BMAT FINANCE POLICY

Approving Body	Trust
Date of Last Review	September 2026
Statutory (Y/N)	Y
Responsible Officer	BMAT CEO for and on behalf of the Trust

INTRODUCTION

- The purpose of the Finance Policy and its associated procedures is to ensure that BMAT maintains and develops systems of financial control which conform to the requirements both of propriety and of good financial management. It is essential that these systems operate effectively to comply with the principles of financial control outlined in the Academy Trust Handbook published by the DfE and its Funding Agreement.
- This policy provides detailed information on BMAT's accounting procedures, which enable Trustees, (Local Governing Bodies) LGBs and members of staff with financial responsibilities to apply the principles of best value to all BMAT financial dealings, resulting in the most effective, economic and efficient use of resources.
- This policy should, along with the Academy Trust Handbook, be read by all staff involved with financial systems.

DELEGATED FINANCIAL AUTHORITIES

"Delegated Authority is the financial limits that are assigned to individuals within the Trust regarding their ability to approve new projects, and to commit and approve expenditure."

The financial procedures enable the transfer of delegated authority across the Trust. This enables the Trust to increase effectiveness through:

- Streamlining decision-making; and
- Allowing greater flexibility on the use of funds; and
- Motivating and incentivising staff to maximise the return from their funds whilst maintaining sound financial controls.
- **The Board of Trustees** oversees the Trust's financial affairs, provides governance, approves annual budgets and promotes the Trust's objectives. These powers and duties are conferred on the Board by statute. To ensure effectiveness, financial accountability and budgetary control is delegated to the Accounting Officer, the Trust Executive, the Finance Team, members of staff with delegated responsibilities. The Trustees approve the annual budget and account reports. The Academy Trust Handbook places greater emphasis on Trustees' duty to be aware of Charity Commission guidance, and the Companies Act 2006 and charities SORP FRS102. It is the Chair's duty to ensure that all Trustees comply with this duty.
- The Board should ensure it has sufficient and effective financial knowledge and expertise to hold the executive to account. Trustees, and in particular members of the Finance and Risk Committee, should receive financial training covering financial management, control, monitoring and reporting.

*It is responsible for the proper stewardship of those funds, including regularity and propriety, and for ensuring economy, efficiency and effectiveness in their use – the three key elements of value for money.

The Finance and Risk Committee meets half termly, it comprises a Chair (the Trustee for Finance), the Chair of the Trust, the Chief Operating Officer and other Trustees with delegated financial responsibility. The Chief Executive Officer/Accounting Officer and Chief Operating Officer are in attendance.

The Accounting Officer has overall executive responsibility for the financial activities of the Trust ensuring value for money, regularity and propriety. The Accounting Officer is accountable to the Board of Trustees for:

- The initial review and authorisation of the budget.
- The regular monitoring of expenditure and income.
- Ensuring annual accounts are produced in accordance with the Companies Act 2006 and charities SORP FRS102.
- Authorising orders, payments and contracts within limits.
- Authorising changes to personnel establishment.
- Reviewing the audit trail maintained by the Finance Team.
- Periodically checking and signing to confirm that the functions of the Finance Team have been performed properly.
- Signing off the quarterly VAT returns.

Financial affairs, for keeping proper financial records, and for the management of opportunities and risks, the delivery of the trust's detailed accounting processes

The Accounting Officer should be employed by the Trust. The Trust will seek DFE approval in exceptional circumstances to appoint an Accounting Officer who is not an employee.

The Chief Operating Officer and the Team are responsible for the:

- Budgeting and Forecasting
- The regular monitoring of expenditure and income.
- Ensuring annual accounts are produced in accordance with the Companies Act 2006 and charities SORP FRS102.
- Day to day management of the Trust's finances, via PS Financials.
- Preparation of monthly accounts, detailing income and expenditure against budget; and cash balance.
- Authorisation of requisitions and payments within agreed limits.
- Recording of all official orders ensuring financial controls, systems, transactions and risks
- Use of the BMAT virtual credit card when a provider does not accept BACS payment
- Monthly settling of the BMAT virtual credit card.
- Reconciliation of all bank accounts every monthly and reporting of any discrepancies to the Accounting Officer and relevant Bank, for immediate investigation.
- The management and oversight of capital assets
- Preparation of VAT returns and submission online
- Effective planning and oversight of any capital projects
- Ensure good financial management and effective internal controls
- Comply with the funding agreement and the Academy Trust Handbook

Record Retention

- Financial records: Minimum six years from end of financial years

- Governance records: Permanent retention for Trust Board and committee minutes
- Related party transaction records: Maintained permanently
- Procurement records: Seven years for contracts above Procurement Act 2023 thresholds.

The Chief Operating Officer should be employed by the Trust. The Trust will seek DFE approval in exceptional circumstances to appoint a Chief Operating Officer who is not an employee.

Where the Trust has more than 3,000 pupils, any recruitment for the chief financial officer role starting on or after 1 October 2026 should specify a qualified accountant holding membership of a professional body (ICAEW, ACCA, CIMA, CIPFA or equivalent) and/or the CIPFA level 7 qualification. From 1 September 2027 this becomes a requirement, and the DfE must be informed in advance, with an explanation, if the Trust intends to appoint otherwise.

The Trust Executive is responsible for:

- Approving new staff appointments unless they require Trust approval (Vice Principal and above).
- Agreeing the delegated budget and setting school financial targets including milestones.
- Monitoring budget reports and acting on overspends or risk.

Members of Staff with Delegated Responsibilities are responsible for ensuring that their delegated authority is used responsibly and appropriately, by:

- Spending within budget limits unless authorised in writing by the Accounting Officer and Chief Operating Officer.
- Being accountable to the Accounting Officer and School Principal for their expenditure.

Table of Delegated Financial Authorities

Responsibility	Value	Authority	Process
Virtual credit card	up to £1,000 per single transaction per day	Budget Holders (e.g. Heads of Department); *Incl. 1 from list below* BMAT School Principals. The BMAT Chief Operating Officer. The BMAT Chief Executive Officer.	See virtual credit card usage procedure below
Purchase Orders & Invoices	up to £10,000	Budget Holders (e.g. Heads of Department); +Senior Finance and Operating Officer Senior Finance and Operating Officers. + BMAT School Principals. *In the absence of Principal 1 from list below* The BMAT Chief Operating Officer. The BMAT Chief Executive Officer.	Requisition is raised on Web Portal. This is sent to the budget holder to authorise. Finance check order against budget, approve and send to School Principals for final approval. If a supplier does not accept BACs or cheque payment, a request should be made to Finance to use the Trust virtual credit card. Once the goods or services have been provided the order is 'goods receipted' by the individual who requested the goods or services by checking the original order against the one received. Finance will accept this as authorisation for payment purposes.
	Between £10,001 - £50,000	Budget Holders (e.g. Heads of Department); + Senior Finance and Operating Officer Senior Finance and Operating Officers. + BMAT School Principals *Incl. 1 from list below* The BMAT Chief Operating Officer.	

		The BMAT Chief Executive Officer.	Where the goods receipted process cannot be completed, the budget holder must sign the invoice before payment will be processed to the supplier.
	Transactions £50,001 and above, excluding tendered contracts, exam entry costs and business rates.	Budget Holders (e.g. Heads of Department). + Senior Finance and Operating Officer Senior Finance and Operating Officers. BMAT School Principals *Incl. All approvers listed below* +The BMAT Chief Executive Officer +BMAT Chief Operating Officer +Finance & Risk Committee	
	Transactions £50,001 and above, tendered contracts, exam entry costs and business rates.	Budget Holders (e.g. Heads of Department). + Senior Finance and Operating Officer Senior Finance and Operating Officers. + BMAT School Principals *Incl. 1 from list below* The BMAT Chief Operating Officer. The BMAT Chief Executive Officer.	
	Any contract or transaction with a related party. Related parties arise where:	The Chair of the Trust and the BMAT Accounting Officer (CEO) must ensure the following process is applied for transactions	

	One party has control or influence over the other, or where both parties are subject to common control. This includes: - A person, or close member of that person's family, is a related entity if that person has control, joint control or significant influence over the reporting entity (BMAT), or is a member of its key management personnel. - An entity which is related to the reporting entity (BMAT) because it is a parent, subsidiary, fellow subsidiary, associate or joint venture of BMAT; or because they are controlled, jointly controlled or significantly influenced or managed by an individual who is a related party. Such transactions are permitted,	with related parties, across the Trust. The BMAT CEO will authorise contracts with related parties and engage the following process with the DFE.	

	provided open and transparent procurement procedures are followed, and any potential conflicts of interest are adequately managed.		
2. Transactions with related parties (Academy Trust Handbook)	Up to £100,000	CEO, Principals and Chief Operating Officer	BMAT must report all transactions with related parties to the DFE, in advance of the transaction taking place, using the DFE online form. Trusts must obtain DFE's prior approval, using DFE's related party on-line form, for contracts and other agreements for the supply of goods or services to the trust by a related party agreed on or after 1 September 2023 where any of the following limits arise: • a contract or other agreement •exceeding £40,000 in the same financial year ending 31 August• This does not include salaries or other payments made by BMAT, to a person under a contract of employment through BMAT's payroll. The Trust maintains records of all approvals received and ensures compliance with the 14-day notification requirement for governance changes. Approval of novel, contentious and/or repercussive related party transactions Novel, contentious and/or repercussive related party

			transactions are subject to separate arrangements. Trusts must obtain DFE's prior approval for any contracts and other agreements with related parties that are novel, contentious and/or repercussive, regardless of value. Approval must be sought using DFE's related party online form. Trusts should carefully consider the impact of this requirement and its relevance to transactions involving the board chair and/or the accounting officer. BMAT will keep sufficient records, and make sufficient disclosures in its annual accounts, to show that transactions with related parties have been conducted in accordance with the above process, as required by the ATH.
3.Signatories for Cheques	Up to £100,000	CEO, Principals and Chief Operating Officer	Minimum of 2 signatories required at all times Ratified by Finance & Risk Committee
	Above £100,001	Chief Operating Officer and CEO	
4. Signatories for DfE/DFE grant claims and DfE returns	Up to £100,000	Principal and Chief Operating Officer	Minimum of 2 signatories required at all times
5. Approve budget virements	Up to £10,000	Senior Finance and Operating Officer	
	£10,001 - £100,000	Senior Finance and Operating Officer and Chief Operating Officer	

	Above £100,001	Senior Finance and Operating Officer, Chief Operating Officer and CEO	Ratified by Finance & Risk Committee
6. Disposal of fixed assets	Up to £50,000	Chief Operating Officer	Ratified by Finance & Risk Committee
	Above £50,001	Chief Operating Officer and CEO	DfE prior approval is required for acquiring or disposing of freehold land and buildings, and for disposing of heritage assets, regardless of value. Other fixed assets may be disposed of without DfE approval, subject to achieving the best price reasonably obtainable. The Trust maintains records of all asset disposals and ensures appropriate approval is obtained before disposal.
7. Writing off debts	Within ATH delegated limits: up to 1% of total annual income or £45,000 (whichever is smaller) per single transaction, subject to cumulative annual limits of 2.5% or 5% of total annual income (capped at £250,000)	Chief Operating Officer CEO Finance & Risk Committee	
	Beyond the ATH delegated limits above	Chief Operating Officer CEO Finance & Risk Committee DFE	

- The Finance Team will amend purchase orders up to 5% or maximum of £20 if the final invoice does not match the original purchase order due to delivery charges or trivial price changes.

- School Fund monies are kept and recorded separately from the school's capitation monies and securely held.
- In the event of the absence of the CEO, s/he may delegate authority to another member of the Trust Executive, in writing.
- BMAT uses Get Information about Schools to notify the DfE of the appointment and vacating of the positions of Trustees, Governors, the Accounting Officer and the Chief Operating Officer.

QUOTATION AND TENDERING

Refer to separate Trust Procurement Policy

Virtual credit card

The Virtual credit card is issued for the express function to enable it to take advantage of purchasing items, usually over the internet, to achieve best value for money.

Card storage

The card will be stored securely in the Trust safe when not in use and will never be left unattended. The card number and PIN will be stored in the safe and misuse of the card may result in disciplinary action, which will be dependent upon the nature of the breach of the policy.

Virtual credit card Usage Procedure

- A Requisition Form signed by the appropriate budget holder and authorised in accordance with the Scheme of Delegation should be completed in advance for all purchasing transactions, with appropriate research into Value for Money procurement (See procurement policy).
- The authorised requisition form will be passed to the finance department.
- The Senior Finance and Operating Officer will review the authorised requisitions form in accordance with Scheme of Delegation and authorised budget holder mandates.
- The Senior Finance and Operating Officer will only be authorised to use the virtual credit card to complete the transaction in accordance with the requisition form supplier payment and ordering process.
- The Finance department will always be in receipt of the virtual credit card; the credit will never be issued to staff.
- It is necessary to determine whether a VAT receipt will be provided, since VAT cannot be reclaimed without it and goods will be charged to the budget at the VAT-inclusive price.
- All cards must be kept securely in the safe at all times and signed in/out when taken off site.

Recording virtual credit card transactions

The Senior Finance and Operating Officer must complete a transaction log for each purchase and retain receipts and appropriate supporting documentation for all transactions. The Principal or CEO will verify and authorise the Senior Finance and Operating Officer's transaction log.

Reconciliation of the virtual credit card accounts

The accounts will be reconciled by the Senior Finance and Operating Officer, Senior Finance and Operating Officers on a monthly basis. Any unknown card transactions or transactions that are in breach of this policy will be reported to the Accounting Officer and Principal, documented and investigated accordingly.

BUDGETING AND FORECASTING:

- The Finance Team will determine the overall sum within which the budget must be set, and the amount of any anticipated balance to be carried forward into the following financial year.
- The Accounting Officer and Trust Executive are responsible for the detailed preparation of the annual BMAT budget and school/provision budgets. In fulfilling this responsibility, they will
- Consult with members of staff to ascertain detailed requirements; and
- Take account of priorities identified in the Trust Strategy, School Standards and Effectiveness Reports and Key Improvement Priorities; and
- Take account of changes in funding, staff pay, pupil numbers, inflation, the supply of services, facilities, current expenditure and forecasted expenditure.
- Meet in the Spring Term to consider a broad budget strategy with the finance team, and again in the Summer Term to consider and approve the detailed budget and forecast.
- The Board of Trustees are responsible for approving the full budget in the Summer Term, with minutes.
- The approved budget must then be submitted to the DfE, in accordance with the timeline required.
- The approved budget must be communicated to all members of staff with delegated responsibility.
- Budget Forecasts: The Accounting Officer and Trust Executive determine and agree budget forecasts for the following three years and report them to the Board of Trustees on an annual basis.

BUDGET MONITORING

- Members of staff with assigned budgetary responsibilities must monitor their own budget area by:
    - Controlling equipment and stock; and
    - Receiving regular budget statements; and
    - Submitting an annual report and funding request based on operational requirements.
    - Reporting any unique/one off items of expenditure which are not normal for their department to the School Principal, Chief Operating Officer and/or CEO (e.g. large capital items and any items with insurance implications).

        - Reporting monthly to the Finance Team on the variances against their budgets and the forecast of expenditure for the coming year. These meetings will be initiated by the finance department.

- Budget overspend within a department may be deducted from its next annual budget, unless the School Principal authorises otherwise in writing.

- The Accounting Officer and Trust Executive are responsible for regular, detailed monitoring of the BMAT budget. To achieve this, they will analyse monthly budget management reports from the BMAT accounting system. Such reports shall show, for each budget heading:

    - The total annual budget; and
    - The total commitment and expenditure to date
    - Variances analysis with explanations (The Trust Executive is empowered to take remedial action to address variances, by effecting virements between individual budget headings); and
    - Cash flow forecast (minimum 12 months)
    - Pupil number reconciliation
    - Related party transaction register updates
    - Risk register updates for financial risks

- Monthly Management accounts must be shared monthly with the chair of trustees and Chair of finance and risk committee.
- The Accounting Officer, with the support of the Trust Executive, will present detailed termly budget monitoring statements to the Trust and LGB. The Accounting Officer will provide explanations for any significant variances identified.
- The Trust and Finance and Risk Committee will consider these statements, identify any budgetary issues and any remedial action taken or needed.
- When the accounts for each financial year are closed, a final statement from the BMAT accounting system must be presented to the next meeting of the Trust.
- A governance statement, including a review of the Trust's internal controls and internal scrutiny arrangements, must be prepared, approved by the Trustees and included in the audited annual accounts, in line with the Academies Accounts Direction.
- Where the cash flow position is such that a bank account may become overdrawn, the Accounting Officer has the authority to request an early advance from the DFE. The Chair of the Trust must be informed of the cost and reasons for doing so.
- The budget expenditure total must not exceed the amount of the income total plus or minus any balances brought forward from the previous year. If it appears that this cannot be achieved, the Accounting Officer must inform the DFE immediately.
- Where it is identified that the Trust's ability to operate as a going concern is at risk, the Accounting Officer must notify the Board, and the Trustees must take ownership and the necessary action, including notifying the DfE.
- As a multi-academy trust, BMAT must publish on its website by 31 January a summary statement, accompanying the annual accounts, outlining how funds are distributed across its schools.

RESERVES POLICY

Purpose and scope

This section sets out how BMAT determines, holds, manages and reports its reserves. It covers all funds held by the Trust: unrestricted funds, restricted general funds (including General Annual Grant, GAG), restricted fixed asset funds and the pension reserve. It applies across all BMAT schools and central functions.

The Academy Trust Handbook 2026 requires the Board of Trustees to set a policy for holding reserves, to explain it in the annual report, and to include a clear plan for managing reserves. This section meets that requirement and reflects Charity Commission guidance CC19 (Charity reserves: building resilience) and the Charities SORP.

Definitions

- Free reserves: unrestricted funds plus unspent restricted general funds (GAG carried forward), excluding restricted fixed asset funds and the pension reserve. This is the measure the Trust uses for its reserves target.
- Restricted general funds: grant income, principally GAG, which must be spent in line with the funding agreement but may be carried forward. DfE no longer sets a limit on GAG carried forward by eligible trusts.
- Restricted fixed asset funds: funds tied up in land, buildings and other fixed assets, or capital grants. These are not available to spend and sit outside the reserves target.
- Pension reserve: the Trust's share of the Local Government Pension Scheme surplus or deficit under FRS 102. It does not represent cash available to the Trust and is excluded from free reserves.

Why the Trust holds reserves

Reserves protect the Trust's ability to educate its pupils when income falls, costs rise unexpectedly, or an emergency requires immediate spending. Specifically, reserves are held to:

- cover unforeseen costs such as urgent premises works, equipment failure or legal costs;
- manage timing differences in income and expenditure, including in-year cash flow;
- absorb fluctuations in pupil numbers and funding between years;
- meet restructuring or staffing costs that arise from organisational change; and
- fund planned investment in school improvement and the estate without destabilising annual budgets.

Holding reserves is a balance. Too little puts continuity of education and the Trust's status as a going concern at risk. Too much means public money is sitting idle rather than benefiting current pupils, and the DfE may challenge trusts holding substantial unexplained reserves.

Target level of reserves

The Board has set a target range for free reserves of 5% to 10% of the Trust's total annual revenue income, equivalent to roughly two and a half to five weeks of running costs. This range is a starting benchmark proposed for Board adoption; the Board will confirm or adjust it each year when it approves the budget, taking account of the Trust's risk register, pupil number forecasts, the condition of the estate and known future commitments.

The target is reviewed against the Trust's three year budget forecast, not just the year ahead, in line with the requirement to submit a three year Budget Forecast Return to the DfE.

Minimum floor and escalation

The minimum floor for free reserves is 5% of total annual revenue income. The following escalation applies:

- If free reserves are forecast to fall below the floor, the Chief Operating Officer must report this to the Finance and Risk Committee at its next meeting, with a recovery plan to restore reserves to the target range, normally within two financial years.
- If free reserves fall below the floor, or the recovery plan fails, the Board must review and approve a revised plan and consider the impact on the Trust's ability to operate as a going concern.
- If the Trust's ability to operate as a going concern is at risk, the Accounting Officer must notify the Board, and the Trustees must take ownership and the necessary action, including notifying the DfE.
- If free reserves are forecast to exceed 10% of total annual revenue income for more than one year, the Board must agree how the excess will be used or designated for the benefit of pupils, for example investment in teaching, the estate or ICT, and record its rationale in the annual report.

Designated reserves

The Board may designate part of its free reserves for specific future purposes, for example a capital project, an ICT refresh or a known restructuring cost. Each designation must record its purpose, amount and expected timescale. Designations are reviewed annually by the Finance and Risk Committee and released back to general reserves if no longer required. Designated amounts are excluded when measuring free reserves against the target range.

GAG pooling and school level balances

Where the Trust pools GAG, it must consider the funding needs and allocations of each constituent school and operate an appeals mechanism, with unresolved appeals escalated to the DfE. The Trust must publish on its website by 31 January a summary statement, accompanying the annual accounts, outlining how funds are distributed across its schools. School level balances are reported to the Finance and Risk Committee so that reserves held centrally and at school level are visible.

Management and monitoring

The reserves position is reported monthly within the Trust's management accounts, which are shared with the Chair of Trustees and considered by the Board when it meets. Cash backing the reserves is managed under the cash management and investment provisions of this policy: security of funds takes precedence over returns, and surplus funds may be placed in interest bearing accounts in line with the Trust's investment policy.

Reporting

The annual report and accounts will state the reserves policy, the target range, the actual level of free reserves at year end, the reasons for any variance from target, and the plan for managing reserves, including how any designated reserves will be spent. This satisfies the Academy Trust Handbook and CC19.

Review

The Finance and Risk Committee reviews the reserves provisions of this policy annually and recommends them to the Board of Trustees for approval. They are also reviewed when there is a significant change in the Trust's size, funding or risk profile.

Related documents

- Academy Trust Handbook (DfE)
- Charity reserves: building resilience (CC19, Charity Commission)
- Academy trust financial management good practice guides (DfE)

REGISTER OF INTERESTS

"It is important that the Trust, Governors and staff not only act impartially, but are also seen to act impartially."

The academy trust's 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
- for each interest: the name and nature of the business, the nature of the interest and the date the interest began.

"No member, trustee, local governor, employee or related individual or organisation uses their connection to the Trust for personal gain, including payment under terms that are preferential to those that would be offered to an individual or organisation with no connection to the Trust" (ATH)

"The Board of Trustees must ensure requirements for managing related party transactions are applied across the Trust. The Chair of the Board and the Accounting Officer (BMAT CEO) 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 seven principles of public life." (ATH)

Duty to Declare Personal and Business Interests:

- The Trust, LGB and all members of staff have a responsibility to avoid any conflict between their business and personal interests or affairs and those of the Trust.
- There is a legal duty on all Trustees and Governors to declare an interest likely to lead to questions of bias when considering any item of business at a meeting and for the Trustee or Governor concerned to withdraw, if necessary, whilst the matter is considered.
- No payments will be made to any Trustee by BMAT unless permitted by its Articles of Association, or under authority of the Charity Commission and any relevant agreement with the Secretary of State.

Implementing this Duty via the Register of Business Interests:

- The Trust and LGB is required to establish, maintain and publish a register on the Trust website indicating individuals' business/pecuniary interests. This should include, if appropriate, the company by whom they are employed, directorships, significant shareholdings or other appointments of influence within a business or other organisation, which may have dealings with the Trust.
- The register includes an entry for all members of the Trust, Governors, Associate Members and SLT. The Trust must publish the interests of the Accounting Officer.
- Individuals should declare their own personal and/or business interests and those of any member of their immediate family (including partners) or other individuals known to them who may exert influence on or within the Trust.
- It is the responsibility of the Trust Clerk to ensure that the register is up to date and complete. Dated nil returns are also required.
- The Register is retained in the BMAT finance office and made available on request to the Trust, Finance and Risk Committee, LGB, School Principal, staff, parents, and auditors.

Entries on the Register of Business Interests (Countersigning):

- The register sheet must be signed and dated by the individual and countersigned by the Chair of the Trust/CEO to indicate that s/he has noted any declarations.
- Entries by the Chair of the Trust should be countersigned by the CEO. Entries by the CEO should be countersigned by the Chair of the Trust.
- Entries by the Chair of Governors should be countersigned by the Chair of the Trust Entries by the School Principal should be countersigned by the CEO.
- The Trust must publish the relevant business and pecuniary interests of its Accounting Officer, regardless of whether s/he is a trustee.
- Governors are included when identifying relevant interests from close family relationships.
- Entries by any other member of staff or individual in a position to influence financial decisions within the Trust should be countersigned by the CEO and the School Principal.
- Entries by a staff member who is also a member or associate member of the LGB should be countersigned by the Chair of Trust, who should bring any declared interests to the attention of the CEO.
- The Register must be considered when authorising delegated authority limits, approving new projects and committing to or approving expenditure.
- **Opportunity to declare business interests at meetings:**
- There is a standing "Declaration of Pecuniary Interest" agenda item at every meeting of the Trust and LGB, to allow Trustees and Governors the opportunity to declare any interests relating to items on the agenda.

HOSPITALITY AND GIFTS

"There should be a clear business justification for any hospitality or gift which is funded by the Trust or accepted by staff, which must meet the test of reasonableness:

Where reasonableness is defined as

- appropriate for a recognisable business purpose.
- The hospitality or gift provided or accepted should be affordable, and

Where reasonableness is defined as

- appropriate for a recognisable business purpose.
- The hospitality or gift provided or accepted should be affordable, and
- appropriate to the occasion and not damage the Trust's reputation;"
- Business gifts and hospitality should neither be received nor given by any member of staff, except as provided for below. This helps to ensure that:
- No undue influence has been exerted or could be said to have been exerted by any supplier or anyone else dealing with the Trust.
- All decisions are reached on the basis of value for money and no other reason.
- Any breach of this Policy may lead to disciplinary action and may constitute gross misconduct.

Professional Conduct when Accepting Hospitality/Gifts.

- Employees shall not use their authority or office for personal gain and shall seek to uphold and enhance the standing of the Trust by:
    - Only accepting gifts, rewards or benefits from individuals/organisations with whom the Trust has contact if they are isolated or trivial in nature (e.g. diaries or calendars). Gifts should not be accepted if they are disproportionate or could be construed as an inducement to affect a business decision. Conventional hospitality (events etc.) may be accepted, provided there is reasonable business justification for doing so; and
    - Recording any gift or hospitality over £50 in the Register of Business Interests; and
    - Maintaining an unimpeachable standard of honesty and integrity in all their business relationships; and
    - Complying with the letter and spirit of the law and contractual obligations; rejecting any business practice that might be deemed improper; and
    - At all times in their business relationships acting to maintain the interests and good reputation of the Trust.
    -
- When the Trust spends money on hospitality or gifts, the occasion must, so far as possible, produce a clear benefit for the Trust, with no personal benefit for members of staff or Governors.
- Public money should not be used for providing hospitality for or funding the personal consumption of staff, however:
    - If a member of staff is undertaking lunchtime supervision duties, then they are entitled to claim their lunch.
    - During training days or lunchtime/afterschool meetings, reasonable food and refreshments may be provided, subject to budget constraints.

- Visitor Hospitality:

- A pool of refreshments for consumption by visitors to the school/academy is permitted and the purchase of these items can be made through the appropriate budget.
- A light lunch may be provided at lunchtime meetings.

- Expenditure on hospitality and gifts beyond the above is at the discretion of the Trust Executive, with reference to the spirit of this policy.
- Any employee who becomes aware of a breach of this policy must report it immediately to his or her manager, who will instigate investigations as necessary.

CHARGING AND REMISSIONS.

- The Trust is dedicated to providing a well-rounded and extensive education for all of its students, which includes a wide range of extra-curricular activities.
- The Trust operates a cashless payment system for all chargeable services: All students are set up with a Parent Pay account upon admission which can be topped up online and at local Pay Points to contribute towards school meals, trips, music lessons and exam fees.
- There is no charge for:

    - Admissions or examinations that are part of the curriculum and/or or on the Trust's set examinations list provided the student has been prepared for the examination by the Trust.
    - Free school meals.
    - Activities/education during school hours with the exception of music tuition that is not part of the national curriculum or public examination syllabus being followed by the student.
    - Transport during school hours to school-organised activities.
    - Education provided on any visit that takes place during school hours.
    - Non-residential activities that take place outside school hours when they are part of the set curriculum or part of the syllabus for a public exam that the pupil is being prepared for by the Trust.

- However, the Trust may charge for:

    - Materials that parents wish for their child to keep and music or vocal tuition.
    - Optional extras that are not part of the national curriculum, a syllabus for a public exam that the pupil is being prepared for by the Trust or part of religious education. This includes transport outside school hours and/or to a location where the LA or Trust has not arranged for the pupil to be educated; residential activities outside school hours; board/lodging on residential visits; and a 5% admin charge for arranging these activities.
    - Wilful or reckless damage to the property of the Trust or a third party, at the discretion of the School Principal and dependent on the circumstances.

- Determining Cost:

- The School Principal will decide when and how much it is necessary to charge for optional extras, on advice from Finance.
- The level of charge will not exceed the actual cost of providing the activity per pupil and no parent will be asked to subsidise others.
- Charges will be communicated to students and parents/carers as far as possible in advance of the event/activity.
- Charges may cover the cost of providing non-teaching staff or engaging teaching staff specifically to provide the optional extra.
- Parents who can prove that they are in receipt of certain benefits may be exempt from being charged for residential/boarding costs.

Remissions, concessions and inability or unwillingness to pay.

The Trust, under the authority of the School Principal, will give confidential consideration to the remission of charges to students whose parents are unable or unwilling to pay; and to parents or carers in receipt of the following benefits, which entitle their children to free school meals and free music/vocal tuition within school hours:

- Income Support.
- Income based Job-seekers Allowance.
- Child Tax Credit (where the person is not receiving Working Tax Credit as well).
- Support under part VI of the Immigration and Asylum Act 1999.
- Guaranteed Element of State Pension Credit.
- Income related employment and support allowance.
- Universal Credit (until the end of the 2025/26 academic year, subject to the £7,400 annual earned income threshold; from September 2026, all children in households receiving Universal Credit are eligible for free school meals).
- Working Tax Credit run-on, paid for 4 weeks after a person stops qualifying for Working Tax Credit.
- Children in care are also entitled to free vocal/instrumental tuition.

Voluntary Contributions

- The Trust may ask for voluntary contributions for general funds and/or to fund activities that will enrich our pupils' education.
- In any case where an activity cannot be afforded without voluntary funding, this will be made clear to parents. If the activity is cancelled all monies paid will be returned to parents.
- There is no obligation for a parent or carer to make any contribution, and the Trust will in no way pressure parents to make a contribution.

Petty Cash

- Petty Cash Floats are limited to:

£200 Beal High School

£100 The Forest Academy
£100 Beacon Business Innovation Hub

- Petty cash withdrawals are limited to a maximum of £30 per transaction.
- Petty cash is limited to emergency use only.
- The Trust will under no circumstance authorise reimbursement of out-of-pocket expenditure from petty cash.
- One petty cash float held at The Forest Academy, three at Beal High School and one at the Beacon Business Innovation Hub.
- Upon completing a petty cash voucher with the correct authorisation and budget code from the department incurring the expenditure, a discretionary amount no greater than £30 may be issued. This must be no more than is necessary in the circumstances.
- Once available all receipts must be submitted to finance and attached to the original petty cash voucher.

Commercial Charging: Subject to the above, the Trust may set charges at a rate of return above cost, when in a commercial environment (e.g. see Lettings policy).

PAYROLL AND BUSINESS EXPENSES

Payroll:

- A list of authorised payroll signatories must be maintained by the Accounting Officer.
- Payroll data must be scrutinised by staff in a position of seniority in HR and Finance, or their delegates where appropriate, to ensure that all employees are recognised, that pay appears reasonable and that calculations are accurate. Payroll data is approved by the Accounting Officer.
- The monthly payroll must be approved by the Principals, Accounting Officer or Chief Operating Officer in the absence of the Accounting Officer.

Executive pay (CEO and senior leadership) must be reasonable and defensible in accordance with the Academy Trust Handbook. The Finance and Risk Committee must review and approve executive remuneration annually, ensuring it represents value for money and is benchmarked appropriately. Business expenses incurred through a staff normal course of duties are reimbursed through Payroll. The deadline and form to submit business expense claims to the Finance Team is communicated via a monthly email to all staff, and in the relevant school bulletin.

Executive remuneration must not increase at a faster rate than that of the Trust's teachers unless there is clear justification, in which case DfE approval must be sought in advance.

Electric vehicle salary sacrifice schemes may be offered without prior DfE approval, provided the Trust documents comprehensive mitigations so that no cost or liability falls on the Trust if an employee defaults, and the Trust is not under a Notice to Improve.

From 1 October 2026, the Trust must obtain DfE approval before offering any alternative to the Teachers' Pension Scheme or the Local Government Pension Scheme, and before any proposed change is communicated to staff.

- Before submitting a business expense claim to finance, the necessary approvals for reimbursement must be obtained from the applicant's line manager (or lunch time supervisor in the case of claims for lunch time duties), with any VAT receipts attached.
- Business expenses must be claimed within 3 months of the cost being incurred. Claims received after the 3-month deadline will not be reimbursed. The reimbursement of business expenses claims will not be taxed.
- Trustees and Governors agree that subsistence and traveling expenses may be paid to all Trustees and Governors. Expense claims must be minimised and supported with receipts. Processed claims will be included in the annual accounts.
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SPECIAL STAFF SEVERANCE PAYMENTS

- The Trust will seek prior approval from the DFE before making any special staff severance payments where:
    - An exit package includes a special severance payment at or above £100,000; and/or
    - The employee earns over £174,000
- A 'special' severance payment is one that "doesn't correspond to an established contractual, statutory or other right."
- From 1 October 2026, the Trust must also obtain DfE approval before advertising any new post where remuneration exceeds £174,000 (or the pro rata equivalent for part time staff), or where performance related pay exceeds £25,000.

INDEMNITIES

- The Trust will seek prior approval from the DFE before entering into indemnities that aren't 'in the normal course of business.'
    - Contracts in the normal course of business include:
    - Catering contracts
    - Data-sharing agreements
    - Contracts for utilities such as electricity and gas
    - Commercial IT support contracts
    - Land transactions

- The Trust will seek DFE approval for any contract which is 'novel, contentious or repercussive.'

ASSET REGISTER AND INVENTORY

- The portable, desirable and attractive assets of the school, as well as any assets of intrinsic value, will be recorded in the school's inventory. Full details (make, model, serial number, approximate value) shall be recorded, subject to a minimum value of £10,000.
- The School Principals will check the inventories annually and notify the Accounting Officer of any discrepancies.
- Heads of Department (HoDs) are responsible for keeping their individual department's inventory up to date by adding new items when they are received into school.
- Inventories shall cover all areas of the school and be arranged on a room-by- room basis. A separate inventory will be maintained for items which are not allocated to a specific room.
- Disposals are as per the delegated table of authority above.

- Off-site Register: Any inventory items taken off-site by members of staff for official purposes must be recorded in an off-site register.
- Depreciation: The Trust will depreciate fixed assets in line with recognised accounting standards, DfE guidelines and external auditors.

INTERNAL TRIPS (See BMAT trips and visits policy)

- Curriculum based trips will be funded by the relevant department and the organiser will make a request to finance to make payment with authorisation from the HoD.
- For non-curriculum-based trips, trip organisers will be required to demonstrate that sufficient funds have been collected from students to support the booking fee request sent to finance.
- Once a trip has been approved, trip organisers should contact the data team to have the trip set up on Parent Pay, which is the only accepted method of collecting trip income:

  trips@bealhighschool.co.uk
  trips@theforestacdemy.co.uk
  trips@bbih.org

- Students who receive free school meals may be required to pay for trips. Trip organisers should provide details of these students to Data department requesting a transfer from 'School Funds' to cover the cost of these pupils.
- A review should be completed by trip organisers to ensure all income either from students or transfers from the school fund has been correctly. They should then advise the Data Team that this payment item should be archived within Parent Pay and the trip should be closed.
- Students who were unable to attend the trip but had made payment should request a refund from the Data Team which should be authorised by the trip organiser. This will be returned to the payers account for them to withdraw into their bank account. Contact

  data@bealhighschool.co.uk
  data@theforestacademy.co.uk
  data@bbih.org

- TfL offer free travel for a maximum of two adults for every 10 children in a school party. You must apply online at least 14 days in advance of the date of travel: TFL

RISK MANAGEMENT (ANTI-FRAUD, CORRUPTION AND BRIBERY)

- BMAT implements and maintains systems of accountability and control (which are present throughout this policy) to ensure that its resources are properly managed and applied. These systems include, as far as is practical, adequate internal controls to detect significant errors as well as fraud, bribery and corruption.

- BMAT recognises the importance of the seven principles of public life defined by the Nolan Committee 1995:

    - BMAT requires its trustees, governors, employees and agents to act in accordance with these principles; and be alert to the possibility of fraud, corruption and dishonesty in all their dealings.

- BMAT expects that individuals and organisations (e.g. partners, suppliers, contractors, and service providers) will act with integrity and without thought or actions involving fraud and corruption.
- BMAT also requires that those employees responsible for its systems and procedures should design and operate systems and procedures which minimise losses due to fraud, corruption, and other dishonest action and abuse.

- Evidence of fraud, bribery, corruption or abuse of position for personal gain is most likely to lead to a termination of contract and prosecution. BMAT considers that all instances of fraud, corruption and other dishonesty endanger the achievement of its policies and objectives as they divert its limited resources from the provision of education, threaten its sound financial standing and undermine its reputation.

- Fraud is covered by the Fraud Act 2006 and can be defined as:

    - An intentional abuse of knowledge or financial position that is done deliberately to create a financial gain for the perpetrator or for a related person or entity and/or cause a loss to another (e.g. by withholding information, deliberately misleading, misrepresenting a situation to others or by abuse of position).
    - Gains and losses do not have to be direct. A gain to a related party or company through intentional abuse of position, albeit not directly to the officer involved, is still fraudulent. In the same way, using BMAT's name to procure personal goods and services is also fraudulent; where there is deliberate abuse of position to make a gain in the form of goods and services at a discount price or to get BMAT to pay for them.

- Corruption will normally involve the above with some bribe, threat or reward being involved.

- Bribery is covered by The Bribery Act 2010 and includes: accepting a bribe, bribing another person, bribing a foreign official and failing to prevent bribery. BMAT does not tolerate bribery, It is unacceptable to:
    - Give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given.
    - Give, promise to give, or offer a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure.
    - Accept payment from a third party that you know, or suspect is offered with the expectation that it will obtain a business advantage for them.
    - Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by BMAT in return.
    - Retaliate against or threaten a person who has refused to commit a bribery offence or who has raised concerns under this policy.

- Facilitation payments (i.e. unofficial payments made to public officials in order to secure or expedite actions) are not tolerated and are illegal.
- Internal Audit is performed annually for one week covering both financial and non-financial controls. Internal Auditors are appointed by and report to the BMAT Finance and Risk Committee. The main responsibilities of the independent Internal Auditors are to provide impartial assurance that:

    - The financial responsibilities of the Board are being properly discharged.
    - Resources are being managed in an efficient, economical and effective manner.
    - Sound systems of internal financial control are being maintained; and
    - Financial considerations are fully considered when reaching decisions.

Internal audit services cannot be provided by the same firm providing the external audit services.

- External Audit is performed annually for one week. Final accounts are prepared at the end of the financial year by the Accounting Officer and the Finance Team. The accounts are audited by an auditor appointed by the full Trust/LGB, in accordance with the requirements laid down in the Academy Trust Handbook. The auditor will not be a member of the Trust/LGB.
- Raising Concerns: Items which do not have detailed record of expenditure or do not appear to be for bona fide school purposes must be immediately reported to the Accounting Officer and School Principal, followed by a full and immediate investigation. Governors, Trustees, BMAT employees and associated persons should follow the guidance issued in the Whistleblowing Policy, which adheres to the recommendations of the Academy Trust Handbook:
    - All concerns reported, by whatever method, will be treated in confidence.
    - Concerns should be raised with the School Principal in the first instance except when it relates to the School Principal or Chief Operating Officer, in which case the concern should be raised with the CEO.
    - If the concern relates to the CEO, it should be raised with the Chair of the Trust.
    - Depending on the level, type and details of a concern, it may be investigated by the Principal, the Board of Trustees or the Police.

Estates management

The Trust's estate management strategy ensures the estate is in safe working condition in conjunction with the Trust's Health and Safety policy.

Health and Safety

The Trust has a separate Health and Safety policy to ensure its responsibilities are met as an employer.

BMAT Policies

Safeguarding

Academy trust boards have a duty to:

- • safeguard and promote the welfare of children
- • have regard to any statutory guidance on safeguarding issued by the Secretary of State
- • ensure the suitability of staff, supply staff, volunteers, contractors and proprietors.

The Trust has separate school safeguarding policies, link to the Trust's website is provided below.

BMAT Policies

Digital and Technology Standards

The Trust adheres to the digital and technological standards set by the DFE and takes appropriate action to meet DfE's cyber security standards to improve resilience against cyber-attacks.

Key requirements include:

- Regular assessment against DfE digital and technology standards

- Implementation of appropriate cyber security measures

- Staff training on cyber security awareness

- Incident response procedures that do not include ransom payments

- Regular backup and recovery testing

Cyber Crime risk is managed by the Trusts RPA Cyber Response Plan outlining the steps to be taken in the event of a cyber-attack.

The Trusts Cyber Response Plan is a comprehensive plan as part of an overall business continuity plan to safeguard pupils and staff and restore the school to an operational standard

Ransomware payments are strictly prohibited :

"Trusts must not pay any cyber ransom demands. DfE supports the National Crime Agency's recommendation not to encourage, endorse, ..."