## **INTERNAL AUDIT**

## **Key Contacts**

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#### **Internal Audit**

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#### **Internal Audit**

#### 1 What is Internal Audit?

- 1.1 There is a statutory requirement for every local authority to make arrangements for the proper management and control of their financial affairs. Birmingham City Council delegates this responsibility to the Chief Finance Officer. As part of discharging this responsibility the Chief Finance Officer places reliance on the assurance provided by the Internal Auditors Birmingham Audit.
- 1.2 Birmingham Audit undertakes work within all Council Directorates. It sits within the Council Management Directorate and provides an independent viewpoint. Areas of work covered include:
  - Objectively examining, evaluating, and reporting on the adequacy of financial and non-financial internal controls
  - Providing assurances on the quality of the internal control environment
  - Assessing for value for money
  - Assessing the quality of both financial and operational decision-making
  - Reviewing the robustness of risk management
  - Undertaking fraud investigations
  - Assessing for compliance with laws, regulations, and good practice
- 1.3 In relation to schools, the aim of Birmingham Audit is to provide:
  - Assurance to the Chief Financial Officer (CFO) of the local authority (Director of Council Management), the Director of Children and Families and individual schools Governing Bodies/Senior Management.
  - An added value service to help schools deliver their services in an efficient, economic, and accountable way.

#### 2 The Audit of Schools

#### 2.1 Why do we audit schools?

- 2.1.1 The requirement to audit locally managed schools was originally established in the Department of Education and Science Circular 7/88, issued in 1988, stating that the accounts of schools with delegated budgets will be subject to regular internal audit.
- 2.1.2 Current requirements are documented within the Birmingham Fair Funding Scheme for Financing Schools. This state:

'A continuous internal audit, under the independent control and direction of the Director of Finance, shall undertake to investigate the accounting, financial and

other operations in all departments of the Authority, <u>including schools</u>. <u>All schools covered by this scheme are required to co-operate with the internal audit arrangements.'</u>

- 2.1.3 Local authorities have continuing responsibility for financial regularity in the schools they maintain. The Chief Financial Officer (CFO) of the local authority (Director of Council Management) is responsible for making the necessary arrangements for local financial and management controls, under section 151 of the Local Government Act 1972.
- 2.1.4 The CFO is required to submit a signed assurance statement to the Department for Education each year confirming that they have in place a system of audit for schools that gives them adequate assurance over their standards of financial management and the regularity and propriety of their spending.
- 2.1.5 The statement also provides a breakdown of the numbers and types of schools within the local authority that have submitted the School Financial Value Standard providing the schools assurance on its financial health and resource management.

#### 2.2 The approach to auditing schools

- 2.2.1 Schools function in a constantly changing environment, with increasing independence, and significantly increased financial and performance scrutiny. The relationship between schools and the Local Authority also continues to change. In line with this, the approach to auditing schools is constantly under review.
- 2.2.2 Our overarching aim is to assist Governors, Head Teachers and the Local Authority in establishing and maintaining effective systems of financial administration, and best practice from all aspects of service delivery. Birmingham Audit assesses the risks within schools and adapts our approach accordingly. This has resulted in audit coverage that includes:
  - A rolling programme of individual visits that are selected through a riskbased schools audit plan.
  - Conducting individual school audits as requested by the Local Authority and tailoring our scope and coverage where necessary.
  - Undertaking themed audits across a sample of schools; this will periodically include income management.
  - Delivering added value work to help improve service delivery.
  - Undertaking ad hoc work within schools when this is requested. (This normally incurs a charge).
  - Providing training and guidance.

- 2.2.3 In delivering this coverage we place a greater reliance on management assurance from Governors and Senior Management. However, through testing and verification work, risk assessment, and discussion with key officers we are able to support the Children and Families Directorate in reviewing the arrangements in place within schools, and giving an overall assurance that:
  - Overall management arrangements are effective and efficient;
  - Financial systems are adequate and provide accurate budget information;
  - · Legal requirements are being met;
  - The requirements of the Birmingham Fair Funding Scheme, and the Schools Financial Procedures Manual, are being met.

#### 2.3 What is looked at during an audit?

- 2.3.1 We review the coverage on a regular basis and the contents of the work programme changes to meet changing priorities.
- 2.3.2 When undertaking work in schools we look at:
  - The adequacy of the school's stewardship of Public Funds;
  - The arrangements put in place for financial and operational control;
  - The decision-making processes;
  - Corporate Governance and the role of the Governing Board;
  - Standards of financial management and the regularity and propriety of spending.
  - The processes in place for delivering value for money:
  - Risk management;
  - Compliance with elements in relation to site security and internet monitoring.
- 2.3.3 We assess how schools' function, comply with laid down rules and deliver best practice. The majority of the controls reviewed are based on legal and/or Directorate requirements - they are not Birmingham Audit controls.

#### 2.4 Types of Audit

#### 2.4.1 Risk Based Individual Visits

- 2.4.1.1 Schools are selected for a routine audit on a risk basis see 2.5 for more information.
- 2.4.1.2 An individual audit visit is comprehensive, usually taking three days on site or a combination of remote and onsite visits; remote audits were introduced in response to challenges caused by covid-19 pandemic. The approach is

agreed with the Head Teacher based on each school's individual circumstance prior to the visit. Our work programme has changed and evolved over the last few years to respond to changing challenges and has become more financial focused. We review and test how the school performs in a number of key areas including:

- The Governing Board and Senior Leadership have confidence in the way the school is led and managed.
- Governance oversight of the school's finances making sure that money is well spent.
- Key policies and procedures linked to the school finances are in place.
- Effective strategic financial planning in place that secures the future financial viability of the school.
- There is effective budget monitoring and management.
- Effective systems and controls in place for purchasing and compliance with the SFPM.
- Compliance with the school's own delegation framework and the SFPM.
- There are effective systems and controls in place for purchase cards and compliance with the SFPM.
- Effective systems and controls in relation to site securing and internet monitoring.
- 2.4.1.3 A generic list of expected controls to be reviewed during a visit is issued to the Head Teacher when the notification of visit is issued so they are aware of the areas to be covered. A copy of the list of expected controls is attached at **Appendix A** for reference and can be used for self-assessment.
- 2.4.1.4 A confidential pre-audit questionnaire is issued to all members of the Governing Board and Senior Leadership Team and we request that is returned five days before the audit is due to start.

#### 2.4.2 Themed Audits

2.4.2.1This work concentrates on a particular theme and usually involves visiting ten or more schools. This gives us a broader view of the control environment, and a wider overall assurance and actions for the individual schools selected. Outcomes are summarised and issued to all schools via the termly Auditor newsletter. We recommend that all schools should assess themselves against our findings.

#### 2.4.3 Unannounced Cash Counts

2.4.3.1This work involves turning up at a school unannounced and comparing cash income records to cash held by the school at that moment in time. We may, on occasion, undertake a series of unannounced cash counts.

#### 2.4.4 Follow Up Reviews

- 2.4.4.1All schools receiving a routine visit will also receive a follow up review. This happens in one of two ways:
  - Where a school has received a level 3/4 assurance high risk rating following an audit, they will be subject to an intensive follow up review process consisting of up to 3 reviews at 3 months intervals after the final audit is issued; the first review often undertaken in a Microsoft Team's meeting is based on management assurance on progress made with implementing agreed recommendations. The second/third review usually visits includes a verification of the implementation of all recommendations.
  - All other schools will be captured in the City-Wide follow up process where schools will be asked to provide management assurance that agreed recommendations have been implemented as agreed. A sample of the school returns will be selected for formal verification remotely or via an onsite school visit.

#### 2.4.5 Ad hoc Visits

- 2.4.5.1We undertake visits to schools for a number of other reasons, including:
  - Requests from members or officers within the Children and Families Directorate.
  - Requests for on-site assistance to deal with specific issues.
  - Requests for presentations and training sessions for Governors and/or staff
  - Reguests from Governors/Head Teachers for an audit.

Subject to resource constraints, we try to accommodate all requests, and in many cases, we are able to undertake the visits at no cost to the school. We may have to charge for work carried out, but the school will be informed in advance if this is the case.

#### 2.4.6 Fraud Investigations

2.4.6.1Birmingham Audit has a specially trained Corporate Fraud Team who will visit schools where this is required for the purposes of undertaking special investigations. These visits can be the result of findings from a routine audit, from whistle blowing activities or at the request of members or Directorate officers. Key contacts for this team and important advice can be found in the Fraud Awareness Chapter of the SFPM.

#### 2.5 How schools are selected for inclusion in audit work

- 2.5.1 With regard to routine school visits, schools are selected using a risk-based methodology and will be visited on a high-risk priority order. Each term, we select the visits to be undertaken for the term this is provided to the Children and Families directorate who can comment and suggest changes (and provide the reasoning for any proposed alterations).
- 2.5.2 In respect of themed audits, schools are selected on a random basis. The themed visits allow us to increase our presence in schools during a financial year, therefore wherever possible schools that have received a routine visit are not selected for themed audits. Ideally no school should be involved in more than one themed audit during each financial year, but this cannot be guaranteed.

#### 2.6 **Key milestones in an audit**

- 2.6.1 The progress of an audit can be measured by a number of key milestones which range from the initial contact for a visit through to the issue of correspondence following completion of the work. The milestones to be aware of are detailed below:
  - Letter sent to school detailing dates of proposed audit, (normally a
    week commencing date is given), list of expected controls and the key
    documents required during the visit. This is accompanied by a confidential
    Governor/SLT questionnaires. (We give as much notice of a proposed visit
    as we are able to). For themed audits the school will receive a
    telephone call informing them that the school has been selected.
  - Nearer the date of the audit, the auditor contacts the school by telephone to arrange a convenient day and time to start the visit, establish the split of onsite and remote working and agree times for key interviews.
  - Auditor undertakes the audit as agreed.
  - At the end of the audit an exit meeting is held with an officer designated by the school to discuss our findings.
  - A Draft report is issued to the Head Teacher.
  - A Final report issued to the Chair of Governors and Head Teacher.

• If the Governors feel it would be beneficial, **Birmingham Audit will attend** a Governing Board meeting to present the outcomes of the audit visit.

#### 3. The Reporting Process

- 3.1 At the end of an individual audit, the Head Teacher or other designated officer will receive detailed feedback, giving an indication of the outcome of our work. Should the content of the feedback change significantly following the internal review of the auditor's work, the Head Teacher will be informed in advance of the audit report being issued.
- 3.2 For an individual audit the Head Teacher is issued with the draft audit report. This gives the Head Teacher the opportunity to formally review our findings and comment on the conclusion and recommendations, to discuss any issues with the auditor, and for corrections/amendments to be made (if required). The Head Teacher is asked to provide a response with the name, and position, of the officer responsible for implementing each recommendation, and the date by which this will be achieved. This should be completed within 15 working days. If there is an Interim Executive Board in place, then a copy will be provided to the Chair of the Board. For themed audits, the Head Teacher will be issued with a memorandum detailing the findings, except where outcomes highlight serious issues when a formal report will be issued.
- 3.3 Following agreement on the contents of the draft report, a final report is issued directly to the Chair of Governors. The report provides detailed findings and recommendations, along with the comments, responsible officer nominations and implementation dates provided by the Head Teacher. The Chair of Governors is asked to present the report to the next Governing Board meeting for acceptance, and to provide us with confirmation this has been done. We ask that the report is a standing agenda item for the Governing Board until all our recommendations are implemented. A copy of the report is also issued to relevant Directorate officers. For themed work, a response to the audit memorandum may be sought, but a final version of the document is not issued.

#### 3.4 The Audit Report

- 3.4.1 The audit report has two sections an Executive Summary and an Action Plan.
- 3.4.2 The Executive Summary summarises the findings and is usually no longer than one page. It includes:
  - An Assurance Opinion on the control environment within the school
  - Risk Rating for the Directorate and school
  - An overall opinion on outcome of the work
  - Key issues supporting the opinion
  - Recognition of good practice where applicable

- 3.4.3 The Action Plan details the areas where recommendations have been made. It includes:
  - Details of the control objectives reviewed
  - Findings
  - Recommendations
  - Client comments including officers responsible for implementing recommendations and date of implementation

#### 4. Advice & Guidance

- 4.1 As well as undertaking the programme of school audit work and responding to requests for training and presentations, Birmingham Audit officers are also available to offer advice and guidance, or just to talk things through.
- 4.2 To complement the advice and guidance we provide we continually look to enhance our communication with schools. One method currently used is our termly newsletter for schools 'The *Auditor*'. This provides guidance, raises awareness, highlights best practice, and details how we work, and who schools may see when audit visit. This is located on the City Councils website and notifications on the schools notice board.
- 4.3 If schools have any suggestions on how we can further develop communications, or ideas for items to be included in 'The *Auditor*', please let us know
- 4.4 We are always happy to help and provide a friendly and confidential service. You can get in touch with us in the following ways:

• By e-mail: don.price@birmingham.gov.uk

• By telephone: 07517 539015

• By letter: Audit Services Team, Birmingham Audit,

PO Box 16587 Birmingham B2 2HW

#### 5. Additional Services

- 5.1 In recent years we have seen an increase in consultancy work provided to both maintained and Academy schools. We are constantly reviewing our service and with our flexible approach we can tailor our consultancy work to meet individual needs.
- 5.2 Examples of consultancy work delivered include:
  - Detailed reviews of key areas (e.g. governance, budgetary control & school development planning, purchasing, petty cash and best value).
  - Risk Management workshops

- Financial Training for Governors
- Ad hoc training as required
- 5.3 The cost of consultancy work is based on standard charge out rates per officer grade. Please contact us if you wish to discuss any potential consultancy work.

#### 5. Performance Standards

- 6.1 All Birmingham Audit staff work to very high standards and individual performance is constantly reviewed. Birmingham Audit as an entity has ISO accreditation
- 6.2 All work in schools will be conducted in accordance with best practice and as a minimum you can expect our staff to:
  - have no direct connection/personal interests with the schools they audit
  - be independent and objective in their approach
  - be suitably experienced/qualified
  - foster constructive working relationships with school personnel
  - listen to your viewpoints and consider these within their work
  - exercise due care in fulfilling their responsibilities
  - plan, control, deliver and record the audit work to professional standards
  - effectively evaluate internal control systems within schools
  - base findings, conclusions, and recommendations on sufficient and relevant evidence
  - produce high quality, clear and concise reports in a prompt manner

### Appendix A

### **List of Expected Controls**

Section 1: The Governing Board and senior leadership have confidence in the way the school is run.

NO	Expected Control	Reason for Control
1.01	Sufficient survey responses have been received from the GB and Senior Leadership.  Assurance obtained from survey responses and meetings with Head Teacher, Chair of Governors and Chair of	Supporting the Audit Review
1.02	Finance.  The GB and Senior Leadership have confidence in their ability to manage the school and its finances.  Assurance obtained from survey responses and meetings with Head Teacher, Chair of Governors and Chair of Finance.	financial governance arrangements and strong leadership in place can lead to non-compliance with law and regulation, ineffective

Section 2: There is effective Governance oversight of the school's finances making sure that money is well spent.

NO	Expected Control	Reason for Control
2.01	The Terms of Reference (TOR) for those committees where the Full GB have delegated financial responsibilities include the required elements and are reviewed and approved on an annual basis. The Committee(s) meet in line with its TOR(s) and report back to the Full GB.  Templates available on the Schools	Legal Requirement: School Governance: (Regs, Procedures and Allowances) (England Regulations 2013).  Directorate Requirement: Schools Financial Procedures Manual
	Financial Procedures Manual Financial Delegation Framework Chapter  Where there are no committees in place a financial framework including roles and responsibilities for the GB.	SFVS

2.02	<ul> <li>A delegation statement for the Head Teacher and/or any other nominated representative should be approved by the GB on an annual basis. This should include:         <ul> <li>Financial limits for virement, budget revisions and expenditure decisions.</li> <li>How and what the Head Teacher should report back to the GB.</li> </ul> </li> <li>Templates available on the Schools Financial Procedures Manual Financial Delegation Framework Chapter</li> </ul>	School Governance: (Regs, Procedures and Allowances) (England Regulations 2013)  Directorate Requirement: Schools Financial Procedures Manual
2.03	GB and Committee meetings are quorate.	Governance Handbook
2.04	The GB or finance committee is provided with financial reports on at least a termly basis and is a specified item of business at their meetings.  The minutes of their meetings provide evidence that Governors have used the reports to scrutinise the school's current, future financial position and respond to issues arising from a projected surplus, in year and or cumulative deficit.  The full GB is receiving a full summary of the financial position along with the LA financial reports templates, Appendix 2 and Appendix 3 inline with the Finance and Governance Chapter, SFPM.	DFE guidance. Governance Handbook. Schools Financial Procedures Manual. Directorate Requirement. SFVS.
2.05	Head Teacher and Governors are sufficiently trained with regard to finances.	DFE guidance Governance Handbook October 2020 Directorate Requirement SFVS
2.06	The GB have been provided with and have reviewed the top 10 planning check list for Governors by end Autumn Term and by end Spring Term. Appendix 1 Schools Financial Governance Chapter, SFPM.	Directorate Requirement SFVS

2.07	The SFVS return has been fully completed for the previous financial year and this has been submitted to the LA by 31st March.  The dashboard has been completed and the outcomes have been discussed at the Governing Board and subsequent actions agreed.  The document has been approved by the Full GB and recorded in the minutes of the relevant meeting, prior to submission to the LA.	DFE guidance Governance Handbook October 2020.  N.B the latest version can obtained via; Schools financial value standard (SFVS) - GOV.UK Further guidance in; Schools Financial Procedures
2.08	The Governing Board have completed an Annual Statement of Internal Control (SIC) to assess the adequacy of the internal control environment in place. The minutes maintained for GB or committee meetings clearly indicate the evidence used by Governors to enable them to certify the SIC.	Schools Financial Procedures Manual Guidance provided in; Schools Financial Procedures
2.09	The GB has established a register of business and personal interests for Governors which is updated on an annual basis. Annual declaration of pecuniary interest forms are completed in full, including writing 'None' where there is no interest to declare. Documents are retained in line with the corporate retention policy which is 7 years after the person ceases to be a governor.	DFE statutory guidance – The constitution of governing bodies of maintained schools August 2015 Template form is located, in the Delegation Framework Chapter of the Schools financial Procedures Manual SFVS
2.10	The school has published on their website relevant business interests and pecuniary interests for the GB (as recorded in the register of interests) including;  • Governor roles in other education institutions.  Any material interest arising from relationships between governors or relationships between Governors and school staff.	Statutory Guidance – The constitution of governing bodies and maintained schools August 2015 Governance Handbook October 2020. SFVS Link to template; Pecuniary Interest Register
2.11	All staff should complete an annual declaration of business interest. The records should be retained for the same amount of time as a personnel file which is	Schools Financial Procedures Manual

	termination of employment + 7 years (with a longer retention if there is an allegation of a child protection nature against an employee).	
2.12	The school has a formal process for identifying, assessing, and managing financial and non-financial risks.	Governance Handbook

# Section 3: Key policies and procedures linked to the school finances are in place.

NO	Expected Control	Reason for Control
3.01	There is a regular review of the charging and remissions policy and lettings policy documents that meet legal requirements and reflect practice in the school.	Legal Requirement: School Governance: (Regs, Procedures and Allowances) (England Regulations 2013) Statutory Policies for Schools
3.03	The school has a gifts and hospitality policy along with supporting gift and hospitality register, which is presented to Governors on a termly basis, including nil returns.	Schools Financial Procedures Manual
3.04	The school and GB have adopted the Whistleblowing & Serious Misconduct Policy). A copy of the policy has been made available to all staff and Governors and they are aware of what actions to take should they wish to raise any major concerns.	LA requirement Governance Handbook October 2020 Schools Financial Value Standard Schools Financial Procedures Manual SFVS

Section 4: There is effective strategic financial planning in place that secures the future financial viability of the school.

NO	Expected Control	Reason for Control
4.01	The school has developed a 3-year financial plan.	Governance Handbook October 2020 Schools Financial Procedures Manual Directorate Requirement SFVS

4.02	The 3-year financial plan provides realistic predictions for the school development plan.	Governance Handbook October 2020 Schools Financial Procedures Manual Directorate Requirement SFVS
4.03	The Local Authority School's Financial Services Team has been informed of any predicted deficits.	Governance Handbook October 2020 Schools Financial Procedures Manual Directorate Requirement
4.04	The school has sought support from the Local Authority in addressing a predicted deficit.	Governance Handbook October 2020 Schools Financial Procedures Manual Directorate Requirement SFVS
4.05	There are appropriate action plans in place to mitigate against the risk of budget deficit. There is real hard evidence that saving plans will achieve the proposed savings.	Directorate Requirement
4.06	Where savings plans have included staffing restructures these have been managed appropriately including; a sound business case, approval from the LA, approval by the Governing Board and the school can evidence that this will achieve the required savings.	Directorate Requirement

### Section 5: There is effective budget planning monitoring and management.

NO	Expected Control	Reason for Control
5.01	Budget planning should start in advance of the financial year. This will allow timely approval by the GB or its delegated Committee prior to allocating any funds on the school's financial management system.	Schools Financial Procedures Manual SFVS
5.02	The Budget Plan should be prepared in line with the available funds. A balanced budget should be set however if this is not possible an in-year deficit budget must be agreed with Schools Financial Services BCC.	Directorate Requirement: Schools Financial Procedures Manual

5.03	The use of carry forward surpluses in order	Schools Financial
	to set a balanced budget is only done as a short-term measure as continuing to do this creates a risk of deficit in future years.	Procedures Manual
5.04	Carried forward balances should be properly managed. This includes:  • Formal repayment plans for deficit balances (debt over 5%)  • Documenting and approving the planned use of surplus balances including the completion of the carry forward analysis document.	Directorate Requirement: Schools Financial Procedures Manual SFVS DFE
5.05	The budget allocations entered onto the school's financial management system should be those approved by the GB in the Budget Plan. The budget should be fixed onto the system as soon as possible after approval.	Schools Financial Procedures Manual
5.06	The suspense account should be cleared on at least a monthly basis, including the reconciliation of items to an appropriate cost centre.	Schools Financial Procedures Manual
5.07	Documentation is available to support the current financial position.	Schools Financial Procedures Manual
5.08	LA maintained schools to publish annually on their websites the number of individuals (if any) earning over £100K in £10K	DfE requirement – Financial Transparency from Jan 2021
5.09	LA maintained schools to publish links to the benchmarking website	DfE requirement – Financial Transparency from Jan 2021
5.10	The school is able to provide financial year balance on their unofficial fund(s).	Directorate Request
5.11	Where school meals are sold to staff VAT is accounted for appropriately.  N.B. The rate of VAT chargeable on the sales of meals to adults, has been reduced to 5% from 15 July 20 to 31 March 2021. After this time, it will revert to 20%.	Directorate Request

Section 6: There are effective systems and controls in place for purchasing (not including purchase cards) and compliance with SFPM.

NO	Expected Control	Reason for Control
6.01	Official orders should be raised and approved on the school's financial management system in advance of making purchases. Only in exceptional circumstances should verbal orders be used. In such circumstances, official orders should be raised and authorised within 24 hours of the order being made.	School Financial Procedures SFVS
6.02	Two people should be involved in the ordering process, as follows: One person to raise the order by entering it onto the schools financial management system, a different senior member of staff to authorise the order on the school's financial management system and to certify the paper copy.	School Financial Procedures SFVS
6.03	The receipt of goods and services should be checked before invoices are processed for payment. This should be completed by someone not involved in processing invoices, who should sign and date the supporting papers.	School Financial Procedures SFVS
6.04	The school's contracts are managed effectively to ensure value for money is obtained.	Good Practice SFVS

Section 7: There is Compliance with the school's own delegation framework and SFPM.

NO	Expected Control	Reason for Control
7.01	All expenditure above the limits contained within school's financial procedures should be subject to 3 written quotations. A formal tendering process should be followed for items above the limits contained within the schools financial procedures manual. These will include where collaborative purchases have taken place between schools to achieve best value.	Schools Financial Procedures Manual

7.02	Prior approval has been sought from Governors for all expenditure above the limits identified within the Head Teacher's and/or any other nominated officer's delegation statement.	Schools Financial Procedures Manual
7.03	Ongoing monitoring of cumulative expenditure with individual suppliers should take place with reporting to the governing board on a termly basis for the current year. An annual report should be produced and reviewed that provides detail over three/five previous financial years or life of the contract to ensure it does not exceed financial limits.  When expenditure accumulates to or is more than £10,000 (this may cross several financial years then three written quotations should be obtained. A tender process will be required if such expenditure exceeds the procurement thresholds.	Schools Financial Procedures Manual
7.04	All expenditure linked to individuals connected with the school has been appropriately authorised and procured;  • Private individuals, related party transactions and supporting schools (including consultants- HMRC IR35 Regulations)  • Staff  • Governors  • Pecuniary interests	Schools Financial Procedures Manual HMRC IR35 Regulations SFVS

# Section 8: There are effective systems and controls in place Purchase Card Compliance and compliance with the school's financial procedures manual.

NO	Expected Control	Reason for Control
8.01	Prior to having a purchase card(S) the school have obtained approval from the Governing Board and this is clearly recorded in the minutes of the meeting.	Schools Financial Procedures Manual

8.02	The school has its own purchase card policy that has been approved by the Governing Board.	Schools Financial Procedures Manual
8.03	The purchase card number and types can be confirmed. All active cards are with current members of staff.	Schools Financial Procedures Manual
8.04	Transaction Logs are completed in full on a monthly basis.	Schools Financial Procedures Manual
8.05	Expenditure on the purchase cards is appropriate.	Schools Financial Procedures Manual
8.06	Card holders view the DCAL weekly and assign the VAT appropriately.	Schools Financial Procedures Manual

# Section 9: There are effective systems and controls in place to ensure Site and IT Security

NO	Expected Control	Reason for Control
9.01	A process is in place to ensure that there is strict control over visitor access to all school sites including; All visitors are provided with the required information regarding safeguarding.	KCSIE – Good practice
9.02	The school has monitoring mechanisms logs to verify that the usage of the internet is appropriate. Procedures are in place to ensure that periodic reviews are undertaken and evidence of these checks taking place is retained and that individuals are aware of what action should be taken.	KCSIE 2021