Finance Manual
Version March 2026

EXTRACTS FROM THE MANUAL RELATED TO STAFF EXPENSES, ANTI-FRAUD PROCEDURES AND OTHER FAQs

This extract was made as a user-friendly version containing the information that most staff will need most frequently. For more detailed questions, please refer to the full Manual or speak to your school business professional.

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3 Compliance and infringements

Compliance with these financial regulations is compulsory for all staff connected with the Trust. A member of staff who fails to comply with these financial regulations may be subject to disciplinary action under the Trust's disciplinary policy. The Board of Directors will be notified of any such breach through the Audit Committee.

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4 Roles and Responsibilities

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4.8 Local Academy Committees

LACs support and challenge school leaders on financial performance within the delegated budget, but cannot approve budgets (which sit with the Board/Executive). Key financial roles (per the Scheme of Delegation) include:

- Receiving and scrutinising school budget monitoring reports quarterly.
- Challenging on variances and value for money.
- Approving local contracts and payments within scheme limits (typically low-value).
- Receive, review and monitor the school register
- Maintaining a register of interests and monitoring conflicts/gifts/hospitality.

4.9 Headteachers and school business professionals (SBPs)

Headteachers are budget holders for their schools and retain overall accountability for school finances, delegating operational delivery to SBPs. Key responsibilities include:

- Headteachers:
  - Preparing and owning the school budget within the Trust framework; monitoring income/expenditure; ensuring value for money; approving local contracts/payments within scheme limits; notifying the Finance Manager of variances or concerns.
  - Ensure that staff in their school are made aware of the existence and content of the Trust's Finance Manual through the induction process.
- school business professionals: Day-to-day operation of school finances, including purchase orders, invoice processing, income collection, petty cash, bank reconciliations and compliance with Trust procurement thresholds; monthly returns to central finance team; maintaining local asset registers.

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4.12 All staff

All staff must safeguard Trust assets, ensure economy/efficiency in resource use, comply with financial procedures and report irregularities immediately to their line manager, SBP or the Trust Finance Manager.

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6 Electronic authorisation

Many of the authorisation and sign-off requirements in this manual may be fulfilled electronically, and the Trust actively encourages the use of digital workflows and approval systems in place of paper-based processes. Electronic authorisation carries the same legal and audit weight as a handwritten signature, provided the following conditions are met:

- Identity: the system must positively identify the approver — for example, by requiring a named log-in, a role-based approval action within a workflow system, or a digital signature. Generic or shared log-ins are not acceptable for authorisation purposes.
- Time-stamp: the approval must be automatically date- and time-stamped at the point it is given.
- Immutability: the approval record must not be editable or deletable after the fact. A system that allows the audit trail to be altered does not satisfy this requirement.
- Accessibility: approval records must be retrievable for inspection by auditors, the Responsible Officer or the Board for the full document retention period applicable to the underlying transaction.

Authorisations given by untracked means — including informal email replies, verbal confirmations, or approval by a person using another individual's log-in credentials — do not constitute valid authorisation under this manual and will be treated as unauthorised transactions.

The Finance Manager is responsible for maintaining a current list of approved digital authorisation methods in use across the Trust, reviewing their suitability annually, and bringing any concerns to the attention of the COO and Audit Committee.

7 Receiving Gifts, Hospitality and Conflicts of Interest

The Trust is committed to conducting its affairs to the highest standards of probity, propriety, openness, integrity and accountability, having regard to the Seven Principles of Public Life (Nolan Principles):

- selflessness
- integrity
- objectivity
- accountability
- openness
- honesty and
- leadership.

All staff, Trust Directors, LAC members and Trust Members are expected to observe these principles in the conduct of Trust business.

It is a criminal offence under the Bribery Act 2010 to accept corruptly any gift or consideration as an inducement or reward for doing, or refraining from doing, anything in an official capacity, or for showing favour or disfavour to any person in an official capacity.

Members of staff, trustees and governors must not accept gifts, rewards or hospitality (or have them given to members of their families) from any organisation or individual with whom they have contact in the course of their work, where doing so could influence — or be seen to influence — a business decision. The frequency and scale of hospitality accepted should not be significantly greater than the Trust would be likely to provide in return.

Where it is not straightforward to decide whether a gift or offer of hospitality is acceptable, it should be declined or advice sought from the Company Secretary before accepting.

Each Trust school and the central Trust office must maintain a register of gifts and hospitality, recording all gifts and hospitality received where the value exceeds £25. The designated officer responsible for maintaining the register at each school is the Headteacher (or SBP on their behalf). At the central Trust level, the Company Secretary is responsible. Staff in receipt of gifts or hospitality above this threshold are required to notify their designated officer promptly.

Members of the Board, Local Academy Committees, the Headteachers, SBPs, central team and all those involved in procurement must disclose in the Trust's register of interests (maintained by the Company Secretary) any business interests they hold — including directorships, shareholdings or other appointments of influence — in companies or organisations that have, or might have, dealings with the Trust. Disclosures must also cover relevant business interests of close relatives (such as a spouse, partner or parent) where those interests could exert influence.

The register of interests must be:

- Kept up to date, with individuals responsible for updating their own entries promptly when circumstances change.
- Published on the Trust's website, in line with DfE requirements.
- Made available for inspection on request.

The existence of a register of interests does not remove the duty to declare interests verbally at meetings whenever they are relevant to matters under discussion. Where an interest is declared, the individual concerned must withdraw from that part of the meeting and must not vote or seek to influence the decision.

No person may be a signatory to a Trust contract in which they have a personal or financial interest.

8 Related Party Transactions

8.1 Definition and scope

A related party transaction (RPT) is any transaction between the Trust and a person or organisation that is connected to it. Connected parties include:

- Any Director, Member, LAC member, Headteacher, SLT member, SBP or other senior employee of the Trust
- Any close family member of the above (including spouse, civil partner, parent, child or sibling)
- Any organisation in which any of the above holds a material interest (as director, trustee, shareholder, partner or otherwise)
- Any other academy trust or organisation with which the Trust shares a Director, Member or senior employee

The definition is intentionally broad. Where there is any doubt as to whether a transaction constitutes an RPT, it should be treated as one and referred to the Finance Manager and Company Secretary for a formal determination before proceeding.

8.2 Principles

The Trust may only enter into a transaction with a connected party where it can demonstrate that the arrangement:

- Is in the best interests of the Trust and its pupils
- Represents value for money compared to what could be obtained from an independent party
- Is conducted on arm's length terms — that is, on terms no less favourable to the Trust than those that would be agreed between unconnected parties in equivalent circumstances
- Are at cost
- Has been properly declared, assessed and approved in accordance with this section

The Trust will not enter into an RPT solely for the convenience of the connected party, or on terms that provide a personal financial benefit to any individual connected to the Trust.

8.3 Approval requirements

All proposed RPTs must be reported to the Finance Manager and Company Secretary before any commitment is made. The following approval thresholds apply:

Requirement	Threshold	Authority
Declaration and arm's length / Value for Money assessment	All RPTs, any value	Finance Manager and Company Secretary, before any commitment
Internal Board approval	All RPTs, any value	Board of Directors, before any commitment
Report to DfE online	All expenditure RPTs, any value	Finance Manager, before transaction confirmed

DfE prior written approval	Transactions exceeding £40,000 with the same related party in the same financial year	CEO; transaction must not proceed until approval received
DfE prior written approval	Any novel, contentious or repercussive transaction, regardless of value	CEO; transaction must not proceed until approval received

No contract may be signed, no order placed, and no payment made to a connected party until the required approvals have been obtained and documented. The individual with the conflict of interest must play no part in the decision-making process and must not be present during the relevant part of any Board or Committee discussion.

8.4 DfE notification and approval

For RPTs of £40,000 or above in any financial year, the Trust must seek prior written approval from the DfE before entering into the arrangement. The Finance Manager, advised by the Company Secretary, is responsible for preparing and submitting the DfE notification, which must include:

- A description of the transaction and the connected party
- The proposed value and duration
- Evidence of the arm's length assessment and value for money
- Confirmation of the Board's approval in principle

The Trust must not proceed with the transaction until written DfE approval has been received.

8.5 Register and accounts disclosure

The Company Secretary maintains a register of all RPTs, recording the connected party, the nature of the transaction, its value, the approvals obtained and the date entered into. The register must be reviewed at each Audit Committee meeting.

All RPTs must be disclosed in the Trust's annual report and financial statements in accordance with the Academies Accounts Direction, regardless of value. The Finance Manager is responsible for ensuring that all disclosable RPTs are notified to the external auditor and included in the accounts disclosures. Under-disclosure of RPTs is one of the most common causes of qualified audit opinions for academy trusts and will be treated as a serious compliance failure.

9 Anti-Bribery

The Trust has zero tolerance for bribery and corruption and seeks to comply in full with the Bribery Act 2010. To limit its exposure to bribery, the Trust will:

- Maintain a clear, proportionate Anti-Fraud and Anti-Corruption Policy (see Annex I), approved by the Board and reviewed annually.
- Embed awareness of the policy among all staff, associated persons and external organisations with whom the Trust has commercial relations.

- Encourage staff to be vigilant and to report any suspicion of bribery through the whistleblowing arrangements set out in Section 11.

Rigorously investigate all allegations of bribery in accordance with the Trust's disciplinary procedures, assisting the police and relevant authorities in any resultant prosecution.

Take firm action against any individuals found to be involved in bribery.

A full Anti-Fraud and Anti-Corruption Policy statement is set out in Annex I to this manual.

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10 Fraud and Irregularity

10.1 Definition

Fraud includes acts such as bribery, corruption, forgery, extortion, conspiracy, theft, embezzlement, misappropriation, false representation, concealment of material facts and collusion. For all practical purposes, fraud may be defined as: "the use of deception with the intention of obtaining an advantage, avoiding a loss, or causing loss to another party."

10.2 Internal fraud

Internal fraud or irregularity could include (but is not limited to):

- Theft of cash, equipment or stock.
- Unauthorised use of Trust equipment, including IT systems.
- Improper manipulation of computer programmes or data.
- Falsification of claims for travel, subsistence, overtime or time off in lieu.
- Collusion with others for illicit gain
- Staff attaching school charge cards to personal purchasing accounts (e.g. supermarkets, Amazon)

10.3 External fraud

External fraud could include (but is not limited to):

- Submission of false invoices or demands for payment for unsolicited goods.
- Contractor fraud (overcharging, sub-standard work, bid-rigging or collusion).
- Offers of bribes or inducements.
- Cyber-enabled fraud, including phishing, invoice redirection and impersonation fraud.
- Fraudulent claims for Trust funds.

10.4 Duty to report

All staff, Directors and LAC members have a duty to notify the Company Secretary immediately whenever any matter arises that involves, or is thought to involve, irregularity including fraud, corruption or any other impropriety. If the suspected fraud involves the Company Secretary or CEO, the concern should be reported directly to the Chair of the Audit Committee.

10.5 Escalation thresholds and response

Management action must increase in accordance with the following escalation thresholds. All thresholds apply before deducting any amounts recovered from insurance. All frauds and suspected frauds, however small, must be recorded in the losses register and reported to the next meeting of the Audit Committee.

Loss threshold	Action automatically triggered
Any amount	Manager informed; loss recorded in losses register
£5 or more	Company Secretary and CEO notified; follow-up by Company Secretary
£50 or more	Consider referral to police if criminal offence suspected
£100 or more	Fraud response team convened
£1,000 or more	Full Fraud Response Plan invoked, including Responsible Officer investigation
£5,000 or more	DfE notified (via the DfE's reporting arrangements for academy trusts)

10.6 Fraud Response Plan

The full Fraud Response Plan, including the composition of the fraud response team and detailed procedures, is set out in **Error! Reference source not found.** to this manual. The Responsible Officer (or approved provider) will investigate significant cases and prepare a report for the Audit Committee including recommended preventative measures.

10.7 Reporting to DfE

Any significant cases of fraud, theft or irregularity must be reported to the DfE (via Regions Group) in accordance with current DfE reporting requirements. The threshold for mandatory notification is currently £5,000 (or lower where the nature of the irregularity warrants it). The CEO, advised by the Company Secretary, is responsible for making this report promptly.

11 Whistleblowing

Whistleblowing, under the Public Interest Disclosure Act 1998 (as amended), is the disclosure by an employee or other party of malpractice in the workplace. A whistleblower may raise concerns about crime, civil offences, miscarriages of justice, danger to health and safety or the environment, financial irregularity, or the cover-up of any of these.

Any concern about financial or other malpractice at the Trust should normally be raised with the member of staff's immediate line manager or Headteacher. Where this is not possible or appropriate (for example, because the line manager may be implicated), concerns may be raised with the Company Secretary, the CEO or the Chair of the Board. If the concern involves the Company Secretary or the CEO, it should be raised directly with the Chair of the Audit Committee.

The Trust’s full whistleblowing procedure, including protections for whistleblowers and external reporting routes, is set out in the Trust’s Whistleblowing Policy, available from the Company Secretary. The Audit Committee is responsible for monitoring the effectiveness of whistleblowing arrangements and for ensuring all staff are aware of how to raise concerns.

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14 Payroll

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14.8 IR35 and Off-Payroll Working

The Trust's and Schools’ obligations

Where the Trust or one of the Trust’s schools engages an individual to provide services through a personal service company or other intermediary, it is responsible under the off-payroll working rules (Chapter 10, Income Tax (Earnings and Pensions) Act 2003, as amended) for determining whether, if the engagement were direct, the individual would be treated as an employee for tax purposes. If the answer is yes (see below), the Trust must deduct income tax and National Insurance contributions from payments made to the intermediary and account for these to HMRC, exactly as it would for an employee.

Getting this wrong exposes the Trust to significant HMRC liability, including unpaid PAYE, employer's NI, interest and penalties. This is an area of active HMRC enforcement in the public sector, including in education.

Status determination

Before engaging any individual contractor, consultant or interim member of staff through an intermediary, the Finance Manager (at Trust level) or school business professional (at school level) must:

- Carry out a status determination using HMRC's Check Employment Status for Tax (CEST) tool https://www.gov.uk/guidance/check-employment-status-for-tax or an equivalent documented assessment
- Record the determination in writing, specifying the factors considered and the conclusion reached
- Provide a written Status Determination Statement (SDS) to the contractor and their intermediary before the engagement commences

Where the determination concludes that the individual would be treated as an employee (an "inside IR35" determination), the Trust (at Trust level) or school business professional (at school level) must operate PAYE on payments to the intermediary. The Finance Manager / school business professional is responsible for ensuring payroll is set up to do this before any payment is made.

Where the determination concludes "outside IR35", the written SDS must be retained on file. The Finance Manager / school business professional must review outside-IR35 determinations at least annually and whenever the nature of the engagement changes materially.

Responsibility and escalation

The Finance Manager at Trust level and school business professional at school level is responsible for maintaining a register of all off-payroll engagements, recording the contractor, the intermediary, the start and end dates, the IR35 determination and the SDS. Any case where the IR35 status is uncertain at school level must be escalated to the Finance Manager, who should further escalate to the Trust's external payroll adviser or tax adviser before the engagement commences if required. The cost of obtaining that advice is a legitimate Trust expense.

No contractor engagement through an intermediary may commence until a written SDS has been issued. The Finance Manager / school business professional must bring the register to the attention of the external auditor each year.

15 Staff expenses and reimbursements

15.1 Principles

The Trust and its schools will reimburse staff for expenses that are necessarily, wholly and exclusively incurred in the performance of their duties on behalf of the Trust. No permission will be given for any expenses that are not explicitly permitted in section 15.2. Prior authorisation for expenses (see section 0) must be obtained in writing or electronically (see Section 6) before the expense is incurred. All claims must be supported by original receipts or equivalent evidence, and demonstrate value for money in the use of public funds. Retrospective approval is not permitted.

15.2 Eligible expenses

The following categories of expenditure are eligible for reimbursement:

- Business travel: the cost of travel necessarily undertaken in connection with Trust business, away from the claimant's normal place of work. Staff should use the most economical means of travel and accommodation available, consistent with the requirements of the journey. Although travel to and from one’s normal place of work is not reimbursable, travel from home to and from a non-normal venue is reimbursable, but limited to the excess over the normal commute if the route passes through or near the usual workplace.
- Subsistence: reasonable costs of meals and refreshments when a member of staff is required to be away from their normal place of work for a continuous period of five hours or more. Subsistence claims must be for actual expenditure evidenced by receipts — a flat daily allowance is not payable.
- Accommodation: the cost of overnight accommodation where an early start or late finish makes return to the claimant's home impractical. Accommodation must be of a reasonable standard; luxury hotels are not reimbursable. All accommodation expenses require prior approval from the CEO or, for the CEO's own claims, the Chair of the Board.
- Course and conference fees — where not booked centrally, subject to prior approval in line with the procurement thresholds in Section 16.2.
- Call costs: if a staff member incurs extra cost for making a work call from their personal mobile or home phone, the Trust can reimburse the actual cost of that call. Only the cost of the individual calls may be claimed; no portion of line rental, monthly contract fee or data

allowance is reimbursable. Claims must be supported by an itemised bill or screenshot identifying the relevant calls.

- Staff who make frequent business calls from a personal mobile are encouraged to discuss with the Finance Manager whether a Trust-owned or Trust-contracted device would be more appropriate.
- Eye tests for Digital Screen Equipment (DSE) users on request and a contribution of up to £25 per year contribution towards screen-only glasses for these users.
- The claimant’s authorising officer may approve reasonable meal costs if the staff member is way from their normal place of work for more than 5 continuous hours.
- The Trust CEO may approve reasonable meal costs in exceptional circumstances (e.g. very early starts or late finishes on the express request of the Trust)
- Other legitimate business costs — reasonable and necessary costs not listed above, subject to prior approval from the claimant's authorising officer.

15.3 Travel by private vehicle

Where a member of staff uses their own vehicle for business travel, mileage will be reimbursed at the HM Revenue & Customs approved mileage allowance payment (AMAP) rates, which can be found here: https://www.gov.uk/government/publications/rates-and-allowances-travel-mileage-and-fuel-allowances/travel-mileage-and-fuel-rates-and-allowances

These rates will be updated whenever HMRC revises the AMAP rates. Payment above these rates constitutes a taxable benefit and will not be made. Staff using their own vehicles for business purposes must hold a valid driving licence, appropriate business use insurance cover, and a current MOT certificate where required. The school business professional (at school level) or Finance Manager (at Trust level) may request evidence of these before processing a claim.

Reasonable parking charges and, where necessarily incurred, the London congestion charge (provided the use of a personal vehicle represents the most economical option including this charge), will be reimbursed.

Use of a personal private or hire (see below) vehicle is only reimbursable where it represents a more economical or practical option than public transport for the journey in question. Where public transport is a reasonable alternative, the lower of the mileage rate and the equivalent public transport cost will be reimbursed. Return journeys over 50 miles by car are reimbursed at public transport rates only.

15.4 Travel by public transport

Travel in Transport for London (TfL) zones: Oyster card / bank cards may be used for TfL travel; the journey history printout will be accepted as valid receipt.

Rail and bus fares are reimbursable at standard class only. First class travel is not reimbursable without prior written approval from the CEO (or, for the CEO, the Chair of the Board), which will only be given in exceptional circumstances. The cheapest available fare for the journey should be booked in advance wherever possible.

Air travel requires prior approval from the CEO for all staff, and from the Chair of the Board for the CEO. Economy class is the only reimbursable class.

Travel by private hire vehicle (taxi, e-bike) will only be reimbursed in exceptional circumstances (e.g. if the area is not covered by the public transport network, if heavy equipment being moved or similar)

15.5 Non-reimbursable expenditure

The following items will not be reimbursed under any circumstances:

- Alcoholic drinks of any kind, whether consumed individually or as part of a meal or event
- Personal items, including clothing, toiletries and personal entertainment
- Fines, penalties or charges (including parking fines, penalty charge notices and other penalties)
- Travel between home and the claimant's normal place of work (ordinary commuting)
- Costs arising from personal negligence or avoidable delay
- Upgrades to travel or accommodation beyond the standard specified above
- Expenses incurred by a spouse, partner, family member or other companion who is not a Trust employee travelling on Trust business
- Costs that have been or will be reimbursed by another organisation

Staff may not claim reimbursement for meals, refreshments or events provided to third parties (hospitality or entertaining). Any exceptions to this rule requires prior written approval from the CEO, regardless of amount and the expenditure must:

- Comply with Section 9 of this manual and Trust's Anti-Fraud and Anti-Corruption Policy (including Gifts and Hospitality) Policy (Annex II),
- Be modest and clearly in furtherance of the Trust's educational objects.

Reimbursement of calls made from a personal mobile phone may in some circumstances give rise to a taxable benefit. The Finance Manager is responsible for ensuring that such reimbursements are reviewed for PAYE and National Insurance implications and, where necessary, reported to HMRC or included in a PAYE Settlement Agreement. Staff will be notified if any tax liability arises from a claim.

15.6 Authorisation

All expense claims must be authorised by the claimant's line manager (see below) before they are incurred. No claim may be processed without a valid authorisation signature (or, where the school / Trust operates an electronic approval workflow, a documented electronic approval). Of the eligible expenditures (see section 15.2), the following categories of expenditure require prior authorisation from the claimant's line manager before the cost is committed or incurred:

- Any single item of expenditure expected to exceed £50
- Attendance at training events, conferences or external courses (see also Section 16.3)

Any hospitality or entertainment, regardless of the amount, must be approved by the CEO. The authorising officers for the advance approval of expenses and the approval of related claims are:

Claimant	**Authorising officer**
All school-based staff and SBPs	Headteacher

Headteachers	CEO
Finance Manager and COO	CEO
CEO	Chair of the Board of Directors
Directors and LAC members	Chair of the Board (or Chair of the relevant LAC for LAC member claims) – See section **Error! Reference source not found.**

No individual may authorise their own expense claim. Where the normal authorising manager has a conflict of interest in respect of a particular claim, the claim must be referred to the next level up.

CEO and senior leadership expense claims

The CEO's expense claims must be authorised by the Chair of the Board of Directors, or by a Director nominated by the Chair for this purpose, before payment. This requirement exists to maintain the independence of oversight over the most senior post-holder in the Trust and cannot be delegated to the COO, Finance Manager or any other member of staff.

Where the Chair is unavailable, the Vice-Chair or another Director nominated by the Chair may authorise in their place. The Finance Manager must not process a CEO expense claim that does not carry a valid Board-level authorisation, regardless of the amount.

The COO's expense claims must be authorised by the CEO, not the Finance Manager, for the same reason.

The Finance Manager's own expense claims must be authorised by the CEO or COO to maintain segregation of duties.

15.7 Claiming process

Claims must be submitted using the Trust’s or school's standard expense claim form, available from the Finance Manager or school business professional. Each claim must include:

- A clear description of the business purpose of each item
- Original receipts or, where unavailable, a written explanation of why a receipt could not be obtained (claims without receipts will only be accepted in exceptional circumstances and require CEO approval)
- For mileage claims, the journey start and end points and total miles claimed
- The authorising officer's dated signature or electronic approval

Claims must be submitted within one calendar month of the expenditure being incurred. Claims submitted more than three months after the date of expenditure will not normally be reimbursed without written approval from the CEO. The Finance Manager (at Trust level) and school business professional (at school level) is responsible for checking that claims are arithmetically correct, properly authorised, and supported by adequate evidence before processing.

Approved claims are paid by BACS directly to the claimant's bank account and must be processed as a payment run in the Trust-approved accounting system in the same way as any other Trust or school payment — that is, initiated by the Finance Manager or school business professional and authorised by two signatories in accordance with Section **Error! Reference source not found.**) before transmission. Approved claims will normally be paid within ten working days of submission.

15.8 Tax treatment

Reimbursements made within HMRC's approved rates and in accordance with this section are not subject to income tax or National Insurance. The Finance Manager (at Trust level) and the school business professional (at school level) are responsible for ensuring that any reimbursements that fall outside these conditions are reported correctly to HMRC, either through the payroll system or via a PAYE Settlement Agreement (PSA) as appropriate. The Finance Manager must review the Trust's expense reimbursement arrangements at least annually to ensure continued compliance with HMRC requirements.

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16 Purchasing and Procurement

16.1 Principles

The Trust seeks to achieve the best value for money from all purchases — meaning the right quality, quantity and timing at the best price available. The following general principles apply to all procurement activity:

- Probity: there must be no corruption or private gain involved in any contractual relationship of the Trust.
- Accountability: the Trust is publicly accountable for its expenditure and the conduct of its affairs.
- Fairness: all those who deal with the Trust are treated on a fair and equitable basis.
- Transparency: procurement decisions and the reasons for them must be capable of independent scrutiny and audit.
- Value for money: procurement must demonstrate economy, efficiency and effectiveness in the use of public funds.
- Social value: for all significant procurement, the Trust must consider the economic, social and environmental benefits that could be achieved, in accordance with the Public Services (Social Value) Act 2012.
- Sustainability: environmental impact, including carbon footprint and whole-life costs, should be considered alongside price in procurement decisions.

All staff involved in procurement must comply with the Trust’s conflicts of interest requirements (See Section 7) and must declare any personal interest in any supplier or potential supplier before participating in any procurement process.

16.2 Procurement thresholds and quotation requirements

The following thresholds apply to all procurement of goods, services and works. Where an individual item is below a threshold but multiple purchases from the same supplier in a twelve-month period are likely to exceed it, the higher threshold applies.

Value of purchase	Requirements
Up to £500	Budget holder may order; no formal quote required but value for money must be demonstrable
£500 - £1,999	Retain proof of 3 price comparisons or equivalent proof of value for money for individual items and contracts (except if buying from Framework Agreement)
£2,000 – £9,999	Minimum three quotations, obtained in writing or electronically (see below); approved by Headteacher or Finance Manager
£10,000 – £20,000	Minimum three quotations, obtained in writing or electronically (see below); approved by the CEO
£20,000 – £39,999	Minimum three quotations, obtained in writing or electronically (see below); Board approval required before order is placed
£40,000 – public procurement thresholds	Advertise a contract and run a buying process (see Section **Error! Reference source not found.**) for contracts >=£40,000 up to public procurement thresholds (revised annually), after which Procurement Act 2023 / Find a Tender Service obligations apply (see Section **Error! Reference source not found.**); Board approval required

Quotations may be obtained and submitted by any traceable means — including email, supplier portal, electronic procurement platform or letter. A quotation is only valid for these purposes if it is traceable to a named individual at the supplier, dated, and retained in retrievable form for the full retention period. Verbal quotations, text messages or informal online chat confirmations do not constitute valid quotations under this manual.

A full record of all quotations obtained must be retained by the school business professional or Finance Manager (as appropriate), regardless of the medium by which they were received. For electronic quotations, this means retaining the original email, portal submission or platform record in its received form — not a summary or transcription of it. Records must be retained for a minimum of six years and must be readily retrievable for audit purposes.

16.3 Routine purchasing process

Headteachers are responsible for managing their budgets and must ensure funds are not overspent. Monthly reports detailing actual expenditure and commitments against budget are shared by the SBP with the Headteacher every month.

All orders must be raised using the approved purchasing system (currently Civica FinancialsLive). All orders must be approved and adequate budgetary provision confirmed, before being placed. Headteachers may delegate this approval for all orders up to £1,000. Orders from £1,000 up to £10,000 must be approved by the Headteacher (for school-based expenditure) or Finance Manager (for central Trust expenditure) before being placed, who. Orders between £10,000 and £19,999 require CEO approval, orders of £20,000 and above require Board approval.

All invoices must quote an order number and be sent to the relevant school or the central Trust office. Invoices are entered on the accounting system and matched to the relevant purchase order and delivery confirmation by the school business professional or Finance Manager.

All goods are checked against the delivery note on receipt. A record of receipt must be created in the accounting system and any discrepancies with the order resolved before payment is made.

Where the Headteacher or other person with delegated authority is pursuing a query with a supplier, the Finance Manager or school business professional must be informed and kept updated on progress so that payment can be withheld appropriately.

Payment runs for all approved invoices that are due are created weekly by the Finance Manager (for central Trust payments) or school business professional (for school payments). Payment runs must be reviewed and authorised by two approved signatories before transmission. All payments are made by BACS.

16.4 Framework agreements

The Trust is encouraged to make use of pre-tendered framework agreements established by bodies such as the Crown Commercial Service (CCS), local authority purchasing consortia or DfE-approved frameworks, where these offer value for money. Using a compliant framework agreement satisfies the competitive tendering requirements and reduces the administrative burden of running a full tender process.

Where a framework agreement is used, the Finance Manager or school business professional must retain a record confirming: the name of the framework; the contracting authority; the framework reference number; and the basis on which value for money was assessed.

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17 Other sources of income include:

- Pupil-related income (trips, enrichment activities, wraparound care).
- Voluntary donations from parents and the community.
- Grants (e.g. Grieg Trust, Tottenham Grammar Foundation)

- Premises lettings and hire of facilities.
- Other trading income and services.

All income, from whatever source, must be recorded in the accounting system promptly and in full. Income must never be used to make payments directly, all receipts must be banked in full and all payments made through the normal payments process.

Where the Trust proposes to enter a transaction with a related party that generates income for the Trust, DfE approval must be sought in advance in accordance with the requirements in this manual.

17.1 Trips, enrichment activities and pupil charges

A lead teacher or member of staff must be appointed for each trip or activity to take responsibility for communicating charges and, where necessary, collecting payments. Charges must be set in accordance with the Trust's Charging and Remissions Policy.

All payments for trips and activities must be made through the Trust's approved cashless payment platform (currently ParentPay or Arbor). Cash payments should be discouraged and accepted only in exceptional circumstances where a family has no access to the cashless system, in which case the procedures in Section **Error! Reference source not found.** apply.

The school business professional must maintain an up-to-date record for each trip or activity showing amounts charged, amounts received and amounts outstanding, and must provide the lead teacher with a regular update so that outstanding amounts can be followed up promptly.

No pupil should be excluded from a trip or activity solely on financial grounds without the matter first being referred to the Headteacher, who may exercise discretion to waive or reduce charges in accordance with the Charging and Remissions Policy.

17.2 Voluntary income and donations

The Trust welcomes voluntary donations from parents and the wider community in support of its schools. The school business professional is responsible for:

- Informing parents and the community about how they can make donations, including via the approved online donation platform.
- Recording all donations in the accounting system promptly.

Administering Gift Aid claims on eligible donations — where a donor is a UK taxpayer and has signed a Gift Aid declaration, the Trust can reclaim basic rate income tax from HMRC, currently adding 25p to every £1 donated. The school business professional is responsible for maintaining valid Gift Aid declarations and submitting claims to HMRC at least annually.

Donations must be made by BACS, standing order, online donation platform or (where no other method is practicable) by cheque made payable to the Trust. Cash donations are discouraged; where received they must be handled in accordance with Section **Error! Reference source not found.**).

All donations, once received, are the property of the Trust and must be accounted for in the Trust's financial statements. They may not be held in separate unofficial accounts.

[…]

20 Links with other policies

- Anti-Fraud and Anti-Corruption Policy (including Gifts and Hospitality) – See Annex I
- Charging and Remissions Policy
- Investment Policy
- Risk Management Strategy
- Scheme of Delegation
- Whistleblowing Policy

[…]

Annex I - Anti-Fraud and Anti-Corruption Policy (including Gifts and Hospitality)

Policy Summary

This policy defines the expected conduct of all staff engaged at the Trust, whether in paid or voluntary employment, in relation to deterring and detecting fraud and corruption, and sets out to whom suspected fraud should be reported. It includes guidelines on what is acceptable in terms of gifts and hospitality and how such matters must be declared. This policy should be read in conjunction with the Trust's Whistleblowing Policy, Internal Financial Procedures, Scheme of Delegation, Staff Professionalism and Code of Conduct Policy, Disciplinary Policy and Equal Opportunities Policy.

1. Introduction

1.1 The Trust is committed to acting with integrity and maintaining the highest standards of probity. Everyone involved with the Trust — staff, governors and directors — has a responsibility to help prevent and detect fraud. The Trust also recognises the important role of others, including pupils' families and contractors, in alerting the Trust to areas where fraud is suspected.

1.2 Recognising a potential fraud and knowing how to report it is just as important as the measures in place to prevent it.

1.3 Providing the public with the highest quality of service requires integrity and honesty at all times, not merely in financial matters but in all dealings on the Trust's behalf.

1.4 It is the duty of all Trust employees, governors and directors to take reasonable steps to limit the possibility of corrupt practices. It is the responsibility of the Responsible Officer (Internal Auditor) to review the adequacy of measures taken by the Trust, test compliance and draw attention to any weaknesses or omissions.

1.5 Any investigation carried out in relation to alleged irregularities will be conducted in accordance with the Trust's Disciplinary Policy. Where covert monitoring of a suspected individual is being considered, legal advice must be obtained before any such action is taken.

2. Definitions

2.1 <u>Fraud</u>: A general term covering theft, deliberate misuse or misappropriation of assets, or anything that leads to a financial advantage to the perpetrator or to others on whose behalf they act. Fraud is intentional deceit and cannot include negligence. It incorporates theft, larceny, embezzlement, fraudulent conversion, false pretences, forgery, corrupt practices and falsification of accounts.

2.2 <u>Corruption</u>: The offering, giving, soliciting or acceptance of an inducement or reward which may influence the actions taken by the Trust, its staff, governors or directors.

2.3 <u>Gifts and Hospitality</u>: Any gifts, rewards or benefits that are disproportionately generous, or that could be seen as an inducement to affect a business decision, must be declared. The acceptance of gifts and hospitality is a sensitive area. Actions that might be acceptable practice in the private sector are frequently not acceptable in public sector employment. Employees' actions should be such that they would not be embarrassed to explain them publicly.

2.4 Irregularities fall within the following broad categories, the first three of which are criminal offences:

- Theft — the dishonest taking of property belonging to another person with the intention of depriving the owner permanently of it.
- Fraud — the intentional distortion of financial statements or other records, carried out to conceal the misappropriation of assets or otherwise for gain.
- Bribery and corruption — the offering or acceptance of a reward for performing an act, or failing to perform an act, which leads to gain for the person offering the inducement (see also section 6 below).
- Failure to observe the Scheme of Delegation or Financial Manual, which in some circumstances can constitute an irregularity with significant financial consequences.

2.5 Examples of what could constitute fraud and corruption include (but are not limited to):

- Theft of cash or non-receipt of income
- Substitution of personal cheques for cash
- Travelling and subsistence claims for non-existent or inflated journeys or events
- Manipulating documentation to increase salaries or wages received, e.g. false overtime claims
- Payment of invoices for goods received by an individual rather than the Trust
- Failure to declare a direct pecuniary or conflicting interest
- Concealing a generous gift or reward
- Unfairly influencing the award of a contract
- Creation of false documents or deception
- Using position for personal reward
- Unauthorised removal or use of Trust equipment

If in any doubt about whether a matter constitutes an irregularity, clarification must be sought from the Finance Manager and/or the Responsible Officer.

3. Policy Statement

3.1 The Trust aims to be an honest and ethical institution opposed to fraud in all its forms. This policy sets out the Trust's approach to eliminating fraud by the way it conducts its business, and its procedures for dealing with the risk of significant fraud or corruption.

3.2 The Trust's objectives are: (i) to create a culture which deters fraudulent activity, encourages its prevention and promotes its detection and reporting; and (ii) to ensure a clear and consistent response to cases of fraud and corrupt practices.

3.3 This policy applies to all Trust employees — permanent, temporary, voluntary and fixed term — as well as to Directors, Local Academy Committee (LAC) members and any person performing services on behalf of the Trust.

3.4 Time limits specified in this document may be extended by mutual agreement. If requested, employees may be accompanied by a recognised trade union representative or a work colleague not involved in any part of the process at any interview held under this policy.

4. Equal Opportunities

4.1 The Trust is committed to equality of opportunity and to promoting an ethos of dignity, courtesy and respect throughout the organisation. This policy will be applied consistently regardless of any protected characteristic.

5. Objectives

5.1 The Trust has taken the following steps to communicate its expectations to staff:

- Development and publication of a formal statement of expected standards of personal conduct, propriety and accountability.
- Development and publication of a formal statement of the procedures to be followed by employees who have a suspicion of, or concern about, possible or actual malpractice within the Trust.

Regular communication and training to ensure all staff are aware of this policy and their responsibilities under it.

6. Gifts and Hospitality

6.1 The guiding principle for all staff is that no gift, reward or benefit should be accepted where it could be seen — or later alleged — to have influenced a business decision.

6.2 Staff must not accept any gift, reward or hospitality (or have it given to members of their families) from any organisation or individual with whom they have contact in the course of their work, where doing so would place them, or could reasonably be seen to place them, in a position of obligation or conflict.

6.3 Each Trust school has a designated officer — the Company Secretary — who is responsible for maintaining a register of gifts and hospitality received where the value is in excess of £25. Members of staff in receipt of such gifts or hospitality must notify the Company Secretary promptly.

6.4 When it is not easy to decide whether a gift or offer of hospitality is acceptable, it must be declined or advice sought from the Company Secretary before accepting.

6.5 Gifts of a trivial nature — for example, a pen, diary or box of chocolates of modest value — are generally acceptable provided they are declared. Gifts of cash are never acceptable in any amount.

6.6 Working lunches or attendance at events as part of a genuine business relationship are generally acceptable, provided they are proportionate and declared. Attendance at sporting events, concerts or similar entertainment paid for by a supplier or contractor requires prior approval from the Company Secretary.

6.7 Members of the Board of Directors, Local Academy Committees, and all Trust staff involved in procurement must disclose in the Trust's register of interests, maintained by the Company Secretary, any business interests they hold in companies or individuals from which the Trust may purchase goods or services. These disclosures must be kept up to date and must include business interests of close relatives where influence could be exerted.

7. Reporting a Suspected Fraud

7.1 Any member of staff who suspects fraud, corruption or other irregularity must report their concerns without delay. The normal route is to the Company Secretary. If the suspected fraud involves the Company Secretary, the matter must be reported directly to the CEO. If it involves either the Company Secretary or the CEO, the matter must be reported directly to the Chair of the Audit Committee.

7.2 No member of staff will suffer any detriment as a result of making a report in good faith under this policy. The Trust's Whistleblowing Policy provides further protection and is available from the Company Secretary.

7.3 All suspected or actual frauds must be recorded in the losses register and reported to the next Audit Committee meeting.

8. Investigations

8.1 All investigations into suspected fraud will be led by the Responsible Officer (internal audit), in accordance with the Fraud Response Plan set out in Annex B.

8.2 Investigations will be conducted in accordance with the Trust's Disciplinary Policy and, where a criminal offence may have been committed, in a manner that preserves the integrity of evidence for potential prosecution. The Responsible Officer must ensure that staff involved in investigations are familiar with the rules on admissibility of evidence in criminal proceedings.

8.3 Investigations must be conducted in accordance with UK GDPR and the Data Protection Act 2018. Any processing of personal data in the course of an investigation must be lawful, proportionate and documented. Where covert monitoring is being considered, legal advice must be obtained before any such action is taken.

8.4 The Responsible Officer will prepare a written report for the Audit Committee on completion of any investigation, including the value of any loss, the persons involved, the means used, measures to prevent recurrence and any action needed to strengthen future responses.

9. Sanctions and Prosecution

9.1 The Trust will pursue disciplinary action — up to and including dismissal — against any member of staff found to have committed fraud or corruption. The Trust will normally also pursue criminal prosecution of such individuals.

9.2 Repayment of all losses will be sought in every case. Where losses are substantial, legal advice will be obtained about freezing assets and civil recovery proceedings.

10. References

10.1 Any request for a reference for a member of staff who has been disciplined or prosecuted for fraud must be referred to the Company Secretary. The Company Secretary, in consultation with HR, will prepare any response having regard to current employment law.