



Accounting, Finance and Resources Policy

**Responsible for policy
Chair of Directors**

CC1 Finance, Resources and Premises

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Definitions

In this Accounting, Finance and Resources Policy, unless the context otherwise requires, the following expressions shall have the following meanings:

- I. **'The Romero Catholic Academy'** ("Romero") means the Company named at the beginning of this **Accounting, Finance and Resources Policy** and includes all sites upon which the Company is undertaking, from time to time, being carried out. The Romero Catholic Academy includes; **Corpus Christi, Good Shepherd, Sacred Heart, SS Peter and Paul, St Gregory, St John Fisher, St Patrick, Cardinal Wiseman and the Shared Services Team.**
- II. **'Romero Catholic Academy'** means the Company responsible for the management of the Academy and, for all purposes, means the employer of staff at the Company.
- III. **'Board'** means the board of Directors of the Romero Catholic Academy.
- IV. **'Chair'** means the Chair of the Board or the Chair of the Local Governing Body of the Academy appointed from time to time, as appropriate.
- V. **'Governance Professional'** means the Governance Professional to the Board or the Governance Professional to the Local Governing Body of the Academy appointed from time to time, as appropriate.
- VI. **'Chief Executive Officer (CEO)'** means the person responsible for performance of all Academies and Staff within the Multi Academy Company and is accountable to the Board of Directors.
- VII. **'Chief Financial Officer (CFO)'** – means the person who is the trust's finance director, business manager or equivalent, to whom responsibility for the trust's detailed financial procedures is delegated. The CFO should play both a technical and leadership role. (AFH)
- VIII. **'Diocesan Schools Commission'** means the education service provided by the diocese, which may also be known, or referred to, as the Birmingham Diocesan Education Service.
- IX. **'Local Governing Body'** means the governing body of the School.
- X. **'Governing Body Representatives'** means the governors appointed and elected to the Local Governing Body of the School, from time to time.
- XI. **'Principal'** means the substantive Principal, who is the person with overall responsibility for the day to day management of the school.
- XII. **'School'** means the school within The Romero Catholic Academy and includes all sites upon which the school undertaking is, from time to time, being carried out.
- XIII. **'Shared Services Team'** means the staff who work in the central team across the Company (e.g. HR/ Finance)
- XIV. **'Vice-Chair'** means the Vice-Chair of the Board or the Vice-Chair of the Local Governing Body of the Academy appointed from time to time, as appropriate.
- XV. **'Academies Trust Handbook'** – means the document produced by the ESFA and updated annually which provides an overarching framework for implementation of effective financial management and control and which Academy Trusts must comply with as a condition of their funding agreement
- XVI. **'School Business Manager (SBM)'** – means the School Business Manager
- XVII. **'Office Manager (OM)'** – means the School Office Manager

1. Introduction

Academy status brings increased autonomy through the Funding Agreement with the Secretary of State for Education (SofS). Autonomy brings responsibility and the need for transparency. Operating as a charitable company limited by guarantee demands the production of commercial style annual accounts and the protection of public and donated funds and requires policies and procedures to achieve this. Though independent, Romero contributes to the Whole of Government Accounts through the Department for Education (DfE).

The purpose of this policy and the associated procedures is to ensure that Romero maintains and develops systems of financial control which conform to the requirements of propriety, regularity and of sound financial management. It is essential that these systems operate effectively to meet the requirements of Romero's Master Funding Agreement with the SofS.

Romero must comply with the principles of financial control outlined in the guidance published by the DfE, including the comprehensive Academy Trust Handbook which is updated annually by the DfE. This policy expands on that and provides detailed information on Romero's accounting procedures. It should be read by all staff involved with financial and resource systems to ensure accountability.

2. Organisation

Romero has defined the responsibilities of each person involved in the administration of its finances to avoid the duplication or omission of functions and to provide a framework of accountability for Directors and staff. All persons with delegated authority are expected to act in the best interests of Romero and within the letter and spirit of the law. To support the effective and efficient administration of resources, training will be identified through Romero's performance management system.

2.1 The Board of Directors

The Directors will manage their affairs in accordance with the high standards detailed in the Seven Principles of Public Life:

- **Selflessness** - Holders of public office should act solely in terms of the public interest.
- **Integrity** - Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships
- **Objectivity** - Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.
- **Accountability** - Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.
- **Openness** - Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.
- **Honesty** - Holders of public office should be truthful.
- **Leadership** - Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

As Directors of a company that spends Government money, the Directors will adhere to Government guidance re the Code of Conduct for Board Members of Public Bodies

2.2 Managing Romero's Finances

The Directors have overall responsibility for administration of Romero's finances. The main financial and resource management responsibilities of the Board of Directors are:

- Oversee and ensure effective financial performance.
- Take ownership of financial sustainability and ability to operate as a going concern.
- Take full responsibility for financial affairs, stewardship of assets and ensure efficient use of resources to maximise outcomes for pupils.
- Meet regularly to discharge responsibilities and ensure robust governance and effective financial management. Board meetings must take place at least three times a year (and business conducted only when quorate), although they should consider meeting more frequently.
- Approve a written scheme of delegation of financial powers that maintains robust internal controls.
- Appoint in writing a Chief Executive Officer (CEO).
- Appoint in writing a named individual as Accounting Officer (this should be the Chief Executive Officer)
- Appoint a Chief Financial Officer (CFO).
- Appoint a financial, audit and risk committee to which the board delegates financial scrutiny and oversight, sets the programme of independent internal scrutiny and which can support the board in maintaining the trust as a going concern.
- Ensure internal control and risk management is scrutinised (including maintenance of a risk register which is reviewed at least annually) and operating effectively.
- Ensure that financial plans are prepared and monitored, ensuring rigour and scrutiny in budget management.
- Take a longer-term view of the trust's financial plans consistent with the requirement to submit three-year budget forecasts to DfE.
- Approve a BFR3Y prior to submission to DfE.
- Minute that it has considered Management Accounts submitted to the Board at least 6 times annually.
- Explain its policy for holding reserves in its annual report.
- Ensure investment risk is properly managed.
- Ensure decisions about levels of executive pay follow a robust evidence-based process and are a reasonable and defensible reflection of the individual's role and responsibilities.
- Appoint the External Auditors and notify DfE immediately of the removal or resignation of the auditors.
- Ensure adequate insurance cover is in place.
- Ensure accurate accounting records are maintained.
- Approve and submit the annual accounts of the multi-academy.
- Determine the pay and conditions of staff.
- Approve the Strategic three year and Operational Plan.

2.3 Core Committee 1: Finance, Audit, Resources and Premises Committee (CC1)

The main financial responsibilities of CC1 include:

- Meet at least 3 times per year.
- Direct the programme of internal scrutiny and agree who will perform the work (independence and objectivity).
- Report to the board on the adequacy of the trust's internal control framework, including financial and non-financial controls and management of risks and summary of findings of programme of internal scrutiny.
- Review the ratings and responses on the risk register to inform the programme of work, ensuring checks are modified as appropriate each year.
- Consider outputs from other assurance activities by third parties.
- Ensure information submitted to DfE that affects funding, including census returns and funding claims (for both revenue and capital grants) is accurate and in compliance with funding criteria.
- Initial review and authorisation of the BFR3Y.
- Review the monthly management accounts report and take appropriate action to unexpected variances to budget/forecast.
- Ensuring the annual accounts are produced in accordance with the requirements of the Companies Act 2006, Charity SORP and the DfE guidance issued to academies.
- Initial approval of the Financial Scheme of Delegation and subsequent amendments.
- Recommend changes re personnel.
- Review, monitor and report to CC1 on capital projects which over spent by more than 5% (SCA funding).
- Review the external auditor's plan each year, review the annual report and accounts, review the auditor's findings and actions taken by the CFO in response to those findings, assess the effectiveness and resources of the external auditor.

2.4 The Accounting Officer (AO)

Appointed as Accounting Officer, the CEO has overall executive responsibility for The Romero Catholic Academy and is personally responsible to the Directors, Parliament and the DfE for:

- Ensuring regularity, propriety, value for money and feasibility;
- Ensuring adherence to the [seven principles](#) of public life.
- Ensuring oversight of financial transactions by
 - Ensuring the property and assets are under the directors' control, and measures exist to prevent losses or misuse.
 - Ensuring bank accounts, financial systems and financial records are operated by more than one person.
 - Ensuring full and accurate accounting records are kept to support the annual accounts.
- Taking personal responsibility for assuring the board that there is compliance with the funding agreement and AFH. This responsibility must not be delegated.

The Accounting Officer may formally delegate or appoint others to assist in these responsibilities unless otherwise stated.

The Accounting Officer has a duty to take action if the Directors or Chair is contemplating a course of action, which is considered to be novel, contentious, an infringement of propriety or regularity or a contravention of the [seven principles](#) of public life or the [Codes of Practice](#) for Board Members of Public Bodies. Objections should be put in writing to the Directors, details sent to the Governance Professional to the Directors and the external auditors.

The Principals retain responsibility for:

- Authorising orders and contracts within the approval limits set out in the Financial Scheme of Delegation.
- Monitoring regular budget reports with the CFO acting on any overspends or risks.
- Setting annual budgets and in-year reforecasts with the CFO.

2.5 Chief Financial Officer (CFO)

The appropriately qualified/experienced CFO is appointed by the Board of Directors and reports to the CEO and to whom responsibility for Romero's detailed financial procedures is delegated. The main responsibilities of the CFO are:

- Play both a technical and leadership role.
- Establish a suitably qualified/experienced finance team.
- Day-to-day management of financial issues including the establishment and operation of a suitable accounting system.
- Management of Romero's financial position at a strategic and operational level.
- Maintenance of effective systems of internal control.
- Ensuring that the annual accounts are properly presented and adequately supported by the underlying books and records.
- Preparation of monthly management accounts forecasts and 3-year plan.
- Authorising orders, contracts and payments within the approval limits set out in the Financial Scheme of Delegation.
- Ensuring forms and returns are sent to the DfE in line with their reporting deadlines.

2.7 External Auditor

Romero must report on its finances to give assurance to Parliament and the public about the use of resources. The Board is responsible for appointing the External Auditors under Companies Act 2006 to certify whether the annual accounts present a true and fair view of Romero's financial performance and position.

The audit contract must be in writing. This letter of engagement must only cover the external audit. If additional services are purchased, a separate letter of engagement must be obtained specifying the work and the fee.

The letter of engagement must allow for removal of auditors, before the expiry of the term of office, in exceptional circumstances.

A review of the AO's statement must be included within the remit of the external auditors. The auditor's conclusions on regularity must be addressed jointly to Romero and ESFA.

The audit process can support Romero by identifying areas that may require improvement.

2.8 Other Staff

Other members of staff, primarily Finance Manager, Finance Assistants, School Business Managers, Office Managers across the primary schools, and Budget Holders, will have some specific financial responsibilities.

All Directors, staff and volunteers are responsible for the security of Romero property, for avoiding loss or damage, for ensuring economy and efficiency and avoiding waste and extravagance in the use of resources and for conformity with the requirements of the Academy's financial procedures.

2.9 Register of Interests / Related Party Transactions (RPT)

It is important for anyone involved in spending public money to demonstrate that they do not benefit personally from the decisions they make. Therefore, all members, directors, governing body representatives and senior employees must complete a register of interests to declare any financial interests they have in companies or individuals from whom Romero may purchase goods or services. The register is open to public inspection.

The register of interests must capture relevant business and pecuniary interests of members, trustees, local governors and senior employees, including directorships, partnerships and employments with businesses, trusteeships and governorships at other educational institutions and charities and for each interest: the name and nature of the business, the nature of the interest and the date the interest began.

The register must identify relevant material interests from close family relationships between Romero's members, directors, governing body representatives and senior employees. It must also identify relevant material interests arising from close family relationships between those individuals and employees.

The existence of a register of business interests does not, of course, detract from the duties of Directors and staff to declare interests whenever they are relevant to matters being discussed by the Board of Directors, a Committee or other meeting.

The board must ensure requirements for managing related party transactions are applied across Romero. The board chair and the AO must ensure their capacity to control and influence does not conflict with these requirements. They must manage personal relationships with related parties to avoid both real and perceived conflicts of interest, promoting integrity and openness in accordance with the 7 principles of public life.

Romero must recognise that some relationships with related parties may attract greater public scrutiny, such as:

- transactions with individuals in a position of control and influence, including the board chair and AO
- payments to organisations with a profit motive, as opposed to those in the public or voluntary sectors
- relationships with external auditors beyond their duty to deliver a statutory audit.

Romero must keep sufficient records, and make sufficient disclosures in their annual accounts, to show that transactions with these parties, and all other related parties, have been conducted in accordance with the high standards of accountability and transparency required within the public sector.

Romero must report all contracts and other agreements with related parties to DfE in advance of the contract or agreement commencing. Romero must report all contracts and other agreements with related parties to DfE in advance of the contract or agreement commencing or being renewed. Romero must obtain DfE's prior approval, for contracts and other agreements for the supply of goods or services to Romero by a related party that exceeds £40,000 in the same financial year ending 31 August.

3. Financial Planning

The CFO has responsibility to produce up to 4 sets of budgets/forecasts for each academic year:

1. An initial Budget (July preceding the start of the academic year, published to DfE as part of the BFR 3-year plan);
2. A Term 1 reforecast (internal only – prepared around December);
3. A Term 2 reforecast (internal only – prepared around April);
4. A Term 3 reforecast (internal only – a light touch forecast prepared at the same time as the following years' BFR (3-year plan).

The board of directors and CC1 must ensure rigour and scrutiny in budget management.

- **Budget setting** – The board must ensure that budget forecasts, for the current year and beyond, are compiled accurately, based on realistic assumptions including any provision being made to sustain capital assets, and are reflective of lessons learned from previous years. It should challenge pupil number estimates as these will underpin revenue projections.
- **Budget monitoring** – The CFO must prepare management accounts every month setting out its financial performance and position, comprising budget variance reports and working capital information sufficient to manage cash, debtors and creditors. Directors must take appropriate action to ensure ongoing viability.

Management accounts must also be shared with the chair of the board every month and with the other directors six times a year. The board must consider these when it meets. The board must ensure appropriate action is being taken to maintain financial viability including addressing variances between the budget and actual income and expenditure.

4. Accounting System

All the financial transactions must be recorded onto an accounting system. The CFO has responsibility to ensure an adequate system is used for this purpose.

4.1 Administration

There will be a clear audit trail for all financial transactions from the original documentation to accounting records. Finance records will be stored for 7 years in accordance with the Companies Act. Only authorised staff will be permitted access to the accounting records, which should be securely retained when not in use.

Authorisation and supervisory controls will ensure transactions are properly recorded or that errors are identified. All records will be protected against unauthorised modifications, destruction, disclosure or loss whether by accident or intention.

4.2 Access Rights

The CFO has responsibility for assigning access to the accounting system.

4.3 Back-up Procedures

The finance system will be protected by robust back up procedures; the system should be backed up daily on a cloud storage solution.

4.4 Transaction Processing

- Responsibility for transaction processing will be divided between School Business Managers/Office Managers and the Shared services Finance team.
- School Business Managers/Office Managers will be responsible for processing all purchase orders (within the Financial Scheme of Delegation) on the finance system and scanning goods received documentation against orders.
- Purchase Invoices and payments will be managed by the Finance Managers/Finance Assistants within the Shared Services finance team.

- School Business Managers/Office Managers are responsible for providing the necessary information for all other bank transactions (charge cards, direct debits, banking, direct receipts) to be processed by the Shared Services finance team.
- The Finance team will ensure that bank reconciliations are performed promptly each month and balance sheet reconciliations for debtors, creditors, payroll control accounts, accruals and prepayments are prepared quarterly. The CFO will review these reconciliations to ensure any unusual or long outstanding reconciling items are dealt with appropriately.

5. Payroll and Staff Payments

The main elements of the payroll system are:

- Staff appointments and changes.
- Payroll administration.
- Payroll Processing and payment.
- Transaction recording and reconciliation to budget/forecast.

5.1 Staff Appointments and Changes

All appointments, leaver replacements or changes affecting finance require approval by the Principal, CEO, Chief Financial Officer and Head of HR. HR maintains personnel files for all members of staff, which include contracts of employment.

5.2 Payroll Administration

Payroll is outsourced to Every/Dataplan currently.

All starters, leavers and amendments are notified to Every/Dataplan for processing in the appropriate month by HR. Before Payroll is finalised exception reports are returned to HR for final checking.

5.3 Payroll Processing & Payment

Once HR have checked the payroll reports the payroll is run and final reports sent to HR & Finance. Authorisation is sent back to Every/Dataplan approving the BACS payment run.

5.4 Transaction Recording & Reconciliation

The monthly journal is prepared by finance and posted into the Finance System. As part of the month end procedure the Senior Finance Manager reconciles the monthly payroll to the latest budget/forecast and informs Every/Dataplan/HR of any unexpected variances.

5.5 Staff and Director Travel & Subsistence Claims

All Staff travel and other reimbursement claims are authorised by the CFO or line manager. These are then paid through the finance system (See Separate Travel & Expenses Policy).

6. Purchasing and Payments

Romero will always aim to achieve the best value for money for all purchases in line with the Academy Trust Handbook. A large proportion of our purchases will be paid for with public funds and we need to maintain the integrity of these funds by following the general principles of:

- **Probity**, it must be demonstrable that there is no corruption or private gain involved in the contractual relationships of the Academy.
- **Accountability**, the Academy is publicly accountable for its expenditure and the conduct of its affairs.
- **Fairness**, that all those engaged by the Academy are dealt with on a fair and equitable basis.

The CFO will ensure that there is a clear separation of duties within the finance team, such that no one individual is able to order, process and pay for goods and services.

6.1 Purchase Orders

See Financial Scheme of Delegation for eligibility and financial limits. Orders for schools are raised by the school and approved by the principal. Orders for SST are raised by SST and approved by senior leadership within SST.

6.2 Payments

Invoices are sent by email to the Shared Services finance team before payments can be processed. Invoices will be matched to the appropriate Purchase Order and approved on the finance system by the finance team only where there is an approved order and it has been ascertained that goods or services have been received and are of the quality expected.

In the absence of an approved purchase order, principals/budget holders will approve the invoice on the finance system.

Any discrepancies must be notified and suppliers contacted by the School Business Manager/Office Managers/Finance Assistant.

6.3 Leases

The Academy may enter into operating lease agreements where these provide an affordable option over outright purchase. These are approved in accordance with the Financial Scheme of Delegation.

7. Income (including Cash Handling)

The main sources of income for Romero are the General Annual Grants (GAG) from the ESFA and other outside agencies. The receipt of these sums is monitored by the CFO who is responsible for ensuring that all grants due to Romero are collected.

7.1 Trips/Activities

All trips and activities must be authorised and financially managed by the Principal/Budget Holder/SBM/OM. See Charges and Remissions Policy for further details.

7.2 Lettings

See Separate Letting Policy (tbc).

7.3 Debtors

See Financial Scheme of Delegation.

7.4 Custody

Where possible we promote cashless processes. Where cash is received from parents it is held securely in the school until it can be banked.

7.5 Gifts and Hospitality

See Gifts & Hospitality Policy.

8. Cash Management

8.1 Bank Accounts

Currently Romero operates 11 bank accounts – 8 for the schools, 1 for SST, 1 Catering and 1 for Instant Access Savings. It is not anticipated that there would be a requirement to have any more accounts operational. Since Sep 22 the vast majority of transactions are made through the SST bank account, with the remaining current accounts remaining open for direct debits and adhoc transactions.

8.2 Deposits

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

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

8.3 Payments and withdrawals

Romero is now chequeless and will only make direct electronic bank transfers. It is still able to bank cheques received.

All supplier payments are made via bank transfer requiring of finance managers/CFO/ to process any one payment.

8.4 Bank Reconciliations

All bank accounts must be reconciled before starting the month end process. This task is performed by the Finance team and reviewed by the CFO.

8.5 Petty Cash

Petty cash is maintained by exception and in very small amounts.

8.6 Cash Flow Forecasts

Bank transactions are recorded weekly into a cash flow forecast to provide the CFO with an understanding of the next 3 months' cash flow position. This is reported to CC1/Board on the monthly management report.

Cash held on deposit is managed by the CFO to ensure adequate day to day needs are met whilst maximising high interest receivable.

8.7 Investments

See Investment Policy.

9. Fixed Asset

9.1 Fixed Asset Register

All items purchased with a value over £5,000 (Romero's capitalisation limit) must be entered in the asset register held within the finance system, which will include the following information:

- Asset description.
- Asset number.
- Serial number.
- Date of acquisition.
- Asset cost.
- Expected useful economic life (in years).
- Depreciation.
- Current book value.
- Location.

The Asset Register helps:

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

9.2 Security of Assets

As most computer equipment is leased most of the assets on the fixed asset register relate to SCA expenditure.

Inventories of Academy property will be kept up to date and reviewed regularly.

9.3 Disposals

See Financial Scheme of Delegation.

10. Depreciation

Romero will depreciate fixed assets in line with recognised accounting standards, Academy best practice and DfE guidelines. Depreciation rules and revisions will be approved by the Board of Directors.

Assets costing £5,000 or more are capitalised as tangible fixed assets and are carried at cost, net of depreciation and any provision for impairment.

Where tangible fixed assets have been acquired with the aid of specific grants, either from the government or from the private sector, they are included in the Balance Sheet at cost and depreciated over their expected useful economic life. The related grants are credited to a restricted fixed asset fund in the Statement of Financial Activities and carried forward in the Balance Sheet. Depreciation on such assets is charged to the restricted fixed asset fund in

the Statement of Financial Activities so as to reduce the fund over the useful economic life of the related asset on a basis consistent with the academy trust's depreciation policy.

Depreciation is provided on all tangible fixed assets at rates calculated to write off the cost of each asset on a straight-line basis over its expected useful lives, as follows:

- Fixtures, fittings & motor vehicles (5 years)
- Site Improvement (10 years)

- ICT equipment (3 years)

A review for impairment of a fixed asset is carried out if events or changes in circumstances indicate that the carrying value of any fixed asset may not be recoverable. Shortfalls between the carrying value of fixed assets and their recoverable amounts are recognised as impairments. Impairment losses are recognised in the Statement of Financial Activities.

11. Academy Companies Policy

The Academy will not form any companies, subsidiaries or joint ventures without the approval of the Board of Directors and Trustees.

12. Reserves, Investment and Borrowing Policy

12.1 Reserves

Romero aims to ensure reserves of 6% of GAG are held at any one time.

12.2 Investments

See Investment Policy.

12.3 Borrowing

Romero must manage its cash position robustly. It must avoid becoming overdrawn on any of its bank accounts so that it does not breach restrictions on borrowing.

The CFO reports on 3 month projections in the monthly management accounts and manages day to day cash needs in the schools by transferring cash when needed.

13. VAT Refund Scheme for Academies

Romero is not VAT registered as it does not meet the threshold for VATable supplies. Instead, Romero makes use of the VAT126 scheme which allows a reclaim of input VAT. The CFO submits a claim every month.

14. Keys and Key Code Inventory

The key inventory is the responsibility of the Head of Estates and School Business Managers or the Office Manager to maintain and will be kept up to date at all times. It is the responsibility of the Principals and School Business Managers or the Office Manager within the schools to keep up to date records of keyholders. Staff must report any lost or stolen keys or ID cards, or compromised key codes, to enable new security measures to be put in place and for the key inventory to be updated.

See also Information Security Policy.

15. School Minibuses

16. Data Management

See Information Security Policy & Data Protection Policy

17. Insurance

The Academy purchases adequate insurance to protect assets, activities and outcomes. The insurance policy terms and levels of cover are reviewed annually by the CFO.

18. Counter Fraud, Theft and Corruption Policy

The Academy takes a firm zero tolerance approach to all instances of fraud, theft or corruption. Through its systems, checks and controls, the Academy aims to prevent theft, fraud and corruption, but will act as necessary to identify suspected instances and irregularities and will take appropriate action against those responsible.

19. Links to other Policies

This Accounting Finance and Resources Policy is linked to our:

- Travelling and Expenses Policy
- Gifts and Hospitality Policy
- Investment Policy
- Fixed Asset Policy
- Information Security Policy
- Data Protection Policy
- Minibus Policy
- E Safety Policy

20. Monitoring and Review

The Board of Directors delegate the implementation of this policy to the Local Governing Body.

This policy will be reviewed by CC1 Finance, Audit, Resources and Premises.