The Academy will not reimburse any penalty fares, parking fines or driving offences that staff may incur while travelling on Academy business.

6 **ACCOMMODATION AND OTHER OVERNIGHT EXPENSES**

6.1 If staff are required to stay away overnight in the course of their duties they should discuss accommodation arrangements with the Headteacher/CFO in advance. Where possible, arrangements will be made by the Academy on a member of staff's behalf, but where this is not possible the member of staff will be advised of the documentation that they will need to submit to reclaim expenses.

6.2 When staff are required to stay away overnight in the course of their duties, to the extent that these are not included in the cost of accommodation, the Academy will reimburse their reasonable out-of-pocket expenses provided they are supported by receipts for the following:

6.2.1 breakfast up to a maximum of £10 a day; and

6.2.2 lunch up to a maximum of £10 a day; and

APPENDIX C

GIFTS AND HOSPITALITY POLICY

Key Definitions

Gifts – any item, cash or goods, received, given or offered for which no payment or service was given or received in return.

Gifts are deemed to include:

- Goods provided for personal or other private use
- Personal services
- Loans of equipment, vehicles etc for personal use
- The provision of goods or services at preferential cost for personal or other private use
- Vouchers

Hospitality – defined as any food, drink, accommodation or entertainment provided free of charge or heavily discounted.

Scope

This policy applies to all Members, Trustees, Governors, permanent, fixed term and casual staff; contractors, consultants and third parties acting on behalf of the Trust (or any Academy within the Trust); all students (previous and current of any Academy within the Trust) and their families.

This policy should be read in conjunction with the Trust's Anti-Corruption and Bribery Policy set out in Appendix E and the Trust's Anti-Fraud Policy set out in Appendix F.

Gifts

Individuals must consider carefully whether it is appropriate to give or receive a gift. If in doubt, advice should be sought from the CEO regarding the giving of any gift or in line with this Policy regarding the receipt of any gift – before purchase or receipt of any item.

Capitation is allocated for pupil resources and must never be used for the purchase of gifts for paid employees. Budget holders wishing to reward volunteers for providing services to enhance pupils' learning should seek advice from the CEO before making any purchases.

Gifts of low intrinsic value (less than £30) such as promotional calendars, diaries or small tokens of gratitude may be given or accepted without prior referral providing that this policy's conditions are not compromised.

On occasions where it is deemed appropriate (and prior approval has been obtained from the CEO in relation to the giving of any gifts in accordance with the section 6 of the Schedule of Delegations) to give or receive more than one gift in any one academic year and the total value of all gifts exceeds the £30 threshold, the declaration procedure will apply.

Vouchers received over £50 in value should be used as part of an Academy's expenditure.

Staff must base all purchasing decisions and negotiations for contracts solely on the principles of best value to ensure that goods and services are purchased in the most economic, efficient and effective manner to meet an Academy's needs. An Academy requires staff who have official dealings with contractors and other suppliers of goods and services to avoid conducting any private business with them by any means other than through normal commercial channels. If unsolicited gifts of a substantial nature (over £100 in value) arrive from contractors they should be returned with a polite explanation that the Trust's policies do not allow their acceptance. Declined gifts should still be declared.

Hospitality

Hospitality can take a variety of forms, some of which staff may accept, some of which should be declined.

Staff may be offered hospitality as a normal business practice in a way that is directly linked to their role. Examples of this kind of hospitality include the offer of refreshments at business meetings or the offer of lunch or dinner at the end of an official engagement. This kind of conventional hospitality may be accepted.

Staff may also be offered other forms of hospitality which are not related to their role and are not linked to Academy business. This might include substantial offers of social functions, travel or accommodation, offers of tickets and invitations to sporting, cultural or social events. These forms of hospitality should be declined.

If any member of staff is in doubt about whether it is appropriate to accept any offer of hospitality, advice should be sought from the Chief Finance Officer (CFO), who may also seek the advice of the Headteacher of the relevant Academy and/or the CEO of the Trust.

Staff must never canvas or seek gifts or hospitality.

Declaration Procedure

Members, Trustees, Governors and staff must record the giving or receipt of gifts and hospitality above the £30 threshold by completing a Declaration of Gifts and Hospitality Form (Annex C1). The declaration should be approved by the Headteacher for staff at the relevant Academy and CEO, as the Accounting Officer, for Members, Trustees and Governors. The SBM of each Academy will maintain the Register for Gifts and Hospitality (Annex C2) for declarations over £30 in value on behalf of the Trust and the Trust Accountant will maintain such register for the Trust.

Monitoring and Evaluation

The SBM will report the contents of the register to:

- the CEO at the end of each school term.
- the Trust's accountants and auditors as part of the annual year end procedures.

Failure to Comply

In all instances where there is a reasonable belief that there has been a failure to declare, the CEO will conduct a formal investigation of the situation. Employees may be subject to disciplinary procedures to pursue potential matters of misconduct.

It is a criminal offence for an employee of the Trust to corruptly accept any inducement or reward for doing, promising or refraining from doing anything in the course of their employment, or corruptly showing favour or disfavour, in the handling of contracts. In acting corruptly the employee would demonstrate their intention to purposefully act with a lack of probity and with a disregard for the implications of their actions for the Trust

Annex C1

Declaration of Gift or Hospitality

Please indicate by ticking box A, B or C whether you have been offered and declined, have accepted a gift or hospitality, or have given a gift.

Name:	
Position:	

A	I have been offered a gift / hospitality which I have declined
B	I have been offered a gift / hospitality which I have accepted
C	I have given a gift with a value of £30 or above

Declaration details		
Name of external organisation and their relationship with the Trust/Academy.	Nature of interest / gift / hospitality	Estimated value if applicable

I believe my objectivity and independence in relation to the above external organisation has not been impaired in any way by the offer of gifts or hospitality.

SIGNED (Recipient)

Date

NAME (capitals)

SIGNED

Headteacher/

Chair of Governors

Date

NAME (capitals)

Completed forms should be sent to the Chief Finance Officer to enter in Register.

For office use only

Entered in Register	Date:	Reference:

Annex C2

Declaration of Gifts & Hospitality Register

Date of entry	Name of Trustee, Governor or member of staff	Estimated Value £	Nature of gift / hospitality	Supplier of gift / hospitality	Declaration Form Reference

9. Related party transactions

- 9.1. Where there is a proposed financial transaction between a Trustee and any Academy within the Trust, or any transaction or arrangement involving Trustee benefit:
- The benefit must be authorised in advance.
 - The Board of Directors expects the affected Trustee to be absent from any part of any meeting where the issue is discussed or decided.
 - The affected individual should not vote or be counted when deciding whether a meeting is quorate.
- 9.2. Where there is a conflict and the affected Trustee does not stand to gain any benefit, and there are no specific governing documents or legal provisions about how the conflict should be handled, the affected Trustee should declare the interest.
- 9.3. The remainder of the Board of Directors must then decide what level of participation, if any, is acceptable on the part of the conflicted Trustee. The options might include, but are not limited to, deciding whether the conflicted Trustee:
- Having registered and fully declared the interest, can otherwise participate in the decision.
 - Can stay in the meetings where the decision is discussed and made, but not participate.
 - Should withdraw from the decision-making process in the way described above.
- 9.4. In deciding which course of action to take regarding a conflict of interest, Trustees:
- Must always make their decisions in the best interest of the Trust and its Academies.
 - Should always protect the Trust's reputation and be aware of the impression that their actions and decisions may have on those outside the Trust.
 - Should always be able to demonstrate that they have made decisions in the best interests of the Trust and its Academies, and independently of any competing interest.
 - Should require the temporary withdrawal of the affected Trustee where the interest is relevant to a high-risk or controversial decision or could, or could be seen to, significantly affect the Trustee's decision-making.

- Read and understood the policy.
- Agreed to comply with the policy.

13.2. This policy will be included in the publication scheme on the Trust's website and will be made available to the public.

- 11.3 If staff are unsure whether a particular act constitutes bribery or corruption, or if they have any other queries, these should be raised with the CEO.

12. PROTECTION

- 12.1 Individuals who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. The Trust aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 12.2 The Trust is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If staff believe that they have suffered any such treatment, they should inform the CEO immediately. If the matter is not remedied, and the member of staff is an employee, they should raise it formally using the Trust's Grievance Policy.

13. TRAINING AND COMMUNICATION

- 13.1 Training on this policy forms part of the induction process for all new individuals who work for the Trust. All existing workers will receive regular, relevant training on how to implement and adhere to this policy.
- 13.2 The Trust's zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of any business relationship with them and as appropriate thereafter.

14. BREACHES OF THIS POLICY

- 14.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.
- 14.2 The Trust reserves the right to terminate its relationship with other individuals and organisations working on its behalf if they breach this policy.

SCHEDULE - POTENTIAL RISK SCENARIOS: 'RED FLAGS'

The following is a list of possible red flags that may arise during the course of staff working for the Trust and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

If staff encounter any of these red flags while working for the Trust, they must report them promptly using the procedure set out in the Whistleblowing Policy:

- 1 they become aware that a third party engages in, or has been accused of engaging in, improper business practices;
- 2 they learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a 'special relationship' with foreign government officials;
- 3 a third party insists on receiving a commission or fee payment before committing to sign up to a contract with the Trust, or carrying out a government function or process for the Trust;
- 4 a third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- 5 a third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business;
- 6 a third party requests an unexpected additional fee or commission to 'facilitate' a service;
- 7 a third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
- 8 a third party requests that a payment is made to 'overlook' potential legal violations;
- 9 a third party requests that they provide employment or some other advantage to a friend or relative;
- 10 they receive an invoice from a third party that appears to be non-standard or customised;
- 11 a third party insists on the use of side letters or refuses to put terms agreed in writing;
- 12 they notice that the Trust have been invoiced for a commission or fee payment that appears large given the service stated to have been provided;
- 13 a third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to the Trust; or
- 14 they are offered an unusually generous gift or offered lavish hospitality by a third party.

- Providing a professional service to users of the academy's premises

5. Health and safety

5.1 No smoking is allowed on any site.

5.2 The academy has a responsibility to work within the framework of the law; however, hirers must take all reasonable steps to prevent injury, loss or damage to any person or property for the duration of the let. Hirers are responsible for arranging any first aid provision for the members of their organisation. In the event of an emergency, first aid items are held by the site supervisor.

5.3 Hirers must sign all required paperwork and abide by Academy rules, code of conduct and Trust Health and Safety Policies and agree all T&C's associated with the letting.

5.4 The academy's telephone system may be used in the event of an emergency. The academy reserves the right to cancel any letting where the hirer fails to comply with health and safety issues (see Academy Booking Terms and Conditions).

5.5 The academy requires any electrical items used to have a PAT certificate. The Business Manager in consultation with the Site Manager will monitor the number of people on site with regard to safety in the event of a fire and insurance.

6. Safeguarding

6.1 All hirers who provide activities for children and young people are required to complete the Academy Booking Terms and Conditions template which indicates they have appropriate Health & Safety, Child Protection, Safeguarding, etc, policies. Lettings will not be made to persons under the age of 18, or to any organisation or group or individual with an unlawful or extremist background. If a particular letting involves contact with academy students all personnel involved must have appropriate recruitment and vetting checks (DBS). The Trust will not hire out premises to current pupils/students.

It is the responsibility of the academy to ensure that the Hirer has ensured adequate supervision, ratios and up to date and adequate DBS checks. The Hirer will maintain and provide copies to the school, in relation to DBS evidence, contact details (including all emergency contacts), changes in staffing, responsibilities and absence. These checks must be made by prior arrangement with at least half a term's notice in advance to ensure that the checks can be carried out prior to the commencement of any letting. Any adults working with BLT students (for example, at an after school sports club) must be appropriately qualified.

In general, the cash shall be invested in short term investment accounts, with an average duration of less than one year. Proposal for longer term investments would need further approval of the Finance and Resources Committee.

The Chief Finance Officer has delegated responsibility to conduct investment transactions as required, in line with the authorised signatories registered with the investment institution.

RESERVES

Aims and Objectives

The Trust aims to monitor the reserve levels held, having due regard for the nature of income and expenditure streams, the need to match income with commitments and the nature of reserves.

Guidelines

The Directors must review the reserve levels of each Academy and the Central MAT funds annually. This review should encompass the nature of the income and expenditure streams, the need to match income with commitments and the nature of reserves.

Under its Funding Agreement with the Secretary of State for Education the Trust is permitted to hold unlimited reserves at the year end.

The Finance and Resources Committee have reviewed these reserve levels and believe that they should provide sufficient working capital to cover delays between spending and receipt of grants and to allow for unexpected emergencies.

Reference is made to 'free' reserves, which is the combined total of Unrestricted and General Annual Grant (GAG) reserves.

'Income' is determined as the combined total of Unrestricted and General Annual Grant (GAG) income.

The Trust will aim to maintain free reserves at a minimum level of 5% of income up to a maximum level of 10% of income.

This Policy will be reviewed on an annual basis.