



Board of Trustees of the City of London Academies Trust

Date: THURSDAY, 9 JULY 2020

Time: 9.00 am

Venue: VIRTUAL PUBLIC MEETING (ACCESSIBLE REMOTELY)

Members: Andrew McMurtrie (Chair)
Roy Blackwell (Vice-Chair)
Peter Bennett
Tijs Broeke
Ann Holmes
Deputy Clare James
Rehana Ameer (Co-opted Trustee)
Edward Benzecry (Co-opted Trustee)
Dawn Elliott (Co-opted Trustee)
Lucas Green (Co-opted Trustee)

Enquiries: Kerry Nicholls
Kerry.Nicholls@cityoflondon.gov.uk

Accessing the virtual public meeting

Members of the public can observe this virtual public meeting at the below link:

<https://youtu.be/ro2OMEUs0p8>

**John Barradell
Town Clerk and Chief Executive**

AGENDA

1. **APOLOGIES**

2. **DECLARATIONS**

3. **ELECTION OF CHAIRMAN**

To elect a Chairman for 2019/20 in line with Article 82.

For Decision

4. **MINUTES**

To agree the public minutes and non-public summary of the meeting held on 19 March 2020.

For Decision
(Pages 1 - 4)

5. **COMMITTEE MINUTES**

a) Minutes of the Finance, Audit and Risk Committee

To receive the public minutes of the Finance, Audit and Risk Committee meeting held on 1 July 2020 (To Follow).

b) Minutes of the Standards and Accountability Committee

To receive the public minutes of the Standards and Accountability Committee meeting held on 30 April 2020.

For Information
(Pages 5 – 6)

6. **APPOINTMENT OF CO-OPTED TRUSTEE**

Report of the Town Clerk.

For Decision
(Pages 7 - 8)

7. **POLICIES FOR THE TRUST**

Report of the Chief Financial Officer.

For Decision
(Pages 9 - 132)

8. **COLAT ACADEMIES DEVELOPMENT PROGRAMME - UPDATE**

Report of the Director of Community and Children's Services.

Trustees are asked to note five non-public appendices at Agenda Item 16.

For Decision
(Pages 133 - 146)

9. **SCHOOL PLACES DEMAND PROJECTIONS**

Report of the Director of Community and Children's Services.

For Information
(Pages 147 - 160)

10. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**

11. **ANY OTHER BUSINESS**

12. **EXCLUSION OF THE PUBLIC**

MOTION – That the public be excluded for the remaining items of business as they are likely to involve discussion on matters deemed commercially sensitive to the City of London Academies Trust.

For Decision

13. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held on 19 March 2020.

For Decision
(Pages 161 - 168)

14. **NON-PUBLIC COMMITTEE MINUTES**

a) Non-Public Minutes of the Finance, Audit and Risk Committee

To receive the non-public minutes of the Finance, Audit and Risk Committee meeting held on 1 July 2020 (To Follow).

b) Non-Public Minutes of the Standards and Accountability Committee

To receive the non-public minutes of the Standards and Accountability Committee meeting held on 30 April 2020.

For Information
(Pages 169 – 174)

15. **OUTSTANDING ITEMS**

Report of the Town Clerk.

For Information
(Pages 175 - 176)

16. **COLAT ACADEMIES DEVELOPMENT PROGRAMME - UPDATE - NON-PUBLIC APPENDICES**

Report of the Director of Community and Children's Services.

Non-Public appendices to be read in conjunction with Agenda Item 8.

For Information
(Pages 177 - 216)

17. **APPOINTMENTS TO LOCAL GOVERNING BODIES AND APPOINTMENT OF CHAIRS TO LOCAL GOVERNING BODIES**

Report of the Town Clerk.

Trustees are asked to note five confidential appendices at Agenda Item 33.

For Decision
(Pages 217 - 220)

18. **CEO EXECUTIVE SUMMARY**

Report of the Chief Executive Officer.

For Information
(Pages 221 - 230)

19. **COVID-19 UPDATE AND RECOVERY PLAN**

Report of the Chief Executive Officer.

For Decision
(Pages 231 - 240)

20. **SCHEME OF DELEGATION ANNUAL UPDATE**

Report of the Chief Executive Officer.

For Decision
(Pages 241 - 244)

21. **STRATEGIC PLAN REVIEW 2020-24**

Report of the Chief Executive Officer.

For Decision
(Pages 245 - 248)

22. **CHIEF FINANCIAL OFFICER'S UPDATE**

Report of the Chief Financial Officer.

Trustees are asked to note two confidential appendices at Agenda Item 34.

For Decision
(Pages 249 - 320)

23. **HUMAN RESOURCES UPDATE**

Report of the Human Resources Director.

For Decision
(Pages 321 - 348)

24. **COLAT SCHOOLS SAFEGUARDING MONITORING UPDATE**

Report of the Chief Executive Officer.

Trustees are asked to note confidential information at Agenda Item 35.

For Information
(Pages 349 - 370)

25. **TRUST SCHOOLS' CALCULATED GRADES**

Report of the Chief Executive Officer.

For Information
(Pages 371 - 374)

26. **PRE-APPRENTICESHIP PROVISION UPDATE**

Report of the Chief Executive Officer.

For Decision
(Pages 375 - 384)

27. **ICT UPDATE**

Report of the Director of Information and Communication Technology.

For Information
(Pages 385 - 392)

28. **ESTATES AND FACILITIES UPDATE ON TRUST SCHOOLS**

Report of the Director of Estates and Facilities.

For Information
(Pages 393 - 396)

29. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**

30. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT AND TRUSTEES AGREE SHOULD BE CONSIDERED WHEN THE PUBLIC ARE EXCLUDED**

Confidential Agenda - Circulated Separately

31. **CONFIDENTIAL MINUTES**

To agree the confidential minutes of the meeting held on 19 March 2020.

For Decision

32. **CONFIDENTIAL COMMITTEE MINUTES**

- a) Confidential Minutes of the Finance, Audit and Risk Committee

To receive the confidential minutes of the Finance, Audit and Risk Committee meeting held on 1 July 2020 (To Follow).

- b) Confidential Minutes of the Standards and Accountability Committee on 30 April 2020

To receive the confidential minutes of the Standards and Accountability Committee meeting held on 30 April 2020.

For Information

33. **APPOINTMENTS TO LOCAL GOVERNING BODIES AND APPOINTMENT OF CHAIRS TO LOCAL GOVERNING BODIES - CONFIDENTIAL APPENDICES**

Report of the Town Clerk.

Confidential appendices to be read in conjunction with Agenda Item 17.

For Information

34. **CHIEF FINANCIAL OFFICER'S UPDATE - EXTRACT FROM NON-PUBLIC REPORT**

Confidential appendices to be read in conjunction with Agenda Item 22.

For Information

35. **COLAT SCHOOLS SAFEGUARDING MONITORING UPDATE - EXTRACT FROM NON-PUBLIC REPORT**

Confidential information to be read in conjunction with Agenda Item 24.

For Information

BOARD OF TRUSTEES OF THE CITY OF LONDON ACADEMIES TRUST

Thursday, 19 March 2020

Minutes of the meeting of the Board of Trustees of the City of London Academies Trust held at the Guildhall EC2 at 9.00 am

Present

Members:

Andrew McMurtrie (Chair)	Deputy Claire James (by conference call)
Roy Blackwell (Vice-Chair)	Edward Benzecry (by conference call)
Peter Bennett	Dawn Elliott (by conference call)
Tijs Broeke (by conference call)	Lucas Green (by conference call)

Officers:

Kerry Nicholls	- Clerk
Mark Emmerson	- Chief Executive
Claire Hersey	- Chief Financial Officer
Katyryna Zamulinskyj	- Human Resources Director (by conference call)

1. APOLOGIES

Apologies for absence were received from Rehana Ameer and Ann Holmes.

The Chair thanked Trustees and Officers for attending the meeting, both in person and via conference call, and led the Board of Trustees in thanking both the teaching and non-teaching staff of the City of London Academies Trust, as well as the Trust's Central Team for their hard work and dedication in responding to measures to contain the COVID-19 (Coronavirus).

The Chair requested that the Clerk take the necessary steps to ensure that the quoracy of future meetings of the Board of Trustees would include Trustees attending by conference call and this would be taken forward following the meeting.

2. DECLARATIONS

There were no declarations.

3. MINUTES

RESOLVED, that the public minutes and non-public summary of the meeting held on 12 December 2019 be approved as a correct record.

4. COMMITTEE MINUTES

a) Minutes of the Finance, Audit and Risk Committee

RESOLVED, that the public minutes and non-public summary of the Finance, Audit and Risk Committee meeting held on 27 February 2020 be received.

b) **Minutes of the Standards and Accountability Committee**

RESOLVED, that the public minutes and non-public summary of the Standards and Accountability Committee meeting held on 6 February 2020 be received.

5. **COLAT ACADEMIES DEVELOPMENT PROGRAMME - UPDATE**

Trustees considered an update of the Director of Academy Development on the Academies Development Programme and the following point was made:

- It was likely that the capital build programme at the City of London Primary Academy Islington would be affected by the COVID-19 pandemic. There had been no delay to building works as at 18 March 2020, but the construction industry was highly likely to be affected by nation-wide measures to contain the virus.

RESOLVED, that Trustees note the update.

6. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**

There were no questions.

7. **ANY OTHER BUSINESS**

There was no other business.

8. **EXCLUSION OF THE PUBLIC**

RESOLVED, that the public be excluded from the following items of business.

9. **NON-PUBLIC MINUTES**

RESOLVED, that the non-public minutes of the meeting held on 12 December 2019 be approved as a correct record.

10. **NON-PUBLIC COMMITTEE MINUTES**

a) **Non-Public Minutes of the Finance, Audit and Risk Committee**

RESOLVED, that the non-public minutes of the Finance, Audit and Risk Committee meeting held on 27 February 2020 be received.

b) **Non-Public Minutes of the Standards and Accountability Committee**

RESOLVED, that the non-public minutes of the Standards and Accountability Committee meeting held on 6 February 2020 be received.

11. **OUTSTANDING ITEMS**

Trustees considered a report of the Clerk setting out outstanding actions from previous meetings.

a) **Delegated Actions Digest**

Trustees considered a summary of the Clerk providing details of one action taken under Delegated Authority since the meeting of the Board of Trustees on 12 December 2019.

12. **COLAT ACADEMIES DEVELOPMENT PROGRAMME - UPDATE - APPENDIX 1**

Trustees considered a non-public appendix for Item 5: CoLAT Academies Development Programme – Update.

13. **STRATEGIC PLAN REVIEW 2020-24**

Trustees considered a report of the Chief Executive Officer on the City of London Academies Trust Strategic Plan Review.

14. **CEO EXECUTIVE SUMMARY**

Trustees considered an Executive Summary of the Chief Executive Officer.

15. **CITY OF LONDON ACADEMIES TRUST – EXPANSION BY THE TRANSFER OF THE TWO CO-SPONSORED ACADEMY TRUSTS**

Trustees considered a report of the Director of Academy Development on the proposed expansion of the Trust by the transfer of two academies co-sponsored by the City of London Corporation.

16. **CHIEF FINANCIAL OFFICER'S UPDATE**

Trustees considered an update report of the Chief Financial Officer.

17. **HUMAN RESOURCES - UPDATE**

Trustees considered an update report of the Human Resources Director.

18. **DATA SUMMARY UPDATE**

Trustees considered a report of the Chief Executive Officer presenting an update on key data relating to attendance, exclusions and off-rolling.

19. **IMPACT VISITS UPDATE**

Trustees considered a report of the Chief Executive Officer presenting the Spring Term summaries of the Impact visits.

20. **ICT DIRECTOR UPDATE AND APPROVALS**

Trustees considered an update report of the Director of Information Communication and Technology.

21. **COLAT SCHOOLS SAFEGUARDING MONITORING UPDATE**

Trustees considered a report of the Chief Executive Officer providing an update on Safeguarding Monitoring across Trust schools.

22. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**

There were no non-public questions.

23. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT AND TRUSTEES AGREE SHOULD BE CONSIDERED WHEN THE PUBLIC ARE EXCLUDED**

There was one item of other business.

24. **CONFIDENTIAL MINUTES**

RESOLVED, that the confidential minutes of the meeting held on 12 December 2019 be approved as a correct record.

25. **CONFIDENTIAL COMMITTEE MINUTES**

a) **Confidential Minutes of the Finance, Audit and Risk Committee**

RESOLVED, that the confidential minutes of the Finance, Audit and Risk Committee meeting held on 27 February 2020 be received.

b) **Confidential Minutes of the Standards and Accessibility Committee**

RESOLVED, that the confidential minutes of the Standards and Accountability Committee meeting held on 6 February 2020 be received.

26. **COLAT SCHOOLS SAFEGUARDING MONITORING UPDATE - EXTRACT FROM NON-PUBLIC REPORT**

Trustees considered confidential information on Safeguarding Monitoring across Trust schools.

The meeting closed at 10.35 am

Chair

Contact Officer: Kerry Nicholls
Kerry.Nicholls@cityoflondon.gov.uk

STANDARDS AND ACCOUNTABILITY COMMITTEE OF THE CITY OF LONDON **ACADEMIES TRUST**

Thursday, 30 April 2020

Minutes of the meeting of the Standards and Accountability Committee of the City of London Academies Trust held via Microsoft Teams at 9.00 am

Present

Members:

Tijs Broeke (Chair)
Edward Benzecry
Roy Blackwell

Ann Holmes
Andrew McMurtrie

Officers:

Mark Emmerson
Natalie Williams

- Chief Executive Officer
- Clerk

1. APOLOGIES

No apologies were noted.

2. DECLARATIONS

There were no declarations.

3. MINUTES

RESOLVED, that the minutes of the meeting held on 6 February 2020 be approved as a correct record.

4. OUTSTANDING ACTIONS

Trustees considered a report of the Clerk regarding outstanding actions arising from previous meetings.

RESOLVED, that the report be noted.

5. QUESTIONS

There were no questions.

6. ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT

There was no other business.

7. EXCLUSION OF THE PUBLIC

RESOLVED, that the public be excluded from the following items of business.

8. NON-PUBLIC MINUTES

RESOLVED, that the non-public minutes of the meeting held on 6 February 2020 be approved as a correct record.

9. OUTSTANDING ACTIONS

Trustees considered a report of the Clerk regarding outstanding actions arising from previous meetings.

10. **COVID-19 UPDATE**
Trustees considered a report of the Chief Executive Officer presenting an update on COVID-19.
11. **LEADERSHIP PERFORMANCE REVIEW - ANNUAL REPORT**
Trustees heard the annual leadership performance report from the Chief Executive Officer.
12. **STRATEGIC PLAN REVIEW 2020-24**
Trustees considered a report of the Chief Executive Officer providing an update on the Strategic Plan Review 2020-24.
13. **PARENT, COMMUNITY AND COMMERCIAL LINKS SURVEY 2020**
Trustees considered a report of the Chief Executive Officer presenting the Findings of the Parent, Community and Commercial Links Survey 2020.
14. **ACADEMIES AT A GLANCE - ACADEMIES SUMMARY**
Trustees considered a report of the Chief Executive Officer presenting the Academies at a Glance summary.
15. **PRE-APPRENTICESHIP PROGRAMME PROPOSAL - NEXT STEPS**
Trustees considered a report of the Chief Executive Officer providing an update on the Pre-Apprenticeship Programme proposal.
16. **EXCLUSIONS MONITORING SPRING 2020**
Trustees considered a report of the Chief Executive Officer presenting information on exclusions monitoring for the Spring 2020 term.
17. **NON-PUBLIC QUESTIONS**
There was one non-public question.
18. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT THAT THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED.**
There was no urgent business.
19. **CONFIDENTIAL MINUTES**
RESOLVED, that the confidential minutes of the meeting held on 6 February 2020 be approved as a correct record.
20. **HR UPDATE**
Trustees considered a confidential HR update.

The meeting closed at 10.10 am

Chair

Contact Officer: Natalie.Williams@cityoflondon.gov.uk

Committee: Board of Trustees of the City of London Academies Trust	Date(s): 9 July 2020
Subject: Appointment of Co-opted Trustee	Public
Report of: Town Clerk	For Decision
Report author: Kerry Nicholls, Town Clerk's Department	

Summary

The Articles of Association of the City of London Academies Trust specify under Article 58 that the Board of Trustees may appoint Co-opted Trustees, subject to the requirement in Article 47 for Trustees appointed under Articles 46a and 50 to be in the majority.

The Board of Trustees agreed the appointment of Dawn Elliott as a Co-opted Trustee to the City of London Academies Trust Board of Trustees for a four-year term commencing 6 July 2016. It is requested that the Board of Trustees consider the reappointment of Ms Elliott as a Co-opted Trustee of the City of London Academies Trust Board of Trustees for a further four-year term commencing 9 July 2020.

Recommendation

The Board of Trustees is asked to consider the reappointment of Dawn Elliott as a Co-opted Trustee of the City of London Academies Trust Board of Trustees for a further four-year term commencing 9 July 2020.

Main Report

Background

1. The Articles of Association of the City of London Academies Trust specify under Article 58 that the Board of Trustees may appoint Co-opted Trustees, subject to the requirement in Article 47 for Trustees appointed under Articles 46a and 50 to be in the majority. In appointing Co-opted Trustees, the Trustees must have regard to the need for the Board of Trustees to have a balance of skills and experience and to appoint suitably qualified individuals who support the purposes of the Academy Trust and can commit the time necessary to fulfil the role of Trustee.
2. Dawn Elliott was appointed as a Co-opted Trustee to the City of London Academies Trust Board of Trustees for a four-year term commencing 6 July 2016. Ms Elliott has expressed a willingness to stand for reappointment as a Co-opted Trustee of the Board of Trustees for a further four-year term.

3. Since her last appointment to the Board of Trustees, Ms Elliott has attended 11 out of a possible 16 meetings of the Board of Trustees and is a member of the Finance, Audit and Risk Committee. Ms Elliott is also the Chair of Governors of the City Academy, Hackney which is a co-sponsored academy of the City of London Corporation seeking to transfer to the City of London Academies Trust.
4. Andrew McMurtrie, Chair of the City of London Academies Trust Board of Trustees has been consulted and supports the reappointment of Dawn Elliott a Co-opted Trustee of the Board of Trustees.

Appendices

- None.

Kerry Nicholls

Committee and Member Services Officer, Town Clerk's Department

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Committee:	Date:
City of London Academies Trust Board of Trustees	9 July 2020
Subject: Policies for the Trust	Public
Report of: Chief Financial Officer	For Decision
Report author: Claire Hersey, CFO	

Summary

The Trust has a suite of key policies which should be reviewed regularly to ensure they remain appropriate for the Trust's current operations and provide consistency across the Trust where possible.

Recommendations

The Board of Trustees is asked to approve the following policies:

- Finance Policy;
- Procurement and Tendering Policy;
- Gifts and Hospitality Policy;
- Charging and Remissions Policy;
- Reserves Policy;
- Investment Policy;
- Expense Claim Policy (new);
- Whistleblowing Policy;
- Freedom of Information Policy;
- Data Protection Policy;
- Records Retention;
- Code of Conduct;
- No Smoking policy (new); and
- Policy for Supporting Pupils with Medical Conditions.

Main Report

Overview

The Trust has a suite of key policies which should be reviewed regularly to ensure they remain appropriate for the Trust's current operations and provide consistency across the Trust where possible.

The documents have been written with the aim of providing policies only (i.e. what should be done) at a Trust level so that processes and procedures (i.e. how it should be done) can be determined locally according to the needs, resources and structure in each of the individual academies.

Key finance policies

The key finance policies have been reviewed and updated and the updated policies, all attached as appendices to this paper, provide Trust-wide guidance and procedures to ensure consistency across all the academies. The updates are highlighted in the documents, but the changes are very minimal as the changes in the 2020 Academies Financial Handbook and the new Academies Accounts Direction do not have any significant impact on finance policies.

These seven finance policies will be reviewed in detail by the Trust Finance Audit and Risk Committee at its meeting on 1 July.

Other policies

The following policies have been reviewed and updated and the updated policies, attached as appendices to this paper, provide Trust-wide guidance and procedures to ensure consistency across all the academies. The updates are trivial:

- Whistleblowing Policy;
- Freedom of Information Policy;
- Data Protection Policy;
- Records Retention; and,
- Code of Conduct (last reviewed April 2017)

Also attached as appendices are:

- No Smoking Policy – while local policies exist in each academy a Trust-wide policy has been developed to ensure the policy requirements are consistent across all COLAT sites. In this policy 'smoking' includes vaping and e-cigarettes.
- Policy for Supporting Pupils with Medical Conditions (last reviewed April 2018) – this has been updated to reflect the latest guidance.

The Trust's Safeguarding Policy is also due for review by Trustees (last reviewed April 2018) and an updated policy will be presented to the Trust Board at its meeting in September 2020.

Appendices

- Finance Policy
- Procurement and Tendering Policy
- Gifts and Hospitality policy
- Charging and Remissions policy
- Reserves policy
- Investment policy
- Expense claim policy (new)
- Whistleblowing Policy
- Freedom of Information Policy
- Data Protection Policy
- Records Retention
- Code of Conduct
- No Smoking policy (new)
- Policy for Supporting Pupils with Medical Conditions

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FINANCE POLICY

Responsibility:	Chief Financial Officer
Updated:	July 2020
Approved by Board:	5 July 2017 Reviewed 18 July 2018 <u>Last</u> Reviewed 11 July 2019

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1. INTRODUCTION

- 1.1 The purpose of this policy is to ensure that the City of London Academies Trust (CoLAT or the Trust) 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 properly to meet the requirements of our funding agreements with the Department for Education (DfE).
- 1.2 The Trust must comply with the principles of financial control outlined in the academies guidance published by the DfE, most notably the current **Academies Financial Handbook**.
- 1.3 This policy should be read in conjunction with the following other Trust policies:
- a. Pay Policy
 - b. Investment policy
 - c. Reserves policy
 - d. Procurement and Tendering policy
 - e. Charging and remissions policy
 - f. Whistleblowing policy
 - g. Scheme of Delegation
 - [h. Gifts and Hospitality](#)
 - [h.i. Expense Claim Policy](#)

2. ORGANISATION, ROLES AND RESPONSIBILITIES

- 2.1 The Trustees have defined the responsibilities of each person involved in the administration of the Trust finances. These are laid out in the funding agreements between the Trust and the DfE, the Trust's Scheme of Delegation and the Terms of Reference of:
- the Board of Trustees;
 - the Local Governing Body of each Academy; and
 - the subcommittees within each Academy.
- 2.2 Members of the Trust Board, members of the Local Governing Bodies and subcommittees and Management across the Trust and each of the Academies will have regard to: -
- The current Education and Skills Funding Authority (ESFA) Academies Financial Handbook
 - Minimum standards of financial management as set out in the DfE/Master Funding Agreement^s
 - Advice and guidance relating to the financial performance of the Trust arising from the work of Ofsted, internal audit and external audit providers, and other interested parties.
- 2.3 The Trust believes that staff should be able to raise concerns properly, in confidence and without prejudice to their personal position. Where appropriate, this will include an opportunity to raise concerns outside the line management structure, in accordance with the Trust's **Whistleblowing Policy**.
- 2.4 The Chief Executive Officer of the Trust is the Trust's Accounting Officer as defined by the current Academies Financial Handbook and will fulfill the role and responsibilities as defined in the

Handbook.

- 2.5 The Chief Financial Officer (CFO) of the Trust is the Trust's Chief Financial Officer as defined by the current Academies Financial Handbook and will fulfill the role and responsibilities as defined in the Handbook.
- 2.6 Each Academy must have a designated Head of Finance who is responsible for the finance function within the Academy. This role will be fulfilled by the CFO for the central MAT team.

Separation of Duties

- 2.7 In order to reduce the risk of error or intentional manipulation, the roles and responsibilities of members of staff with finance responsibilities in each Academy and in the central MAT team will be structured to ensure the separation of those responsibilities or duties which would, if combined, enable one individual to record and process a complete transaction.
- 2.8 Wherever possible the following duties will be separated:-
- authorisation – of a transaction such as a purchase order or payment;
 - execution – the placing of an order, receiving of goods and services;
 - custody – the holding of goods and services;
 - recording – the completion of accounting records.

Staffing of the Finance Functions

- 2.9 The appointment of staff should be made with due regard to the qualifications and capabilities commensurate with their duties. Inevitably, the proper functioning of any system depends on the competence and integrity of those operating it. The qualifications, experience and personal qualities of those involved with financial arrangements are important features of an effective control system.
- 2.10 Consequently, each Academy and the central MAT team should establish procedures to ensure that: -
- Personnel are competent, suitably qualified and trained to perform at a level commensurate with their responsibilities;
 - Training needs and opportunities for staff, particularly for those with financial responsibilities, are reviewed on a regular basis;
 - Clear statements of criteria for personnel selection and formal job descriptions are maintained;
 - Finance staffing levels are adequate; and
 - There are effective arrangements in place to deal with the absence of key financial personnel to ensure the effective operation of the finance function and to ensure that financial control is maintained.

Human Resources and Payroll

- 2.11 Each Academy and the central MAT team will, where possible, allocate duties to ensure that an appropriate division of duties exists in the area of completing, checking and authorising of all documents and claims relating to appointment and termination of employment, employment

expenses and the processing and authorisation of the payroll.

- 2.12 Payroll transactions will be processed only through the approved payroll system. Payments for employment will not be made to staff or visiting lecturers etc. through any other mechanism. Each Academy and the Central MAT team must ensure it has procedures in place to meet the monthly payroll timetable and deadlines so that employees are paid accurately and on time, and the costs are recorded in the accounting system on a timely and accurate basis.
- 2.13 All salary payments are made by BACS.

3. BUDGET MANAGEMENT PROCEDURES

Accounting System

- 3.1 All financial transactions must be recorded in ~~each Academy's~~ the Trust's PS Financials Accounting System. This must include:
- System access
 - a. Entry to the system is password restricted and the Head of Finance must ensure a system is in place for passwords to be changed regularly.
 - b. Each user of the system must have only an appropriate level of access within the system as determined by the Head of Finance in the Academy in conjunction with the CFO.
 - Effective back-up procedures and a disaster recovery plan in place
 - Appropriate authorisation of all transactions, as determined by the Head of Finance in each Academy
 - Regular review of appropriate reports from the system to ensure accurate recording of transactions and to identify any irregular postings.
- Financial Planning Process**
- 3.2 Each Academy and the Central MAT team must produce a detailed budget for each academic year, along with budgets for at least the following 2 years, in accordance with the Trust's reporting timetable. The projections should include both revenue and capital funds, income from all sources and all planned expenditure. The budget should also show the planned use of any reserves brought forward. The format of the budget will be agreed between the CFO and the Academy's Head of Finance.
- 3.3 The budget must support the Academy's and the Trust's priorities for raising standards and attainment.
- 3.4 Each Academy's Improvement Plan for raising education outcomes, its curriculum and its budget need to be closely linked so that the Academy can weigh up whether it has enough funds to pay for the activities that it believes are necessary to achieve its education objectives. Also, it will be easier to show value for money if objectives within the plan have been achieved within the budgetary constraints.
- 3.5 The budget for each Academy and the Central MAT team must be approved in accordance with the Terms of Reference of the Local Governing Body and the Trust Board.

- 3.6 The consolidated Trust budget must be approved by the Trust Board and submitted to the ESFA in July each year in accordance with the ESFA's reporting timetable. The CFO and Heads of Finance in each of the Academies must work together to establish a timetable for local and central approvals of the budget so that the ESFA submission deadline can be met.

Budget Monitoring during the financial year

- 3.7 Each Academy will prepare a monthly budget monitoring report for review by its Local Governing Body or relevant subcommittee in accordance with the relevant Terms of Reference. The format and content of this report will be determined locally. The report must show a comparison of expenditure and income to the approved budget. Expenditure and income should be broken down into those sums actually spent, sums already committed and the amounts of expenditure and income which are planned but to which the Academy is not yet committed. The report should show, as accurately as possible, the forecast year end position. The report should also include relevant key financial performance indicators. These KPIs should be determined locally at the beginning of the financial year and reported each month.
- 3.8 Each Academy must also prepare a balance sheet and 12-month cash flow forecast each month for review by its Local Governing Body or relevant subcommittee in accordance with the relevant Terms of Reference. The format and content of this report will be determined locally.
- 3.9 Each Academy will also prepare and submit a monthly budget monitoring report, balance sheet and 12-month cash flow forecast to the Central MAT finance team. The form and content of these reports will be agreed between the CFO and the Academy's Head of Finance.
- 3.10 The central MAT team will prepare a Trust-wide budget monitoring report, balance sheet and 12-month cash flow forecast each month to be shared with the board of Trustees. The latest of these reports will also be submitted to each of the Trust's Finance, Audit and Risk Committee meetings during the financial year. The form and content of these reports will be agreed between the CFO and the Chair of Trustees. These reports should also include relevant key financial performance indicators. These KPIs should be determined by the Trustees at the beginning of the financial year and reported each month.
- 3.11 The consolidated Trust Budget Forecast Outturn Return (BFRO) must be approved by the Trust Board and submitted to the ESFA in May each year in accordance with the ESFA's reporting timetable. The CFO and Heads of Finance in each of the Academies must work together to establish a timetable for local and central approvals of the BFRO so that the ESFA submission deadline can be met.

Financial Review Meetings

- 3.12 Each year each Academy will be required to attend a Financial Scrutiny/Review Meeting. These meetings will involve the Headteacher/Principal, Chair of Local Governing Body/Finance subcommittee and Head of Finance of each Academy presenting key financial documents to the Chief Financial Officer, the Chief Executive and the Chair of CoLAT Finance, Audit and Risk Committee.
- 3.13 CoLAT audit takes place in October -November each year so it is important that the financial scrutiny check happens prior to the audit procedure and following the ESFA funding letter and budgeting process. For this reason it is proposed that this would happen in June/July each year.

3.14 The academy will be required to present an analysis of financial risk incorporating the following documentation:

- A projected budget out-turn for the current financial year
- A detailed 3-year budget forecast for the following three years with a summary of key assumptions
- A 12-month (Sept-Aug) cash flow forecast for the following financial year
- A breakdown of current reserves and a summary of the forecast reserves position over the next 3 years with an explanation of proposed use
- A 5-year capital plan summarizing key areas of spend and how funded
- The current risk register for the Academy
- A report on investments held and the performance of those investments
- A brief bench-marking report

Value Added Tax (VAT)

3.15 Under DfE regulations for Academies, VAT can be recovered on all expenditure, revenue and capital where VAT has been charged by the provider of the goods or service. Likewise, Academies must levy VAT on income if appropriate.

3.16 All transactions, expenditure and income, must be appropriately coded to the correct VAT rate when entered into the PS Financials accounting system. This is essential to ensure that Input VAT (expenditure) can be offset to Output VAT (income) on a monthly VAT report to be submitted to the HMRC.

3.16.17 Each month the central MAT team will prepare and submit a VAT return to HMRC via Making Tax Digital, ensuring the return is submitted in accordance with HMRC deadlines.

4. VALUE FOR MONEY, PURCHASING AND PAYMENTS

4.1 The Board of Trustees recognises the principles of Value for Money and aims to achieve best value for money from all its purchases.

4.2 The Head of Finance in each Academy and the Central MAT team must ensure that all purchases (revenue and capital) are made in accordance with:

- The current Academies Financial Handbook
- The Trust's Scheme of Delegation
- The Trust's Procurement and Tendering Policy
- The Terms of Reference of the Local Governing Body and its subcommittees
- Locally approved levels/limits of authority in place at the Academy (Appendix A)

4.3 The Register of Business Interests should be formally referred to prior to the acceptance of quotations or the awarding of contracts.

4.4 The procedures for revenue and capital purchasing (to include delegating budgets to budget holders, raising orders for goods and services, processing invoices and credit notes and payment of suppliers)

will be defined locally at each Academy ensuring appropriate levels of authority, required approvals and segregation of duties, and accurate recording of all transactions including accruals and commitments. In all cases where purchases are being made using funds of any sort, the expenditure must not include alcohol.

4.5 Any new goods or services purchased from a related party must be declared to the ESFA using the related party transactions online form. Prior approval must be sought from the ESFA when

- a single contract or agreement with a related party exceeds £20,000
- a contract or agreement of any value means the total value of contracts or agreements with the same related party exceeds £20,000 in a financial year

4.5 —

~~4.61.1 a single contract or agreement with a related party exceeds £20,000~~

~~4.74.6 a contract or agreement of any value means the total value of contracts or agreements with the same related party exceeds £20,000 in a financial year~~ **Prior approval must be sought from the ESFA for any contracts and other agreements with related parties that are novel, contentious and/or repercussive, regardless of value. Approval must be sought using ESFA's enquiry form, not through the related party on-line form.**

Goods and Services for Private Use

4.84.7 The Trust will avoid practices such as obtaining goods and services that may include an element of private use for Trustees, members of LGBs and subcommittees or staff. Trustees, members of LGBs and subcommittees and staff will also avoid accepting excessive hospitality, entertainment, or other services from existing or prospective suppliers.

5. INCOME AND SUNDRY DEBTORS

General Income Matters

- 5.1 The Head of Finance in each Academy and the Central MAT team is responsible for the correct accounting of all income due to, and cash collected by, the Academy. Where possible, the Head of Finance will ensure that the responsibility for determining sums due to the Academy is separated from the responsibility for collecting and banking such sums.
- 5.2 The procedures for managing income will be defined locally at each Academy ensuring appropriate levels of authority, required approvals and segregation of duties, and accurate recording of all transactions including debtors and accrued income.
- 5.3 Where invoices are to be raised, the Academy will do so promptly using authorised Academy invoices. The invoice will clearly detail the service or goods provided, the settlement date and the payment required.
- 5.4 Where cash is collected, whether it is due to a fund provided by the ESFA, fund raising or donations, or an unofficial fund, a receipt will be issued. In agreed circumstances such as when collecting monies for an activity for a group of pupils, Cash Collection listings will be used and a single receipt given for

the group income. The receipt books will be those approved by the Academy and include VAT, where appropriate.

- 5.5 Cash and cheques collected will be kept secure until the time of banking. Income collected will be banked in its entirety as promptly as possible and will not be used to cash personal cheques or for other payments (other than the official Petty Cash).
- 5.6 Sums received will be reconciled to the sums banked and to the accounting system to ensure that sums banked to the individual Academy and/or Trust bank account are attributed to the correct entity.

Debt monitoring and Debt recovery

- 5.7 All debts will be monitored at regular monthly intervals, via an “Aged Debtor report” in the [PS Financials](#) accounting system or an appropriate manual record. The procedures for managing and chasing debts will be defined locally at each Academy.

Bad Debt Write Off

- 5.8 All debts, regardless of age, should still be attempted to be collected, and will remain as a bad debt until it is written off.
- 5.9 Any write off of bad debts must be in accordance with:
- The current Academies Financial Handbook
 - The Trust’s Scheme of Delegation
 - The Terms of Reference of the Local Governing Body and its subcommittees
 - Locally approved levels/limits of authority in place at the Academy
- 5.10 Any debts written off must be reported to the Trust CFO.

6. BANKING ARRANGEMENTS

Opening of Bank accounts

- 6.1 The opening of all bank accounts must be authorised by the Trust Board on receipt of a summary of the arrangements covering the operation of the account and who the signatories will be.
- 6.2 The operation of systems such as Bankers AutoTruStic Clearing System (BACS) and other means of electronic transfer of funds should also be subject to the same level of control.
- 6.3 No bank account should become overdrawn since Academies are prohibited from borrowing in this way.
- 6.4 The procedures for managing and handling cash (to include processing and authorisation of BACS and cheque payments, management/checking of bank reconciliations, petty cash procedures and use of ‘cashless’ systems such as ParentPay) will be defined locally at each Academy ensuring appropriate levels of authority, required approvals and segregation of duties, adequate security of all cash, and

accurate recording of all transactions.

Payments and Withdrawals

- 6.5 There must be robust controls over all ways in which funds may be drawn from accounts, including such operations as standing orders, direct debit mandates, BACS payments and salary payments.
- 6.6 Mandates must be held by the Trust's bankers detailing the arrangements above together with clear instructions that the Trust's bank accounts must not become overdrawn.
- 6.7 The Controls must exist over electronic withdrawals and electronic transfer of funds, including BACS and direct banking links such as telephone banking or computer banking e.g. for payroll purposes or the investment of surplus funds or other transfers of funds between accounts.
- 6.8 Cancelled cheques should be defaced and retained.
- 6.9 If payments are to be made by BACS transfer, the Academy must ensure that the details of the receiving bank account are correct and that there are controls in place to guarantee the accuracy and authenticity of the transaction.

Reconciliation of Bank Accounts

- 6.10 At each Academy and in the Central MAT team, bank statements must be reviewed, thoroughly checked and formally reconciled to the accounting system at least monthly. The reconciliation report must be retained on file with each Bank Statement, and printouts of outstanding debits and credits should be attached to the reconciliations.
- 6.11 Un-presented cheques over 6 months old should be written off.

Cash flow forecasts

- 6.12 The Head of Finance in each Academy and the Central MAT team is responsible for reviewing the cash balances and preparing cash flow forecasts to ensure that there are sufficient funds available to pay for day to day operations. If significant balances can be foreseen, steps should be taken to invest the surplus funds. Similarly plans should be made to cover potential cash shortages.

7. SECURITY OF ASSETS

Letting of Trust Premises

- 7.1 The letting of Trust Premises and Grounds should always be subject to a formal contract, even when the Hirer or User is connected to the Trust. A detailed **Lettings Policy** together with charges should be approved locally at each Academy.

Insurance

- 7.2 The Trust will opt in to the Risk Protection Arrangement (RPA) for Academy Trusts with each Academy insuring any additional risks not covered by the RPA independently with a commercial insurer if

required.

- 7.3 The Head of Finance of each Academy will review the insurance needs of their Academy annually and liaise with the Central MAT team where appropriate to ensure that specific arrangements remain appropriate.
- 7.4 The Local Governing Body of each Academy will periodically consider whether to insure risks that are not covered by the RPA. The cost of premiums for any additional cover should be met from the Academy's delegated budget.
- 7.5 The Head of Finance of each Academy will be responsible for ensuring that the Local Governing Body are made aware of all new risks, and all incidents which may give rise to an insurance claim (e.g. accident, theft etc.).
- 7.6 Any potential or actual insurance claims should be reported immediately by an Academy to the insurers, their Local Governing Body and the Trust CFO.

Computer Systems

- 7.7 The Board of Trustees recognise the importance of protecting computerised financial management systems and the data held therein. The CFO will ensure that the Trust is registered in accordance with the Data Protection Act 2018.
- 7.8 The Head of Finance in each Academy and the Central MAT team will ensure that effective backup procedures are in place and that all back-up disks or tapes are stored securely.
- 7.9 Access to Trust and Academy management computer systems will be limited to authorised staff. These staff will use passwords which should not be disclosed and should be changed regularly. Only authorised software will be used to prevent the import of computer viruses. Staff will only have access to those modules appropriate to their duties.
- 7.10 Each Academy will have an appropriate IT user policy in place and agreements in place for both staff and pupils using the computer systems.

Security of Stocks and Other Property

- 7.11 The Head of Finance in each Academy is responsible for the care and custody of all assets within the Academy and will ensure procedures are in place for the maintenance and proper security for all buildings, vehicles, plant, stocks, stores, furniture, equipment, keys and cash.
- 7.12 The Head of Finance in each Academy will ensure that a register of assets / inventory is maintained in accordance with the provisions of the current Academies Financial Handbook. Inventories will be checked as appropriate and any discrepancy shall be investigated.
- 7.13 An inventory should: -
- form an important part of the Academy's procedures for ensuring that staff take responsibility for the safe custody of assets;
 - enable Academy management to undertake independent checks on the safe custody of assets,

as a deterrent against theft or misuse;

- help the Academy to manage the effective utilisation of its assets and to plan for their replacement;
- support insurance claims in the event of fire, theft or other losses.

7.14 The CFO will advise the Head of Finance in each Academy on the Asset Management reporting required by the ESFA, and the financial accounting of asset depreciation.

8. GENERAL

Register of Business Interests

8.1 The Board of Trustees, members of Local Governing Bodies and subcommittees and Trust staff all have a responsibility to avoid any conflict between their business and personal interests and affairs and interests of the Trust. A Register of Business Interests will be maintained for Board Members, Local Governing Bodies and subcommittees and staff with an influence over spending decisions.

8.2 Each register will include all business interests such as directorships, share-holdings and other appointments of influence within a business or other organisation, which may have dealings with the Trust. The disclosures should also include business interests of relatives and other individuals who may exert influence.

8.3 The Clerk to the Board, on behalf of the Board of Trustees must maintain a register of pecuniary / business interest forms for each member of the Board of Trustees and the CEO recording business interests. The register must be kept up to date with notification of changes and through a recommended annual review of entries. The Board of Trustees will ensure that all members of staff are aware of the responsibilities for declaring any links or personal interests which they have with regard to contractors and suppliers. The Head of Finance in each Academy will maintain, in a suitable form, a record of the details of those members of staff who declare any links or personal interests which they have with contractors and suppliers.

Gifts and Hospitality Register

8.4 The gift and receipt of gifts and hospitality is addressed in the Trust's Gifts and Hospitality policy.

8.5 A register will be maintained by the Head of Finance in each Academy to record all particulars of gifts and hospitality.

APPENDIX A - LOCAL LEVELS OF AUTHORITY FOR PURCHASING

[FOR DECISION AND APPROVAL BY LOCAL GOVERNING BODIES]

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PROCUREMENT AND TENDERING POLICY

Responsibility:	Chief Financial Officer
Updated:	July 20 17 ¹⁹
Approved by Board:	5 July 2017 Reviewed 1 8 ¹⁹ July 201 7 ⁹

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1 INTRODUCTION

This policy applies to the City of London Academies Trust ("the MAT", or "the Trust").

The Trust is required to comply with the current [Academies Financial Handbook](#), Funding Agreements with the Department for Education (DfE), any DfE guidance including academy procurement resources and the [Public Contracts Regulations 2006](#) (the Regulations). Under the Trust's Funding Agreements and as a registered charity, the board of trustees has specific obligations to ensure value for money.

It is important to note that the Trust is the sole legal entity which can enter into contracts for itself and any of its academies. The academies themselves are not separate legal entities and any contracts awarded by individual academies will be binding on the Trust. All spend is recorded by the Trust to comply with DfE audit requirements.

This policy should be read in conjunction with the following other Trust policies:

- Finance Policy
- Scheme of Delegation
- Gifts and Hospitality

2 BASIC PRINCIPLES

This policy applies to any contract for services or supplies which results in a payment being made by the Trust or an academy.

The basic principle is that procurement must deliver value for money to the Trust.

All bidders in a competition ("Bidders") should be treated in a way which ensures equality of treatment, non-discrimination and transparency.

All Bidders must be given the same information at the same time, and no Bidder should be treated more favorably than another;

There must be clear and transparent timescales, requirements, specifications and deadlines to comply with any competition.

Who can buy?

Although budgets are delegated to individual academies, not all employees of the Trust can buy for the Trust. The procedures for revenue and capital purchasing (to include delegating budgets to budget holders, raising orders for goods and services, processing invoices and credit notes and payment of suppliers) will be defined locally at each Academy ensuring appropriate levels of authority, required approvals and segregation of duties, and accurate recording of all transactions including accruals and commitments.

Exemptions to this document

This document must be followed in all but exceptional circumstances.

Some types of arrangements fall outside of the procurement rules, such as employment contracts. This may also include some types of Special Educational Needs provision, but this should be checked with the Trust Chief Financial Officer (CFO) for clarification as required.

Any exemptions should only be relied upon with express written consent from the CFO and the Trust Chief Executive Officer (CEO). The CFO should be consulted if there is any uncertainty about any procurement, and before any orders are placed or contracts signed on behalf of the Trust.

Actions before purchase

Whenever practical, for spends above £10,000, checks should be made with the other academies in the Trust to establish whether they have a need for a similar purchase. If so, then the 'spend' must be included within the same contract.

Consider how the purchase is going to be sourced. Can the Trust use an existing framework agreement (see below), or can another academy meet the requirement?

As set out below, wherever possible and if suitable, existing framework agreements (particularly for high value contracts) should be used, in preference to a new procurement exercise.

As a minimum requirement, you must have a written specification or requirement statement setting out clearly what you want to buy. This means establishing in advance what you want the goods, or services to deliver, together with the quantity, maximum cost and delivery / completion requirements.

Using existing framework arrangements

Wherever possible and in accordance with the current Academies Financial Handbook and DfE policy, the Trust should avoid running its own procurement processes, and instead use an existing framework arrangement.

From time to time the Trust may also set up its own framework agreements which can be used by all academies. Such frameworks will be notified to academies ~~from time to time~~.

Where can I find a framework?

Check with the following organisations to see if there is an existing contract /framework agreement for the goods or service you want to buy:

[Crown Commercial Service \(CCS\)](#)

[The Crescent Purchasing Consortium \(CPC\)](#)

[Pro5](#)

[ESPO](#)

[YPO](#)

There may also be other frameworks available which are suitable for academies. The CFO should be consulted before using a framework provided by an organization not listed above.

Registration with some of these organisations may be necessary, but this is a simple process. More information can be found on the DfE website:

In each case, it is important that:

- The Trust is entitled to call off from the arrangement. You should check in each case:
- The specification and the contract terms are suitable for your particular needs. The terms and conditions from frameworks are generally set in advance and cannot be changed beyond the mechanism set out in the framework

The framework's guidance must be followed, particularly about how orders should be placed. This will either generally permit (a) direct awards of contracts to a supplier and/or (b) mini competitions between all suppliers with capacity to deliver the requirement on the framework.

3 APPROVAL LIMITS

Different rules apply depending on the value of the purchase you want to make.

The Trust's current spend thresholds are set out below.

Value of spend (exclusive of VAT)	Which rules apply?	Tender Process Required for Academies	Tender process Required for Central MAT function
Up to £2,500	Low Value	Best Value principles applied	
£2,501 to £5,000	Low Value	Minimum 2 written quotations	
£5,001 to £10,000	Low Value	Minimum 3 written quotations	
£10,001 to £50,000	Medium Value	Business Case with minimum 3 written quotations. Approval process determined by Terms of reference of Local Governing Body and its subcommittees	Business Case with minimum 3 written quotations. Approved by CEO.
£50,001 to £100,000	High Value	Formal tender process. Approval process determined by Terms of reference of Local Governing Body and its subcommittees.	Formal tender process led by CFO. Recommendation presented to MAT Board of Trustees for approval of spend.
Over £100,000 up to OJEU thresholds	High Value	Formal tender process approved by Local Governing Body with additional approval from MAT Board of Trustees.	Formal tender process led by CFO. Recommendation presented to MAT Board of Trustees for approval of spend.
Over OJEU threshold	Full OJEU tender process with recommendation presented to MAT Board of Trustees for approval of spend.		

It is important that contracts are properly assessed for value. In particular, you must not deliberately divide one contract into smaller contracts with the effect of avoiding the procurement rules.

The contract value is based on the total value of the 'spend' over the life of the contract which is the subject of the procurement. The requirements of all academies should be combined into one procurement if they are the same or similar.

If you do not know what your exact spend is going to be over the life of the contract, you must take an average annual spend and multiply by the estimated duration of the contract.

The estimated duration of the contract must include any extensions or options to renew.

Low Value transactions (up to £2,500)

For all transactions of a similar type with a total value of up to and including £2,500 exclusive of VAT, competitive quotes are not needed and the best value approach should be taken.

Academies must follow their own purchasing rules, and comply with their own budget delegation and segregation of duties requirements.

Low Value transactions £2,501-£5,000

For transactions between £2,501 and £5,000 for Goods and Services at least 2 written quotations should be obtained; the Head of Finance in the Academy will then compare prices and options. A Best Value Form should be completed.

Low Value transactions £5,001-£10,000

For transactions between £5,001 and £10,000 for Goods and Services, at least 3 written quotations should be obtained; the Head of Finance will then compare prices and options. A Best Value Form should be completed

Medium Value transactions from £10,001 up to £50,000

For medium value transactions, a business case and three written quotes must be submitted for the purchase approval.

The business case must include as minimum:

- Detailed Specification of Requirements;
- Benefits to the organisation and best value for money;
- Reason for the choice of preferred supplier; and
- The outcome of the evaluation process.

For Low and Medium Value transactions an Academy may seek approval for a contract or purchase with a lower number of quotes/tenders than specified in the policy in the following circumstances:

- a) where it has not been practicable to obtain the required number of quotations, e.g. because one or more suppliers have refused to quote
- b) where specialist expertise or products are required and are only available from a very limited number of suppliers
- c) works, supplies or services are urgently needed for the immediate protection of property or to maintain the immediate functioning of the school
- d) a funding/grant provider has specifically stipulated that a particular supplier be used for the

procurement of goods and services to complete the project.

However, in instances a, b or c for Medium Value transactions a minimum of two written quotes/tenders must still be obtained. In ALL four circumstances, the reasons for seeking approval with a lower number of quotes/tenders must be fully documented as part of the approval process.

High Value transactions £50,001 to OJEU Thresholds

High value transactions will be subject to a business case and formal tender process as described below.

4 FORMAL TENDER PROCESS

FORMS OF TENDER

There are four forms of tender procedure and the circumstances in which each procedure should be used are described below.

Open Tender: This is where all potential suppliers are invited to tender. The budget holder must discuss and agree with the Head of Finance how best to advertise for suppliers e.g. general press, trade journals or to identify all potential suppliers and contact directly if practical.

This is the preferred method of tendering, as it is most conducive to competition and the propriety of public funds.

Restricted Tender: This is where suppliers are specifically invited to tender. Restricted tenders are appropriate where:

- there is a need to maintain a balance between the contract value and administrative costs
- a large number of suppliers would come forward or because the nature of the goods are such that only specific suppliers can be expected to supply the Trust's or Academy's requirements
- the costs of publicity and advertising are likely to outweigh the potential benefits of open tendering

Competitive Dialogue Process is an exceptional procedure and should only be used where the contracting authority wishes to award a particularly complex contract. A particularly complex contract means a contract where the contracting authority is not objectively able to:-

- define 'the technical means' in terms of a British, European or international standards or technical specifications; and/or in relation to the performance or functional requirements ; or
- specify the legal and/or financial make-up of a project.

Negotiated Tender: The terms of the contract may be negotiated with one or more chosen suppliers. This is appropriate in specific circumstances:

- the above methods have resulted in either no or unacceptable tenders
- only one or very few suppliers are available
- extreme urgency exists
- continuation with the existing supplier is justified

PREPARATION FOR TENDER

Prior to embarking on a procurement exercise, consideration should be given to the criteria by which tenders will be assessed. These may include financial aspects (ensuring full costs are considered),

technical performance, supplier reputation, experience and other value added aspects. Each of the criteria can be weighted appropriately in the light of the importance attached to those particular aspects.

Full consideration should be given to:

- objective of project
- overall requirements
- Best value for money
- Benefits to the academy (financial/non-financial)
- Detailed specification of the requirement
- Technical skills required
- Market testing
- After sales service requirements
- Form of contract.

It may be useful after all requirements have been established to rank requirements (e.g. mandatory, desirable and additional) and award marks to suppliers on fulfilment of these requirements to help reach an overall decision.

INVITATION TO TENDER

If a restricted tender is to be used then an invitation to tender must be issued. If an open tender is used an invitation to tender may be issued in response to an initial enquiry.

An invitation to tender should include the following:

- introduction/background to the project
- scope and objectives of the project
- technical requirements
- implementation of the project
- terms and conditions of tender
- form of response

Bidders requesting more information must be sent a tender pack. This should contain a covering letter outlining the tendering process and instructions, the requirement and needs, together with any additional information required from the bidders. This will need to be bespoke in each case but could include, for example:

- details of pricing;
- details of method statements;
- details of product characteristics;
- the evaluation criteria which will be used to evaluate the tenders received, including disclosure of the criteria, sub criteria and weightings that will be applied to select the best Bidder(s); and
- a draft set of contract terms and conditions.

TENDER ACCEPTANCE PROCEDURES

The invitation to tender should state the date and time by which the completed tender document should be received by the Academy/Trust. Tenders should be submitted in plain envelopes clearly marked to indicate they contain tender documents. Envelopes should be time and date stamped on receipt and stored in a secure place prior to tender opening. Tenders may be provided in hard

copy, ~~on CD-ROM~~ or via email. In the case of hard copies ~~and CD-ROMs~~, they must bear no external markings to identify the tenderer. In the case of email, tenders should be sent to a separate email address (e.g. procurement@cola.org.uk) which cannot be accessed by those who will be evaluating the tender. After the submission deadline all tenders must be circulated to the assessors at the same time.

Tenders received after the submission deadline can be declined.

TENDER OPENING PROCEDURES

All tenders submitted should be opened at the same time and the tender details should be recorded. Two persons should ideally be present for the opening of hard-copy tenders and should include the Head of Finance.

A separate record should be established to record the names of the firms submitting tenders and the amount tendered. This record must be signed by the people present at the tender opening.

TENDER EVALUATION AND DECISION

When evaluating tenders consideration should be given to:

Cost - Care should be taken to ensure that competing suppliers have quoted for the same service. Where discrepancies arise, suppliers should be contacted to amend their quotes where necessary to ensure a fair comparison between suppliers. There may be scope for negotiation on cost if a particular supplier is preferred for quality/suitability reasons, but is not the cheapest.

Quality/Suitability - Due regard should be given to the qualifications and experience of the contractor, and the quality and suitability of the goods/services offered. Where necessary, references should be sought from other customers.

The evaluation process should involve at least two people. Those involved should disclose all interests, business and otherwise, that might impact upon their objectivity. If there is a potential conflict of interest then that person must withdraw from the tendering process.

Those involved in making a decision must take care not to accept gifts or hospitality from potential suppliers that could compromise or be seen to compromise their independence.

Full records should be kept of all criteria used for evaluation, and a one page summary report prepared for approval by the relevant party, summarising the options and giving a recommendation.

Where required by the conditions attached to a specific grant from the DfE, the department's approval must be obtained before the acceptance of a tender.

The accepted tender should be the one that is most economically advantageous.

AUDIT TRAIL

A clear audit trail must be kept for all purchases. The level of detail required will increase with the value of the procurement. The written record must include:

- who was responsible for making the decision to procure, and details of their decision making process;
- full minutes of any meetings at which the procurement was discussed;

- who was responsible for evaluation of tenders, and details of the evaluation, if applicable;
- who was responsible for receiving and checking the goods or services and for authorising and making payment;
- details of the purchase itself, for example, what was purchased, from whom and for what price; and
- be available to the Accounting Officer at all times for audit purposes as required.

In each case, the written record must include copies of all original documentation used during the procurement such as tender packs, quotations, contracts and invoices.

TENDERING FOR MAJOR CONTRACTS VIA THE OFFICIAL JOURNAL OF THE EUROPEAN UNION (OJEU)

In rare circumstances the Trust or an individual Academy may tender for supplies where the value exceeds the EU procurement threshold. For tenders above this threshold, the Trust would be required to either tender for the work via an EU compliant purchasing consortium, or by inviting tenders on the OJEU website. In both cases the principals above remain, but when advertising directly with OJEU, there are certain additional procedures which need to be followed.

The Trust must first register as a buyer on the OJEU website. A tender specification can then be uploaded, giving a minimum time of 52 days in which to respond. Once all tenders have been received and evaluated, and a decision made at by the Trust, a “decision notice” or “standstill letter” must be issued to all candidates, giving the following information:

- the award criteria used
- reasons for the decision including the characteristics and relative advantages of the successful tender
- the scores obtained by the recipient of the letter and the successful contractor
- a statement of when the standstill period is to end. If the letter is sent by electronic means, this period will be 10 days

Once the standstill period has ended, the contract can be awarded officially. A contract award notice must be issued in the OJEU within 48 days of the award of the contract.

APPENDIX 1 – BEST VALUE FORM FOR LOW VALUE COSTS

Detailed overview of goods and/or services required			
Existing Alternatives within the Trust			
Why needed and benefits to the Trust			
Anticipated cost			
Summary of quotes received	1	2	3
Supplier			
Cost			
Comments			
Reason for choice if not cheapest (include separate page if required)			
Prepared by:	Signed:	Date:	
Approved by:	Signed:	Date:	
Approved by:	Signed:	Date:	

Please attach copies of all quotes

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GIFTS AND HOSPITALITY POLICY

Responsibility:	Chief Financial Officer
Updated:	July 2020
Approved by Board:	5 July 2017 Last reviewed 11 July 2019

This Gifts and Hospitality Policy is intended to assist all relevant persons in following the various Academy guidance and relevant legislation on the giving and receipt of hospitality or gifts

The policy covers both the receipt and delivery of hospitality and gifts to:

- Employees of the Trust
- Trustees
- Members of the Local Governing Bodies (LGBs) or subcommittees of any of the Academies in the Trust

The term 'gifts' is deemed to include:

- Goods provided for personal or other private use
- Personal services
- Loans of equipment, vehicles etc for personal use
- The provision of goods and/or services at preferential cost (including loans of money) for personal or other private use.

The term 'hospitality' is deemed to include the offer or receipt of:

- Food and drink
- Travel
- Accommodation
- Entertainment

Legal Framework & National Guidance

Prevention of Corruption in the Public Sector

Under the Prevention of Corruption Acts, 1906 and 1916, it is an offence for employees corruptly to accept any gifts or consideration as an inducement or reward for,

- Doing, or refraining from doing, anything in their official capacity or
- Showing favour or disfavour to any person in their official capacity

Under the 1916 Act, any money, gift or consideration received by an employee in public service from a person or organisation holding or seeking to obtain a contract will be deemed to have been received corruptly unless the employee proves to the contrary.

General Principles

The City of London Academies Trust is responsible for ensuring the guidelines are brought to the attention of all employees, trustees and members of LGBs, and that a framework is put in place to ensure they are effectively implemented.

It is the responsibility of staff, trustees and members of LGBs and subcommittees to ensure that they are not placed in a position which risks, or appears to risk, conflict between their private interests and their duties at the Trust or any individual Academy. This applies to both those who commit resources directly (e.g. the ordering of goods or services), or indirectly (e.g. by policy development).

Each employee, trustee and member of a LGB or subcommittee has a personal responsibility to declare hospitality and gifts in accordance with the policy. Non-compliance with the policy by a member of staff may lead to action under the Disciplinary or other relevant policy. Staff also need to

be aware that a breach of the provisions under legislation may make them liable to prosecution and may also lead to loss of employment and pension rights.

Any hospitality or trivial gifts accepted should be entered on a Gifts and Hospitality Register maintained by the Head of Finance in the relevant Academy.

Receipt of Hospitality

General Principles

Gifts, hospitality or benefits of any kind from a third party perceived as compromising personal judgement or integrity should not be accepted. Employees, trustees and members of LGBs or subcommittees must ensure that they do not use their official position to further their private interests or those of others. In relation to this, all forms of private interests in relation to the Trust or any Academy must be declared. Purchasing decisions and contract negotiations must be based solely on achieving the best value for money for the tax payer.

Any hospitality accepted of a value exceeding £10 should be recorded on the Gifts and Hospitality Register.

Exceptional Cases

It is recognised that there are exceptional cases where refusal of a gift will clearly offend a donor, cause embarrassment or appear discourteous. In these cases, the donor should be advised that the permission of the Trust or Academy management will have to be sought as to whether or not the gift can be accepted. Decisions will then be taken by the Trust or Academy management on whether to

- allow the recipient to accept the gift; or
- return the gift to the donor with a suitably worded letter explaining why the gift cannot be accepted; or
- use or dispose of it, if possible, in or by the Trust or the Academy.

Provision of Hospitality

The provision of hospitality by employees, trustees or members of LGBs or subcommittees to representatives of other organisations should be modest and appropriate in the circumstances.

Provision of hospitality by the Trust or any Academy to employees or others would not normally be appropriate except in the case of working lunches in the course of meetings, training courses or workshops.

The use of Trust monies for hospitality and entertainment at conferences and seminars should be carefully considered. The Trust and each Academy needs to be able to demonstrate good value in incurring public expenditure.

In all cases where hospitality is provided, the hospitality must not include alcohol.

Note that where individuals have accepted hospitality from another organisation, for example, in order to fulfil a speaking engagement this should be of a value equivalent to that normally provided by the Trust, and there is no further entitlement to claim expenses from the Trust or any Academy.

Hospitality and meetings

Hospitality must be secondary to the purpose of the meeting and the level must be appropriate and in proportion to the event. The costs involved must not exceed the level which the recipients would normally adopt when paying for themselves at such an event or that which could be reciprocated by the Trust or an Academy.

Business - gifts

Acceptance of gifts

Employees, trustees and members of LGBs or subcommittees should not accept gifts which may be, or are capable of being, construed as influencing a purchasing decision or casting doubt on the integrity of such decisions.

Personal gifts offered by parents and students to members of staff, for example, at holiday or end of term times, should be recorded on the Gifts and Hospitality Register if the estimated value is in excess of £10.

In certain instances, for example, where a class contributes collectively, gifts greater than a value of £10 up to a maximum value of £250 may be accepted but must be recorded on the Gifts and Hospitality Register.

Commercial or corporate business gifts and donations made to the Trust or any individual Academy, other than items of very small intrinsic value, should be reported separately to the Head of Finance at the Academy.

Presents and donations to an Academy or a Department therein should be reported and added to the register.

All gifts (other than items of very small intrinsic value) or hospitality received shall be acknowledged in writing and a copy of that acknowledgement shall be held on file by the Head of Finance at the Academy.

Giving of gifts

Charitable donations should not be given by any member of staff, trustee, LGB member of subcommittee member, on behalf of the Trust or any individual Academy. Alcohol should not be given by any member of staff, trustee, LGB member of subcommittee member, on behalf of the Trust or any individual Academy.

Monetary gifts

The acceptance or giving of cash is not acceptable in any circumstances.

Records of Hospitality and Gifts

All gifts and hospitality must be recorded on the Gifts and Hospitality Register held by the Head of Finance in each Academy. When in doubt employees, trustees and members of LGBs or subcommittees are advised to record any matters concerning gifts and hospitality which may be covered by this policy to ensure that an individual does not expose themselves to risk.

The information required for the hospitality and gifts register is set out below

- date of entry

- name of recipient / provider
- job title
- nature and purpose of hospitality or gift received or provided
- action taken, accepted/refused /returned
- estimated value

Submissions should be made as soon as is practically possible.

The Hospitality register will be available to the External Auditors.

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City of London Academies Trust
Charging and Remissions Policy



APPENDIX 4

Aims:	<ul style="list-style-type: none"> To provide free education for all pupils/students in compliance with the relevant regulatory requirements To supplement the core teaching activity with a broad variety of learning experiences To provide the basis for requesting a fair level of charges where appropriate to cover the costs of specific activities or trips/visits To ensure that all pupils/students are given the opportunity to benefit from such learning experiences and are not restricted on financial grounds <p><i>This will be achieved by:</i></p> <ul style="list-style-type: none"> Providing access to a broad and rich learning experience for all pupils/students regardless of their family financial circumstances Utilising appropriate parental/carers contributions received to maximise the range of learning experiences on offer to the pupils/students Providing a clear and transparent system for seeking contributions from parents/carers
Targets/ Outcomes	<ul style="list-style-type: none"> To receive a contribution towards the cost of providing non-core activities where appropriate from those families who are able Information on regular specific activities and charges will be made available to parents/carers. Parents/carers will be advised of charges for ad hoc trips and visits as they occur Parents/carers who receive income support will be eligible for exemption from charges where reasonable, as determined by the Principal/Headteacher Parents/carers are not obliged to contribute to specific activities, but should be aware that on occasions, such events may have to be cancelled if they are not financially viable The basis for any charges levied will be clear and transparent The Trust will not seek to generate a profit from such learning related activities
Definition:	<ul style="list-style-type: none"> Charging and Remissions is the process whereby the Trust and each individual Academy states the way in which it will deal with the cost of providing supplemental learning activities which fall outside of the core legal requirement
Roles and Responsibilities:	
Pupils/students will:	<ul style="list-style-type: none"> Be encouraged to participate in a variety of realistic additional learning experiences, irrespective of their families' ability to meet the financial cost
All staff will:	<ul style="list-style-type: none"> Actively seek to provide and support a range of realistic additional learning experiences to all their pupils/students Communicate the contribution required to participate in such programmes and manage the collection of parental/carers contributions Deal sensitively with parents/carers who may not wish to pay or be able to pay for trips or activities Based upon the level of charges and remissions, determine whether the activity in question is able to proceed
Parents and carers will:	<ul style="list-style-type: none"> Be aware of and adhere to the statement of standard charges that is provided to them Inform the Academy promptly if they are unable or do not wish to contribute to a trip or event. In the case of family hardship, parents/carers may apply in confidence to the Principal/Headteacher for exemption Support the Trust and individual Academy in looking to provide an appropriate level of experiences for their children, understanding that some events must be financially viable
The SLT in each Academy will:	<ul style="list-style-type: none"> Consider cases of family hardship Implement, monitor and review the policy with governors
Related Docs	For each individual Academy: Family-Academy Agreement, Statement of charges, Charging and remission procedures

Responsibility	Approved by Board:	Last review	Review By:
CFO	5 July 2017	11 July 2019	Staff, Parents/Carers, Governors

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RESERVES POLICY

Responsibility:	Chief Financial Officer
Approved by Board:	11 July 2019

Background

Maintaining an appropriate level of financial reserves is considered essential in protecting the Trust and each individual academy from financial risk generated by, for example;

- income reduction due to Government funding changes
- unexpected falls in pupil/student numbers
- cash flow issues due to delays in receipt of funding
- emergencies

In general it is considered prudent to maintain a level of useable reserves sufficient to cover unexpected and unplanned events. At the same time, the Trust wishes to ensure that funding is used actively to benefit the pupils/students in each of the academies and so use available reserves to enhance educational provision.

Reserves of the whole multi-academy trust

Each year the Trustees will review the reserve levels of each Academy and the Trust as a whole during the reporting period and in the annual audited financial statements to ensure that a prudent level of reserves is maintained. This review will encompass the nature of income and expenditure streams, the need to match income with commitments, and the nature of reserves and will take in to account:

- two month's salary bill
- each Academy's annual budget
- the need for any large project spend such as facilities development or building condition needs
- any uncertainty, turbulence or expected reduction in funding arrangements
- anticipated funding over the next three years.

The Trustees have determined that the appropriate level of desired free reserves for the whole Trust should be equivalent to two month's operational expenditure (excluding the fixed assets fund) where possible, with the Trust aiming for a minimum required level equivalent to one month's operational expenditure. The reason for this is to provide sufficient working capital to cover delays between spending and receipt of grants.

Reserves of each individual academy

Each year the Local Governing Body in each Academy will review the reserve levels of the Academy during the reporting period to ensure that a prudent level of reserves is maintained. This review will encompass the nature of income and expenditure streams, the need to match income with commitments and the nature of reserves and will take in to account:

- two month's salary bill
- the Academy's annual budget
- the need for any large project spend such as facilities development or building condition needs
- any uncertainty, turbulence or expected reduction in funding arrangements

- anticipated funding over the next three years.

The Trustees have determined that the appropriate level of desired free reserves for each individual academy should be equivalent to two month's operational expenditure (excluding the fixed assets fund) where possible, with each academy aiming for a minimum required level equivalent to one month's operational expenditure as described above.

Use of reserves

Each academy will retain its own surplus or deficit generated each financial year and the allocation and use of reserves held by each academy will be for its local governing body to determine, subject to:

- The requirements of the Trust's Finance Policy and Procurement and Tendering Policy;
- Exceptional needs of other academies within the Trust;
- The Trust Scheme of Delegation; and
- Approval of the whole Trust budget and Trust annual audited financial statements by the Board of Trustees.

Exceptional needs of other academies within the Trust

In exceptional circumstances the Trustees may approve the transfer of reserves and/or cash balances from one academy to another to meet operational or capital requirements. Any transfer will be subject to the submission of a full business case to the Board of Trustees for formal approval to include:

- Value of reserves and/or cash to be transferred to another academy
- Details of why a transfer is required and why the issues were not reasonably anticipated and managed by the academy in need
- If the transfer is to support an academy in deficit; a deficit recovery plan illustrating how the academy will re-establish a surplus position, with a timescale, and how the reserves/cash will be repaid to the donor academy
- Confirmation that the transfer will not create operational difficulties for the donor academy.

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CITY OF LONDON ACADEMIES TRUST

INVESTMENT POLICY

Responsibility:	Chief Financial Officer
Updated:	July 20 17 ¹⁹
Approved by Board:	5 July 2017 Reviewed 1 1 ¹⁸ July 201 7 ⁹

Purpose and scope

The purpose of this Investment Policy is to set out the processes by which the Trustees will meet their duties under the Trust's Articles of Association and current Academies Financial Handbook issued by the ESFA to invest monies surplus to operational requirements in furtherance of the Trust's charitable aims and to ensure that investment risk is properly and prudently managed.

Objectives

The investment objectives are:

- to achieve best financial return available whilst ensuring that security of deposits takes precedence over revenue maximisation.
- To only invest funds surplus to operational need based on all financial commitments being met without any of the Trust's bank accounts becoming overdrawn.
- By complying with this policy, all investment decisions should be exercised with care and skill and consequently be in the best interests of the Trust, commanding broad public support.

Investment strategy

Each academy will make its own investment decisions in accordance with:

- The Trust Scheme of Delegation
- The requirements of this Investment Policy
- The Trust Finance Policy and Procurement and Tendering Policy
- The terms of reference of the Academy's Local Governing Body and its subcommittees

Investment risk will be managed through asset class selection and diversification to ensure that security of deposits takes precedence over revenue maximisation. The Trust's policy is to invest funds in risk-free and immediately accessible deposit accounts with the Trust's banking provider. If sufficient reserves are available an Academy may seek to invest in other low-risk accounts subject to approval by the Trust's Finance, Audit and Risk Committee. Investments for a fixed term should not normally exceed one year in order to provide flexibility for the following year's plans, unless a clear rationale is provided for exceeding one year to the benefit of the Academy and the Trust.

Decisions on how much to invest and how long to invest for will be based on operational requirements, demonstrated by cash flow forecasts produced by the Academy's Head of Finance. Each Academy should aim to have a balance in its current account to be at least sufficient to meet two months' worth of expenditure and a sufficient balance must be held in the current account so that the Academy's financial commitments can always be met without the bank account going overdrawn. The size of the balance will be determined by a forecast of future need and kept under review.

The Head of Finance will periodically (at least annually) review interest rates and compare with other investment opportunities to determine whether it is appropriate to invest funds with other providers for specified periods up to 12 months

Monitoring and review

The Head of Finance will monitor the Academy's cash position and cash flow forecast and report investments held and the performance of investments against objectives to the Local Governing Body (or relevant subcommittee) at appropriate intervals, depending on the terms of the investments. For example, if investments are held one year then an annual report is appropriate. A report on investments held and investment performance will also form part of the annual Financial Review/Scrutiny Meetings for each Academy.

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**CITY OF LONDON
ACADEMIES TRUST**

Expenses, Travel and Subsistence Policy

Responsibility:	Chief Financial Officer
Approved by Board:	
Next Review Date:	

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1 Introduction

- 1.1 This document provides detailed guidance on COLAT's policy for the reimbursement of expenses necessarily incurred by employees in the performance of their duties. It is designed to assist staff in identifying what COLAT will reimburse and to guide staff through the policy for reclaiming expenses.
- 1.2 Implicit throughout this document is the obligation that staff will obtain value for money when incurring expenditure on behalf of COLAT.
- 1.3 This policy applies to all employees of COLAT, included those seconded through a Service Level Agreement and all funds held by COLAT from whatever source.
- 1.4 Claims for reimbursement should be made as soon as possible and, in any case, not later than two months after the expenditure has been incurred. Claims older than two months will **not** be paid unless exceptional circumstances apply. The claim, together with an explanation for the delay should be submitted to the Academy's Head of Finance who will consider each case on its merits.
- 1.5 Employees should neither gain nor lose financially in relation to expenditure and reimbursement on business travel and other expenses arrangements.

2 Travel expenses

- 2.1 All employees must adhere to this policy when incurring travel and associated expenditure on behalf of COLAT. A business journey is one necessarily undertaken by an employee to carry out her or his duties for COLAT, or to attend training courses or conferences necessary for the performance of those duties.
- 2.2 Employees will be reimbursed for actual travel and associated expenses incurred wholly, exclusively, solely and necessarily in the performance of their duties. Expenditure should be kept to the minimum consistent with the effective performance of work on behalf of COLAT.
- 2.3 Wherever possible, and subject to business needs, reservations should be made in time to take advantage of cheaper fares, accommodation or "early bird discounts" etc.
- 2.6 Employees should travel and be accommodated in safety and reasonable comfort. However, the mode of travel should be the most cost-effective consistent with the business needs of COLAT. For instance, the use of public transport rather than a taxi.
- 2.8 Any expenses incurred traveling from your home to your normal place of work cannot be claimed.

Travel from your home to a different place of work or to attend a meeting, training course of conference can only be claimed if the cost exceeds the cost of your routine journey from home to your normal place of work, and only the difference can be claimed.

2.9 All public transport must be standard class.

2.10 Promotional Incentives

The purchasing decision shall not be influenced by any promotional incentives such as airline mileage credits or personal cash credit card discounts or rebates. Employees should not benefit personally from these incentives but should use them to offset the cost of the current or future business journeys.

2.11 Partner's Expenses

Partners shall not travel at COLAT's expense except when their presence is required and authorised for a bona fide business purpose. In all cases the Chief Executive Officer must give authorisation in advance.

A partner may accompany a member of staff for personal reasons. In such instances COLAT must not be charged for more than if the member of staff had travelled alone. Wherever possible the partner's travel costs should be invoiced separately and paid privately. If the invoice includes both private and official travel costs the member of staff should settle the total invoice and reclaim the official element from COLAT. Private insurance must be taken out to cover the partner's travel

2.12 Holidays Linked to Business Trips

An employee shall not claim any additional travel costs, subsistence or other expenses for days taken as holiday linked to a business trip. Private insurance must be taken out to cover the private part of the journey.

2.13 Claims to be for Actual Expenditure

With the exception of mileage, reimbursement will normally only be made where claims are supported by original fully itemised valid receipts. Credit card transaction slips are not accepted as receipts. COLAT accepts, however, that it may not always be possible to obtain receipts for certain expenses – e.g. underground travel or using parking meters. Providing full details of the journey are given and the reason for the journey is specified, reimbursement will be made. When travelling in countries where receipts are not issued, staff should make every attempt to get some form of documentation. Where it is not possible, so long as full details of the expenditure are given, reimbursement will be made.

2.14 Where an advance payment had been made, the claim must be submitted within two weeks of completion of the journey.

2.15 Advance Travel Authorisation

Written authorisation by the budget holder and notification to the Academy's Head of Finance for insurance purposes is required in advance for all international travel.

2.16 Travel Bookings

All travel bookings in excess of £10 must be supported by a Purchase Order

All travel bookings in excess of £50 must be made in consultation with the Academy's finance team to enable COLAT to obtain the most favourable service and terms available (and therefore demonstrate overall value for money), to ensure a complete audit trail, and to enable COLAT to pay directly (thus avoiding a staff expense claim). If, however, staff are able to demonstrate that better value for money can be achieved by purchasing rail tickets directly via an internet booking site, reimbursement will be made to the member of staff. Individuals will be required to keep a record of this justification and may be contacted by a member of the Finance team to provide this information.

Exceptionally, where a member of staff can demonstrate to the Head of Finance that travel expenditure to a specific destination through an online internet purchase, for example, EasyJet or Ryanair, is cheaper, reimbursement will be made to the member of staff on receipt of a certified claim for payment.

Where staff undertake domestic journeys by public transport, staff can book directly, when the cost of the journey is less than £50. Staff should book in advance where possible to ensure the cheapest deal.

2.17 Travel Costs – Advance Payments

In exceptional circumstances advance payments against expenses can be requested. Whenever possible, arrangements should be made for the payment of fares, car hire, hotel expenses, etc. in advance, thus leaving the minimum amount to be met during the business trip. The amount of the advance must be agreed with the CFO. In all cases where an advance has been given an Expenses Claim Form, showing the amount of the advance in the appropriate place, must be submitted within two weeks of completing the business trip.

Any unspent cash advanced is to be returned to COLAT, either in cash or by a personal cheque made payable to COLAT, securely attached to the authorised Expenses Claim Form within two weeks of the completion of the trip. Cash must not be sent through the internal post but must be delivered by hand to a finance officer who will issue a receipt.

2.18 Motor vehicles

COLAT strongly supports use of public transport over private motor vehicles and taxis. Motor Vehicles or taxis should only be used under the following conditions:

- Where two or more COLAT people travel together, so that the combined cost of their journey by public transport would exceed that calculated using the mileage rates.
- Where the traveller is disabled or is assisting a disabled person.
- Where bulky equipment is being carried.
- Where the destination is not accessible or requires an excessively long or arduous journey by public transport.
- Where other than for the reasons above it can be shown to be cost effective.

If a member of staff judges it more convenient because of shorter journey time etc. by car or taxi reimbursement will be restricted to the amount that it would have cost on public transport. Claimants must include evidence of the cost of public transport with any such claim.

2.19 Private Vehicle Insurance

COLAT's motor policy does not provide cover for employees driving their own vehicles on COLAT business. Where an employee uses his or her own car or motorcycle, he/she must ensure that the vehicle insurance policy includes cover for business use. Your insurer should provide this additional cover without difficulty.

2.20 Roadworthiness

Where employees use their own vehicles on COLAT business, it is a requirement that the vehicle is serviced to the manufacturer's specification by an approved garage and that where necessary a relevant MOT certificate is in force.

2.21 Mileage

Mileage can only be claimed when it is incurred wholly, exclusively and necessarily for work purposes e.g. driving between academies, to meetings, to training. Mileage undertaken from home to work **must not** be claimed unless the claimant's home is their normal place of work. Claims for purchases of fuel must not be made.

All claims for reimbursement of mileage must specify the following:

- Details of and reasons for the journey undertaken.
- The start and finish points of each journey and the places visited on the way, if any.
- The dates of travel.

Where unusual circumstances occur that result in a higher than expected mileage being incurred, an explanation must be provided.

2.22 Car Parking

COLAT will reimburse all expenses for car parking costs incurred whilst travelling on COLAT business away from the employee's normal place of work. Claims should be made on an Expenses Claim Form and should be supported by receipts. Where a parking meter was used, and no receipt is available a note to that effect should be included with the claim.

Claims for parking excess charges, fines, wheel clamp unlocking, etc. will not be met by COLAT under any circumstances. It is the employee's responsibility to ensure they have legally parked the vehicle.

2.23 Taxis

Where no other form of transport is available, short journeys by taxi will be reimbursed subject to the provision of receipts. When a taxi journey is considered necessary for safety reasons e.g. late at night, such circumstances should be approved by the relevant line manager, Principal/Headteacher in advance. It is not considered appropriate for taxis to be used for long journeys when alternative methods of travel should be used.

2.24 Air, Rail Travel and Local Public Transport Expenses

Prior authorisation from the Academy's Head of Finance will be required for all journeys to foreign countries.

Staff should ensure that the most cost-effective travel arrangements are made.

For air travel within and outside Europe, economy class tickets should be obtained.

Rail travel should be in standard class.

3 Accommodation

3.1 When employees are necessarily away from home overnight on COLAT business they are entitled to claim for hotel or other suitable accommodation.

3.2 Maximum rates for accommodation and subsistence are detailed in Appendix A. Claims for subsistence in excess of these limits must be justified in writing. The authoriser of the claim has the right to reject all or part of the amount in excess of the subsistence rate if he or she is not satisfied with the justification. Written justification for claims in excess of COLAT's subsistence rates must be forwarded with the claim to the CFO for relevant authorisation.

3.3 Where the cost of the hotel room has been paid in advance by COLAT, the employee is responsible for settling the cost of any additional items (newspapers, phone calls, bar, mini-bar, restaurant, etc.) before leaving the hotel.

3.4 Staying with friends or relatives

An allowance of up to £25 per night can be claimed to meet the cost of hospitality provided by a friend or relative as an alternative to staying in commercial accommodation. On each occasion a claim is made, it must be supported by a statement from the employee confirming that payment of the sum claimed was made to the third party.

4 Other expense

Subsistence

When employees are away from their normal place of work on COLAT business they can claim subsistence to cover the cost of food e.g. if away overnight -breakfast and dinner, within the rules and limits in Appendix A, where agreed by the Academy's Head of Finance. Claims must be made on an Expenses Claim form and must be supported by receipts. COLAT will not reimburse any claims for alcohol.

External courses and conferences

Employees may need to attend relevant external courses and conferences in order to perform their duties effectively. Any such courses must be approved in advance by the appropriate Line Manager for reimbursement of expenses to be considered.

HMRC has defined the circumstances in which expenses incurred to attend conferences etc. can be reimbursed tax-free. These include the following conditions:

- The employee must be able to demonstrate that attendance is necessary in order to carry out the duties of the employment. A token business element is insufficient.
- There must be a business requirement to attend – in addition to any personal educational benefit gained.

5 Authorisation of Expense Claims

Claims should be signed by your line manager. Claims must not be authorised by someone more junior than the claimant.

The authoriser confirms that:

- The expenses were necessarily incurred in the performance of duties
- The expenses claimed are not payable from another source
- There is sufficient money in the budget to meet the costs involved
- Due consideration has been given to achieving value for money

Any amendments made to Expenses Claim Forms should be initialled by the authoriser. Under no circumstances will self-authorised claims be paid. In these circumstances alternative authorisation must be obtained. Any attempt to submit false claims will be treated as a serious disciplinary offence.

6 Freedom of Information/Data Protection

In the event of a legitimate request under the Freedom of Information Act relating to expenses claimed by an individual member of staff or officeholder, COLAT will normally disclose outline information about the type of expenditure and the amount claimed, either per claim or for a specified period. It will not normally disclose very detailed information about claims (e.g. itemised restaurant bills) without seeking the permission of the person who submitted the claim.

Appendix A - Subsistence rates & personal incidental expenses

Maximum Subsistence Rates

When employees are away from their normal place of work and incur expenses on food and (if away overnight) accommodation, the appropriate rate of subsistence can be claimed.

“Overnight” subsistence is for a period (or successive periods) of 24 hours and is intended to cover accommodation and breakfast for that period.

No subsistence is payable for any periods when meals and/or accommodation are included in the fare (e.g. for air travel or rail sleeper).

All claims for subsistence must be for actual expenditure incurred and must be supported with receipts. The maximum subsistence rates include taxes (e.g. VAT). Gratuities will not be reimbursed.

The subsistence rates given below are the normal maximum amounts that will be paid.

Written authority from the CFO is required before subsistence in excess of these rates can be paid.

Claims for subsistence must be made on an Expense Claim Form.

Maximum Subsistence Rates Period	Place (away from normal workplace or home)	Maximum Rate per Day
Lunch (if stayed away from home the night before)	All places	£5.50
Dinner (if staying away from home that same night)	All places	£15.00
Overnight (B&B up to 24 hours)	Accommodated by friends/relatives	£25.00
Overnight (B&B up to 24 hours)	Within London	£128.00
Overnight (B&B up to 24 hours)	Outside London	£92.00
Overnight (B&B up to 24 hours)	Overseas	See next paragraph

Overseas Accommodation

Hotel accommodation and meals overseas should be in hotels and restaurants similar in quality to those that would be used in the UK to keep expenditure within the UK subsistence rates. As a guide, hotels should be 3-star, or 4-star in more remote/less secure areas. As the cost of such accommodation and the price of food in restaurants vary so much worldwide, no maximum rates of subsistence are laid down. However, it is expected that staff will seek best value.

Appendix B - Mileage rates

Employees using their own vehicles on COLAT business can claim mileage allowance not exceeding the following rates:


Maximum Mileage Rates Private Vehicle	Cumulative Distance in Tax Year	Rate per Mile
Car	Up to 10,000 business miles	45p.
Car or van	Over 10,000 business miles	25p.
Motorcycle	Any distance	24p.
Bicycle	Any distance	20p.

Additional Passengers

For each employee who travels on business as a passenger an additional 5p per mile can be claimed.

Whistle Blowing Policy

Aims:	<ul style="list-style-type: none"> To create an honest and open culture whereby individuals feel able to speak freely on a range of matters To encourage individuals to raise serious concerns without fear of reprisal or victimisation To support the right of the Trust, each Academy and employees to protect themselves against inappropriate allegations To support and foster the spirit of trust and respect in line with the Trust's values To ensure the Trust employees all operate with a common set of high values and are self-monitoring <p><i>This will be achieved by:</i></p> <ul style="list-style-type: none"> In an honest and open environment, developing a culture of trust that all concerns raised will be followed up quickly and thoroughly
Targets/ Outcomes	<ul style="list-style-type: none"> Create suitable guidelines for all parties in terms of expected conduct, ethics and the values of the Trust Establish safe routes for concerns to be communicated, offering fair protection to those who raise and those who are the focus of such concerns Create a fair and impartial investigative procedure to consider and respond to concerns raised in a timely manner Malicious and unfounded allegations are avoided
Definition:	<ul style="list-style-type: none"> Whistle blowing is the reporting by employees or ex-employees of wrong doing or other illegal or unethical acts undermining the ethos of the Trust or any individual academy on the part of either other employees, management, any local governing body or the Trust board, without fear of reprisal. Employees may, for this purpose, include contractors and agency workers. That one or more of the following matters has happened, is happening or is likely to happen in the future: <ol style="list-style-type: none"> A criminal offence The breach of a legal obligation A miscarriage of justice A danger to the health and safety of any individual Damage to the environment Breach of the Trust's Code of Conduct Deliberate attempt to conceal any of the above. Whistleblowing is not appropriate for dealing with issues covered by other policies and procedures such as: <ul style="list-style-type: none"> Employment disputes Pupil complaints Safeguarding
Roles and Responsibilities:	
Students will:	<ul style="list-style-type: none"> Report appropriate concerns in line with the relevant academy's established students' complaints procedure
All employees will:	<ul style="list-style-type: none"> Actively commit to the honest and open culture engendered by the Trust and each academy and report appropriate concerns in line with the specified procedure of each academy Seek to discuss and resolve concerns promptly to maintain the positive spirit and values of the Trust and each academy Raise concerns at any time about an incident that happened in the past, is happening now, or you believe will happen in the near future Not use whistleblowing falsely or maliciously Adhere to the requirement not to publicly disclose the Trust or any academy's confidential information, unless the Trust or academy fails properly to consider or deal with an issue in line with the specified procedure
Team leaders/Line Managers will:	<ul style="list-style-type: none"> Listen carefully and considerately to concerns and give appropriate feedback Emphasise their support for an honest and open culture and treat all concerns raised to them diligently and sensitively in line with the relevant procedures
Parents and carers will:	<ul style="list-style-type: none"> Inform the relevant academy if their child has made any complaints or they have genuine concerns relating to a teacher or employee Support the academy in the fair and balanced implementation of its performance management procedure
The Academy SLT will:	<ul style="list-style-type: none"> Build student and employee confidence in the policy Investigate escalated concerns diligently and sensitively Support and not discriminate against concerned employees who apply the whistleblowing procedures, provided any claim is made in good faith Implement, monitor, review and revise the policy with governors and the Trust board
Related Docs:	<p>Students Complaints Procedures, Trust Safeguarding Policy and individual academies' safeguarding procedures, and Trust Grievance and Disciplinary Policies</p> <p>Public Interest disclosure Act 1998</p> <p>GOV.UK - Whistleblowing: Public Concern at Work</p> <p>Individual whistleblowing procedures in place at each Academy</p>

	Approval Date:	Monitored By:	Full Review Due:	Review By:
	5 July 2017 Reviewed 18 July 2018 and 11 July 2019	Trustees	July 2021	Trust, Local Governing Bodies, employees,

TEMPLATE WHISTLEBLOWING PROCEDURES

Employees may, on a confidential basis seek prior guidance from the Principal/Headteacher if they wish to establish whether any course of conduct on their part or on the part of another employee may amount to wrongdoing under these procedures. Such enquiry shall be kept confidential. The Principal/Headteacher will attempt to provide guidance on the basis of the information provided, but such guidance shall not prejudice the rights of the Academy or any person under these procedures.

1 WHISTLEBLOWING PROCEDURE

- 1.1 Any issue raised will be kept confidential while the procedure is being used.
- 1.2 The Representor (the person raising the concern) should raise their concern with their line manager. This may be done orally or in writing.
- 1.3 However, if the concern relates to the Representor's line manager or any person to whom he or she reports, other than the Principal/Headteacher, the Representor should raise the issue with the Principal/Headteacher;
- 1.4 If the concern relates to the Principal/Headteacher, the Representor should raise the matter with the Chair of the Local Governing Body.
If the concern relates to the Trust Chief Executive Officer, the Representor should raise the matter with the Chair of the Board of Trustees.
- 1.5 The person with whom the matter is raised is referred to as the "Assessor".

The Assessor will:

- 1.5.1 Interview the Representor as soon as possible within seven working days, in confidence. Early interview will be essential if the concern relates to an immediate danger to loss of life or serious injury or risk to pupils;
- 1.5.2 Obtain as much information as possible from the Representor about the grounds for the belief of wrongdoing;
- 1.5.3 Consult with the Representor about further steps which could be taken;
- 1.5.4 Advise the Representor of the appropriate route if the matter does not fall under this Procedure;
- 1.5.5 Other than in the case of paragraph 1.4, report all matters raised under this procedure to the Chair of the Local Governing Body.
- 1.6 At the interview with the Assessor, the Representor may be accompanied by a recognised trade union representative or a work colleague. The Assessor may be accompanied by a member of the Academy staff to take notes.
The Assessor may at any time disclose the matter to a professionally qualified lawyer for the purpose of taking legal advice. The Assessor may also discuss the issue, in confidence, to other suitable professionals, such as independent HR consultants or school governance providers in order to assess the nature of the case and to inform the outcome of the investigation.
- 1.7 Promptly within ten working days of the interview, the Assessor will recommend one or more of the following:
 - 1.7.1 The matter be further investigated internally by the Trust or the Academy;
 - 1.7.2 The matter be further investigated by external consultants appointed by the Trust/Academy;
 - 1.7.3 The matter be reported to an external agency;
 - 1.7.4 Disciplinary proceedings be implemented against an employee;
 - 1.7.5 The route for the Representor to pursue the matter if it does not fall within this procedure;
or
 - 1.7.6 That no further action be taken by the Trust/Academy.
- 1.8 The grounds on which no further action is taken include:

- 1.8.1 The Assessor is satisfied that, on the balance of probabilities, there is no evidence that wrongdoing within the meaning of this procedure has occurred, is occurring or is likely to occur;
- 1.8.2 The Assessor is satisfied that the Representor is not acting in good faith;
- 1.8.3 The matter is already (or has been) the subject of proceedings under one of the Trust's or Academy's other procedures or policies;
- 1.8.4 The matter concerned is already (or has been) the subject of legal proceedings, or has already been referred to an external agency.
- 1.9 The recommendation of the Assessor will be made to the Principal/Headteacher. However, should it be alleged that the Principal/Headteacher is involved in the alleged wrongdoing; the recommendation will be made to the Local Governing Body.
- 1.10 The Principal/Headteacher or Chair of the Local Governing Body, as appropriate, will ensure that the recommendation is implemented unless there is good reason for not doing so in whole or in part. Such a reason will be reported to the next meeting of the Local Governing Body.
- 1.11 The Representor's identity will be kept confidential unless the Representor otherwise consents or unless there are grounds to believe that the Representor has acted maliciously. In the absence of such consent or grounds, the Assessor will not reveal the identity of the Representor except:
 - 1.11.1 Where the Assessor is under a legal obligation to do so;
 - 1.11.2 Where the information is already in the public domain; or
 - 1.11.3 On a legally privileged basis to a professionally qualified lawyer for the purpose of obtaining legal advice.
- 1.12 The conclusion of any agreed investigation will be reported by the Assessor to the Representor promptly within twenty eight working days of the initial interview.
- 1.13 All responses to the Representor will be made in writing and sent to the Representor's home address.
- 1.14 If the Representor has not had a response within the above time limit or such reasonable extension as the Academy requires, the Representor may go to an appropriate external agency, under paragraph 3, but will inform the Assessor before doing so.
- 1.15 The Representor may at any time disclose the matter on a legally privileged basis to a professionally qualified lawyer for the purpose of taking legal advice.

2 MALICIOUS ACCUSATIONS

- 2.1 A deliberately false or malicious accusation made by a Representor is a disciplinary offence and will be dealt with under the Trust's disciplinary procedure, as well as potentially exposing the Representor to legal liability.


3 INFORMING EXTERNAL AGENCIES

- 3.1 Within the Trust all employees have a duty of confidentiality. The duty of confidentiality is implied by the law in every contract of employment and prohibits employees from publicly disclosing employers' confidential information, unless it is in the public interest that the information is disclosed or unless the Trust or the academy fails to follow required procedures. Other legal restrictions on the disclosure of information, for example under data protection legislation, may also apply.
- 3.2 Whistleblowing to an external agency without first going through the internal procedure is a breach of the Trust's Code of Conduct. The external agencies which may be used if disclosure is permitted under paragraph 3.1 are:
 - 3.2.1 Department for Education (DfE/ESFA). (In these circumstances, the DfE/ESFA will assess whether all school processes have been applied and that the Assessor has done everything possible to resolve the issue. If this is not the case, the DfE/ESFA will refer the matter back to the Assessor);
 - 3.2.2 Member of Parliament;

- 3.2.3 National Audit Office;
 - 3.2.4 Health and Safety Executive;
 - 3.2.5 Police.
- 3.3 Whistleblowing to the media is not appropriate or permitted in any circumstances.

Freedom of Information Policy

Aims:	<ul style="list-style-type: none"> To ensure that the Trust and each Academy fosters an environment of openness about its normal business activities, in line with its community engagement aims To fully comply with the Freedom of Information (FOI) Act 2000, the Data Protection Act 2018 and the Environmental Information Regulations (EIR) Act 2004 To follow best practice as laid out by the Information Commissioner's Office (ICO) in the document <i>Freedom of Information Good Practice Guidance</i> To fully assist anyone who has made a FOI/EIR request or proposes to make a request to the Trust or an Academy to the best of our ability
Targets/ Outcomes	<ul style="list-style-type: none"> Produce a publicly available publication scheme for the Trust and each individual academy. Provide a substantive response to any request for information within 20 days of the request being received; either providing the information or explaining, as fully as possible, why there will be a delay in providing the information (including an estimated time period for the delay) or why we will not be disclosing the information Formally record all requests for information that fall under FOI/EIR, and whether they were disclosed or not Consult with any other Academy within the Trust, the Trust sponsor or other third party if the information requested originated from them and could impact upon their reputation or commerce
Definition:	<ul style="list-style-type: none"> The Freedom of Information Act 2000 (FOIA) gives rights of public access to information held by public authorities Freedom of Information request – is in writing (including email), has an address for reply (including email) and includes a description of the information required Environmental Information Regulation request – all of the above, plus requests can be made via telephone
Roles and Responsibilities:	
All staff will:	<ul style="list-style-type: none"> Pass any request for information stored by the Academy to the Principal's PA (or, in the case of the central Trust function, to the Trust CEO's PA) as soon as they receive it. Refer to the ICO decision tree available online Follow the good practice guidance issued by the ICO when dealing with FOI/EIR requests Assist anyone who has made a FOI/EIR request or proposes to make a request to the best of their ability
The PA to the Principal/CEO will:	<ul style="list-style-type: none"> Monitor requests received and ensure that responses are provided in a timely and complete manner Request reports are prepared for review with the Local Governing Body or Board of Trustees as appropriate
Governors and Trustees will:	<ul style="list-style-type: none"> Monitor and review the effectiveness of the policy Review summary of requests at termly meetings of the Board of Trustees, the Local Governing Body or appropriate sub-committee
Related Docs:	Freedom of Information Act 2000 ICO Guide to freedom of information ICO Model Freedom of Information Publication Scheme Trust Data Protection Policy

	Approval Date:	Monitored By:	Full Review Due:	Review By:
	5 July 2017 Reviewed 18 July 2018 and 11 July 2019	Trustees	July 2020 04	Trust, Local Governing Bodies, employees,

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Data protection policy

City of London Academies Trust



Approved by:

Board of Trustees

Date: July 2019

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1. Aims

The City of London Academies Trust aims to ensure that all personal data collected about staff, pupils, parents, governors, trustees, visitors and other individuals is collected, stored and processed in accordance with the General Data Protection Regulation (GDPR) and the provisions of the Data Protection Act 2018 (DPA 2018).

This policy applies to all personal data, regardless of whether it is in paper or electronic format, and seeks to provide guidance to Trust staff, trustees and governors on the handling of personal data.

2. Legislation and guidance

This policy meets the requirements of the GDPR and the provisions of the DPA 2018. It is based on guidance and best practice published by the Information Commissioner's Office (ICO) on the GDPR and the ICO's code of practice for subject access requests.

It meets the requirements of the Protection of Freedoms Act 2012 when referring to our use of biometric data.

It also reflects the ICO's code of practice for the use of surveillance cameras and personal information.

In addition, this policy complies with our main and supplementary funding agreements and articles of association.

3. Definitions

Term	Definition
Personal data	<p>Any information relating to an identified, or identifiable, individual.</p> <p>This may include the individual's:</p> <ul style="list-style-type: none">• Name (including initials)• Identification number• Location data• Online identifier, such as a username <p>It may also include factors specific to the individual's physical, physiological, genetic, mental, economic, cultural or social identity.</p>
Special categories of personal data	<p>Personal data which is more sensitive and so needs more protection, including information about an individual's:</p> <ul style="list-style-type: none">• Racial or ethnic origin• Political opinions• Religious or philosophical beliefs• Trade union membership

	<ul style="list-style-type: none"> • Genetics • Biometrics (such as fingerprints, retina and iris patterns), where used for identification purposes • Health – physical or mental • Sex life or sexual orientation
Processing	<p>Anything done to personal data, such as collecting, recording, organising, structuring, storing, adapting, altering, retrieving, using, disseminating, erasing or destroying.</p> <p>Processing can be automated or manual.</p>
Data subject	The identified or identifiable individual whose personal data is held or processed.
Data controller	A person or organisation that determines the purposes and the means of processing of personal data.
Data processor	A person or other body, other than an employee of the data controller, who processes personal data on behalf of the data controller.
Personal data breach	A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.

4. The data controller

The Trust processes personal data relating to parents, pupils, staff, governors, trustees, visitors and others, and therefore is a data controller.

The Trust is registered as a data controller with the ICO and will renew this registration annually or as otherwise legally required.

5. Roles and responsibilities

This policy applies to **all staff** employed by our Trust, and to external organisations or individuals working on our behalf. Staff who do not comply with this policy may face disciplinary action.

5.1 Board of Trustees

The Board of Trustees has overall responsibility for ensuring that the Trust and each Academy complies with all relevant data protection obligations.

5.2 Data protection officer

The data protection officer (DPO) is responsible for overseeing the implementation of this policy, monitoring Trust compliance with data protection law, and developing related policies and guidelines where applicable.

They will provide an annual report of their activities directly to the Board of Trustees and, where relevant, report to the board their advice and recommendations on Trust and individual Academy data protection issues.

The DPO is also the first point of contact for individuals whose data the Trust and each Academy processes, and for the ICO.

The DPO shall have the following responsibilities:

- Review of all data processing activities (inventory / mapping);
- Conduct of regular health checks/audits and issue recommendations;
- Assist with data protection impact assessments and monitoring performance;
- Monitoring and advice relating to subject access requests and data breaches;
- Assist the Trust with maintenance of records;
- Monitoring and advice relating to FOI and other information requests;
- Co-operation with, and acting as the contact point for the Information Commissioner's Office, who are the supervisory authority in respect of all data protection matters;
- Act as the contact point for data subjects to deal with requests and complaints;
- Training of Trust staff and workforce.

Our DPO is Data Protection Education contactable via:

Telephone: 0800 0862018

Email: dpo@dataprotection.education

5.3 Academy representative

Each Academy in the Trust will have a nominated person acting as the representative of the data controller on a day-to-day basis within that Academy. The representative is responsible for the implementation of this Data Protection Policy within their Academy.

5.4 All staff

Staff are responsible for:

- Collecting, storing and processing any personal data in accordance with this policy and the policies listed in Section 20.
- Informing the Trust of any changes to their personal data, such as a change of address
- Contacting the DPO in the following circumstances:
 - With any questions about the operation of this policy, data protection law, retaining personal data or keeping personal data secure
 - If they have any concerns that this policy is not being followed
 - If they are unsure whether or not they have a lawful basis to use personal data in a particular way
 - If they need to rely on or capture consent, draft a privacy notice, deal with data protection rights invoked by an individual, or transfer personal data outside the European Economic Area
 - If there has been a data breach
 - Whenever they are engaging in a new activity that may affect the privacy rights of individuals

- If they need help with any contracts or sharing personal data with third parties

6. Data protection principles

The GDPR is based on data protection principles that the Trust must comply with.

The principles say that personal data must be:

- **Processed lawfully, fairly and in a transparent manner** in relation to the data subject and their rights;
- **Collected for specified, explicit and legitimate purposes** and not further processed in a manner that is incompatible with those purposes;
- **Adequate, relevant and limited to what is necessary** in relation to the purposes for which they are processed;
- **Accurate and, where necessary, kept up to date;**
- **Kept in a form which permits identification of data subjects for no longer than is necessary;**
- **Processed in a manner that ensures appropriate security of the personal data**
- **Must NOT be transferred to people or organisations situated in other countries without adequate protection.**

This policy sets out how the Trust aims to comply with these principles.

7. Collecting personal data

7.1 Lawfulness, fairness and transparency

The Trust will only process personal data where it has one of 6 'lawful bases' (legal reasons) to do so under data protection law:

- The data needs to be processed so that the Trust can **fulfil a contract** with the individual, or the individual has asked the Trust to take specific steps before entering into a contract
- The data needs to be processed so that the Trust can **comply with a legal obligation**
- The data needs to be processed to ensure the **vital interests** of the individual e.g. to protect someone's life
- The data needs to be processed so that the Trust, as a public authority, can perform a task **in the public interest**, and carry out its official functions
- The data needs to be processed for the **legitimate interests** of the Trust or a third party (provided the individual's rights and freedoms are not overridden)
- The individual (or their parent/carers when appropriate in the case of a pupil) has freely given clear **consent**. If an Academy offers online services to pupils, such as classroom apps, and intends to rely on consent as a basis for processing, the Academy will get parental consent where the pupil is under 13 (except for online counselling and preventive services).

For special categories of personal data, the Trust will also meet one of the special category conditions for processing which are set out in the GDPR and Data Protection Act 2018.

Whenever an Academy first collects personal data directly from individuals, the Academy will provide them with the relevant information required by data protection law.

7.2 Limitation, minimisation and accuracy

The Trust will only collect personal data for specified, explicit and legitimate reasons. The Trust will explain these reasons to the individuals when first collecting their data.

If the Trust wants to use personal data for reasons other than those given when the data was first obtained, the Trust will inform the individuals concerned before doing so and seek consent where necessary.

Staff must only process personal data where it is necessary in order to do their jobs.

When staff no longer need the personal data they hold, they must ensure it is deleted or anonymised. This will be done in accordance with the Trust's Records Retention Policy.

8. Sharing personal data

The Trust may share personal data when there is a lawful basis to do so as defined above in Section 7.1.

The Trust may share personal data where:

- There is an issue with a pupil or parent/carer that puts the safety of Trust staff at risk
- The Trust needs to liaise with other agencies – the Trust will seek consent as necessary before doing this
- Trust suppliers or contractors need data to enable the Trust to provide services to its staff and pupils – for example, IT companies. When doing this, the Trust will:
 - Only appoint suppliers or contractors which can provide sufficient guarantees that they comply with current data protection law
 - Establish a data sharing agreement with the supplier or contractor, either in the contract or as a standalone agreement, to ensure the fair and lawful processing of any personal data we share
 - Only share data that the supplier or contractor needs to carry out their service, and information necessary to keep them safe while working with the Trust

The Trust will also share personal data with law enforcement and government bodies where it is legally required to do so, including for:

- The prevention or detection of crime and/or fraud
- The apprehension or prosecution of offenders
- The assessment or collection of tax owed to HMRC
- In connection with legal proceedings
- Where the disclosure is required to satisfy the Trust's safeguarding obligations
- Research and statistical purposes, as long as personal data is sufficiently anonymised, or consent has been provided

The Trust may also share personal data with emergency services and local authorities to help them to respond to an emergency situation that affects any pupils or staff.

Where the Trust transfers personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

9. Subject access requests and other rights of individuals

9.1 Subject access requests

Individuals have a right to make a 'subject access request' to gain access to personal information that the Trust holds about them. This includes:

- Confirmation that their personal data is being processed
- Access to a copy of the data
- The purposes of the data processing
- The categories of personal data concerned
- Who the data has been, or will be, shared with

- How long the data will be stored for, or if this isn't possible, the criteria used to determine this period
- The source of the data, if not the individual
- Whether any automated decision-making is being applied to their data, and what the significance and consequences of this might be for the individual

Subject access requests must be submitted in writing, either by letter, email or fax to the DPO. They should include:

- Name of individual
- Correspondence address
- Contact number and email address
- Details of the information requested

If staff receive a subject access request they must immediately forward it to the DPO. Subject access requests should be managed in accordance with the Trust Subject Access Request procedure.

9.2 Children and subject access requests

Personal data about a child belongs to that child, and not the child's parents or carers. For a parent or carer to make a subject access request with respect to their child, the child must either be unable to understand their rights and the implications of a subject access request or have given their consent.

Children aged 12 and above are generally regarded to be mature enough to understand their rights and the implications of a subject access request. Therefore, most subject access requests from parents or carers of pupils aged 12 and above at our Academies may not be granted without the express permission of the pupil. This is not a rule and a pupil's ability to understand their rights will always be judged on a case-by-case basis.

9.3 Responding to subject access requests

When responding to requests, the Trust:

- May ask the individual to provide 2 forms of identification
- May contact the individual via phone to confirm the request was made
- Will respond without delay and within 1 month of receipt of the request
- Will provide the information free of charge
- May tell the individual the Trust will comply within 3 months of receipt of the request, where a request is complex or numerous. The Trust will inform the individual of this within 1 month, and explain why the extension is necessary

The Trust will not disclose information if it:

- Might cause serious harm to the physical or mental health of the pupil or another individual
- Would reveal that the child is at risk of abuse, where the disclosure of that information would not be in the child's best interests
- Is contained in adoption or parental order records
- Is given to a court in proceedings concerning the child

If the request is unfounded or excessive, the Trust may refuse to act on it, or charge a reasonable fee which takes into account administrative costs.

A request will be deemed to be unfounded or excessive if it is repetitive or asks for further copies of the same information.

When the Trust refuses a request, the individual will be told why, and told they have the right to complain to the ICO.

9.4 Other data protection rights of the individual

In addition to the right to make a subject access request (see above), and to receive information when the Trust is collecting their data about how the Trust uses and processes it (see section 7), individuals also have the right to:

- Withdraw their consent to processing at any time
- Ask the Trust to rectify, erase or restrict processing of their personal data, or object to the processing of it (in certain circumstances)
- Prevent use of their personal data for direct marketing
- Challenge processing which has been justified on the basis of public interest
- Request a copy of agreements under which their personal data is transferred outside of the European Economic Area
- Object to decisions based solely on automated decision making or profiling (decisions taken with no human involvement, that might negatively affect them)
- Prevent processing that is likely to cause damage or distress
- Be notified of a data breach in certain circumstances
- Make a complaint to the ICO
- Ask for their personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances)

Individuals should submit any request to exercise these rights to the DPO. If staff receive such a request, they must immediately forward it to the DPO.

10. Parental requests to see the educational record

There is no automatic parental right of access to the educational record of their child in the Trust academies. However, each academy will consider any parental requests on an individual basis and may choose to provide the information requested subject to the wider requirements of this Data Protection policy and the General Data Protection Regulation.

11. Biometric recognition systems

Where the Trust uses pupils' biometric data as part of an automated biometric recognition system (for example, pupils use fingerprints to receive lunches instead of paying with cash), we will comply with the requirements of the Protection of Freedoms Act 2012. (In the context of the Protection of Freedoms Act 2012, a "child" means a person under the age of 18).

Parents/carers will be notified before any biometric recognition system is put in place or before their child first takes part in it. The Trust will get written consent from at least one parent or carer before taking any biometric data from their child and first processing it.

Parents/carers and pupils have the right to choose not to use the Trust's biometric systems. The Trust will provide alternative means of accessing the relevant services for those pupils.

Parents/carers and pupils can object to participation in the Trust's biometric recognition system(s), or withdraw consent, at any time, and the Trust will make sure that any relevant data already captured is deleted.

As required by law, if a pupil refuses to participate in, or continue to participate in, the processing of their biometric data, the Trust will not process that data irrespective of any consent given by the pupil's parent(s)/carer(s).

Where staff members or other adults use the Trust's biometric system(s), the Trust will also obtain their consent before they first take part in it and provide alternative means of accessing the relevant service if they object. Staff and other adults can also withdraw consent at any time, and the Trust will delete any relevant data already captured.

12. CCTV

The Trust uses CCTV in various locations around the Trust Academy sites to ensure the sites remain safe. The Trust will adhere to the ICO's code of practice for the use of CCTV.

The Trust does not need to ask individuals' permission to use CCTV but makes it clear where individuals are being recorded. Security cameras are clearly visible and accompanied by prominent signs explaining that CCTV is in use.

Any enquiries about the CCTV system should be directed to the main office at the relevant Academy.

13. Photographs and videos

As part of our activities, we may take photographs and record images of individuals within our Academies using only academy-owned devices and equipment.

The Academy will obtain written consent from parents/carers for photographs and videos to be taken of their child for communication, marketing and promotional materials. The Academy will clearly explain how the photograph and/or video will be used to both the parent/carers and pupil.

Where parental consent is needed, the Academy will clearly explain how the photograph and/or video will be used to both the parent/carers and pupil. Where parental consent is not needed, the Academy will clearly explain to the pupil how the photograph and/or video will be used.

Uses may include:

- Within an Academy on notice boards and in magazines, brochures, newsletters, etc.
- Outside of an Academy by external agencies such as the school photographer, newspapers, campaigns
- Online on our Trust and/or Academy websites or social media pages

Consent can be refused or withdrawn at any time. If consent is withdrawn, the Trust will delete the photograph or video and not distribute it further.

When using photographs and videos in this way the Trust will not accompany them with any other personal information about the child, to ensure they cannot be identified.

14. Data protection by design and default

The organisation takes data protection very seriously and will consider and comply with the requirements of Data Protection Legislation in relation to all of its activities whenever these involve the use of personal data, in accordance with the principles of data protection by design and default.

The Trust will put measures in place to show that it has integrated data protection into all of its data processing activities, including:

- Appointing a suitably qualified DPO, and ensuring they have the necessary resources to fulfil their duties and maintain their expert knowledge
- Only processing personal data that is necessary for each specific purpose of processing, and always in line with the data protection principles set out in relevant data protection law (see section 6)

- Completing privacy impact assessments where the Trust's processing of personal data presents a high risk to rights and freedoms of individuals, and when introducing new technologies (the DPO will advise on this process). The Trust will complete an assessment of any such proposed processing, in consultation with the DPO, and will use a template document which ensures that all relevant matters are considered.
- Integrating data protection into internal documents including this policy, any related policies and privacy notices
- Regularly training members of staff on data protection law, this policy, any related policies and any other data protection matters; we will also keep a record of attendance
- Regularly conducting reviews and audits to test the Trust's privacy measures and make sure it is compliant
- Maintaining records of the Trust's processing activities, including:
 - For the benefit of data subjects, making available the name and contact details of the Trust and DPO and all information the Trust is required to share about how their personal data is used and processed (via Trust privacy notices)
 - For all personal data that the Trust holds, maintaining an internal record of the type of data, data subject, how and why the data is being used, any third-party recipients, how and why the data is being stored, retention periods and how the data is being kept secure

15. Data security and storage of records

The Trust will protect personal data and keep it safe from unauthorised or unlawful access, alteration, processing or disclosure, and against accidental or unlawful loss, destruction or damage.

In particular:

- Paper-based records and portable electronic devices, such as laptops and hard drives that contain personal data are kept under lock and key when not in use
- Papers containing confidential personal data must not be left on office and classroom desks, on staffroom tables, pinned to notice/display boards, or left anywhere else where there is general access
- Where personal information needs to be taken off site, staff must sign it in and out from the relevant Academy office
- Use of strong passwords to access Trust computers, laptops and other electronic devices. Staff and pupils are reminded to change their passwords at regular intervals
- Encryption software is used to protect all portable devices and removable media, such as laptops and USB devices
- Staff, pupils or governors who store personal information on their personal devices are expected to follow the same security procedures as for Trust-owned equipment (see our ICT Acceptable Use Policies)
- Where the Trust needs to share personal data with a third party, the Trust will carry out due diligence and take reasonable steps to ensure it is stored securely and adequately protected (see section 8)

16. Disposal of records

Personal data that is no longer needed will be disposed of securely. Personal data that has become inaccurate or out of date will also be disposed of securely, where the Trust cannot or does not need to rectify or update it.

For example, paper-based records will be shredded or incinerated, and electronic files overwritten or deleted. The Trust may also use a third party to safely dispose of records on its behalf. If it does so, the Trust will require the third party to provide sufficient guarantees that it complies with data protection law.

17. Personal data breaches

The Trust will make all reasonable endeavours to ensure that there are no personal data breaches.

In the unlikely event of a suspected data breach, the Trust will follow the procedure set out in appendix 1.

When appropriate, the Trust will report the data breach to the ICO within 72 hours. Such breaches in an academy context may include, but are not limited to:

- A non-anonymised dataset being published on the Trust or an Academy website which shows the exam results of pupils eligible for the pupil premium
- Safeguarding information being made available to an unauthorised person
- The theft of a Trust laptop containing non-encrypted personal data about pupils

18. Training

All staff and governors are provided with data protection training as part of their induction process.

Data protection will also form part of continuing professional development, where changes to legislation, guidance or the Trust's processes make it necessary.

19. Monitoring arrangements

The DPO is responsible for monitoring and reviewing this policy.

This policy will be reviewed and updated if necessary when the Data Protection Bill receives royal assent and becomes law (as the Data Protection Act 2018) – if any changes are made to the bill that affect our Trust's practice. Otherwise, or from then on, this policy will be reviewed **annually**.

20. Links with other policies

This data protection policy is linked to our:

- Freedom of Information Policy
- Records Retention Policy
- ICT Acceptable Use Policy

Appendix 1: Personal data breach procedure

This procedure is based on guidance on personal data breaches produced by the ICO.

- On finding or causing a breach, or potential breach, the staff member or data processor must immediately notify the DPO
- The DPO will investigate the report and determine whether a breach has occurred. To decide, the DPO will consider whether personal data has been accidentally or unlawfully:
 - Lost
 - Stolen
 - Destroyed
 - Altered
 - Disclosed or made available where it should not have been
 - Made available to unauthorised people
- The DPO will alert the principal/headteacher, academy representative and the chair of governors of the relevant Academy, the Trust Chief Financial Officer and Chief Executive Officer and the Chair of the Trust Board.
- The DPO will make all reasonable efforts to contain and minimise the impact of the breach, assisted by relevant staff members or data processors where necessary. (Actions relevant to specific data types are set out at the end of this procedure)
- The DPO will assess the potential consequences, based on how serious they are, and how likely they are to happen
- The DPO will work out whether the breach must be reported to the ICO. This must be judged on a case-by-case basis. To decide, the DPO will consider whether the breach is likely to negatively affect people's rights and freedoms, and cause them any physical, material or non-material damage (e.g. emotional distress), including through:
 - Loss of control over their data
 - Discrimination
 - Identify theft or fraud
 - Financial loss
 - Unauthorised reversal of pseudonymisation (for example, key-coding)
 - Damage to reputation
 - Loss of confidentiality
 - Any other significant economic or social disadvantage to the individual(s) concerned

If it's likely that there will be a risk to people's rights and freedoms, the DPO must notify the ICO.

- The DPO will document the decision (either way), in case it is challenged at a later date by the ICO or an individual affected by the breach. Documented decisions are stored in a password protected file on the Trust's computer system.
- Where the ICO must be notified, the DPO will do this via the 'report a breach' page of the ICO website within 72 hours. As required, the DPO will set out:
 - A description of the nature of the personal data breach including, where possible:
 - The categories and approximate number of individuals concerned
 - The categories and approximate number of personal data records concerned

- The name and contact details of the DPO
- A description of the likely consequences of the personal data breach
- A description of the measures that have been, or will be taken, to deal with the breach and mitigate any possible adverse effects on the individual(s) concerned
- If all the above details are not yet known, the DPO will report as much as they can within 72 hours. The report will explain that there is a delay, the reasons why, and when the DPO expects to have further information. The DPO will submit the remaining information as soon as possible
- The DPO will also assess the risk to individuals, again based on the severity and likelihood of potential or actual impact. If the risk is high, the DPO will promptly inform, in writing, all individuals whose personal data has been breached. This notification will set out:
 - The name and contact details of the DPO
 - A description of the likely consequences of the personal data breach
 - A description of the measures that have been, or will be, taken to deal with the data breach and mitigate any possible adverse effects on the individual(s) concerned
- The DPO will notify any relevant third parties who can help mitigate the loss to individuals – for example, the police, insurers, banks or credit card companies
- The DPO will document each breach, irrespective of whether it is reported to the ICO. For each breach, this record will include the:
 - Facts and cause
 - Effects
 - Action taken to contain it and ensure it does not happen again (such as establishing more robust processes or providing further training for individuals)

Records of all breaches will be stored in a password protected file on the Trust's computer system.

- The DPO, academy representative and principal/headteacher of the relevant academy will meet to review what happened and how it can be stopped from happening again. This meeting will happen as soon as reasonably possible

Actions to minimise the impact of data breaches

The Trust will take the actions set out below to mitigate the impact of different types of data breach, focusing especially on breaches involving particularly risky or sensitive information. The Trust will review the effectiveness of these actions and amend them as necessary after any data breach.

Sensitive information being disclosed via email (including safeguarding records)

- If special category data (sensitive information) is accidentally made available via email to unauthorised individuals, the sender must attempt to recall the email as soon as they become aware of the error
- Members of staff who receive personal data sent in error must alert the sender and the DPO as soon as they become aware of the error
- If the sender is unavailable or cannot recall the email for any reason, the DPO will ask the ICT department to recall it
- In any cases where the recall is unsuccessful, the DPO will contact the relevant unauthorised individuals who received the email, explain that the information was sent in error, and request that those individuals delete the information and do not share, publish, save or replicate it in any way
- The DPO will ensure the Trust receives a written response from all the individuals who received the data, confirming that they have complied with this request

- The DPO will carry out an internet search to check that the information has not been made public; if it has, the Trust will contact the publisher/website owner or administrator to request that the information is removed from their website and deleted

EXAMPLES OF DATA BREACHES

- *Loss or theft of paper records or loss or theft of equipment on which data is stored e.g. a laptop, mobile phone, tablet device or memory stick;*
- *A letter or email containing personal and/or confidential data sent to the wrong address (including internal staff or third parties) or an email to an unauthorised group of email boxes;*
- *Personal data disclosed orally in error in a meeting or over the phone – including “blogging” where information is obtained by deceiving The Organisation, or where information has been disclosed without confirming the true identity of the requester;*
- *Unauthorised access to information classified as personal or confidential e.g. attaching documents to an outlook diary appointment that is openly accessible;*
- *Posting information on the world wide web or on a computer otherwise accessible from the Internet without proper information security precautions;*
- *Sensitive information left on a photocopier or on a desk in County Council premises;*
- *Unauthorised alteration or deletion of information;*
- *Not storing personal and confidential information securely;*
- *Not ensuring the proper transfer or destruction of files after closure of offices/buildings e.g. not following building decommissioning procedures;*
- *Failure to safeguard/remove personal data on office equipment (including computers and smart phones) before disposal/sale.*

Examples of Breaches caused by IT Security Incidents:

- *Unauthorised access to IT systems because of misconfigured and/or inappropriate access controls;*
- *Hacking or phishing attacks and related suspicious activity;*
- *Virus or malware attacks and related suspicious activity;*
- *ICT infrastructure-generated suspicious activity;*
- *Divulging a password to another user without authority.*


APPENDIX 2. DEALING WITH SUBJECT ACCESS REQUESTS

What must the school do?	Why?	How?
We must be clear about the nature of the request and identify what information is being requested.	Being clear about the nature of the request will enable you to decide whether the request needs to be dealt with in accordance with statutory requirements, who needs to deal with the request, and/or whether this is business as usual (BAU). If needed ask the submitter of the request for clarity.	<p>Review the request and identify:</p> <p>If the request is for the personal information of the requester or made by an individual on behalf of another person (e.g. on behalf of a child or an adult lacking capacity) – this is a subject access request;</p> <p>If the request is for non-personal information – this may be dealt with as BAU or formally under the Freedom of Information Act 2000 (the FOIA) or the Environmental Information Regulations 2004 (the EIR).</p> <p>NB: The request can be received in a range of different formats e.g. letter, email, a completed form, or can be made via social media (e.g. a Facebook page or Twitter account).</p>
If the request is a SAR the request must be forwarded to the responsible member of staff (usually the Headteacher) and the Data Protection Officer within two working days of receipt of the request.	The GDPR stipulates that SARs must be completed within one month of the request – but in reality, as soon as possible.	Log the SAR in the subject access request log and inform all appropriate staff required to deal with the request.

<p>If the information requested is for non-personal information i.e. is organisational or statistical information, this will fall under the FOIA or EIR, or BAU and will be dealt with, as follows:</p> <p>All non-routine FOIA or EIR requests must be forwarded to the responsible member of staff (usually the Headteacher) and the Data Protection Officer within two working days of receipt of the request.</p>	<p>The FOIA and EIR stipulates that requests must be completed within 20 working days of the request – therefore the more swiftly request is being dealt with, the more likely The Organisation will meet its statutory deadlines.</p> <p>BAU requests need to be dealt with by an individual in that particular service area who can identify and locate the information requested and provide a response within a reasonable timeframe.</p>	<p>If the request is for non-routine/FOIA/EIR information contact the responsible member of staff (usually the Headteacher) and the Data Protection Officer.</p>
<p>If the information requested is for the personal information of an individual for use in a criminal investigation by the police, or any other agency investigating criminal offences, this will fall under either the regulatory Investigative Powers Act 2000 (RIPA) or Data Protection Act 2018.</p> <p>The request can be for either hard copy or any type of electronic information including email traffic i.e. the time and information that an email is sent.</p> <p>The request must be forwarded to the responsible member of staff (usually the Headteacher) and the Data Protection Officer within two days.</p>	<p>It is in the public interest that requests are identified and dealt with as quickly as possible.</p>	<p>Scan and email the request to the responsible member of staff (usually the Headteacher) and the Data Protection Officer as needed.</p>

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Records Retention Policy

 CITY OF LONDON ACADEMIES TRUST	Approval Date:	Monitored By:	Full Review Due:	Review By:
	11 July 2019	Trustees	July 2020	Trustees, Local Governing Bodies, employees,

1. Aims

The City of London Academies Trust aims to ensure that all personal data collected about staff, pupils, parents, governors, trustees, visitors and other individuals is collected, stored and processed in accordance with the General Data Protection Regulation (GDPR) and the provisions of the Data Protection Act 2018 (DPA 2018).

The Trust has created this policy to outline how records are stored, accessed, monitored and disposed of, and how long data is retained for, in order to meet the Trust's statutory requirements and to ensure that all records are only kept for as long as is necessary to fulfil the purpose(s) for which they were intended

This policy applies to all personal data, regardless of whether it is in paper or electronic format, and seeks to provide guidance to Trust staff, trustees and governors on the handling of personal data.

2. Legal framework

This policy has due regard to statutory legislation including, but not limited to, the following:

- the General Data Protection Regulation (GDPR) and the provisions of the Data Protection Act 2018 (DPA 2018)
- Freedom of Information Act 2000
- Limitation Act 1980 (as amended)

This policy also has due regard to the guidance provided in the Information Records Management Society 'Information Management Toolkit for [AcademiesSchools](#)' 2019⁶

This policy will be implemented in accordance with the following Trust policies and procedures:

- Data Protection Policy
- Freedom of Information Policy

3. Responsibilities

The whole Trust and all employees, trustees and governors have a responsibility for maintaining its records and record-keeping systems in line with statutory requirements.

The Trustees hold overall responsibility for this policy and for ensuring it is implemented correctly.

The Local Governing Body of each Academy is responsible for promoting compliance with this policy in each Academy.

Each Academy in the Trust will have a nominated person acting as the representative of the data controller on a day-to-day basis within that Academy (the 'Academy Representative'). The representative is responsible for the implementation of the Trust Data Protection Policy within their Academy.

All staff members are responsible for ensuring that any records for which they are responsible for are accurate, maintained securely and disposed of correctly, in line with the provisions of this policy and in accordance with the retention periods outlined in this policy.

4. Retention of pupil records and other pupil-related information

The table below outlines the Trust's retention periods for individual pupil records and the action that will be taken after the retention period, in line with any requirements. Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
Admissions		
Register of admissions	Three years after the date on which the entry was made	Information is reviewed, and the register may be kept permanently
Secondary school admissions	The current academic year, plus one year	Securely disposed of
Proof of address (supplied as part of the admissions process)	The current academic year, plus one year	Securely disposed of
Supplementary information submitted, including religious, medical information, etc. (where the admission was successful)	Added to the pupil's record	Securely disposed of
Supplementary information submitted, including religious, medical information, etc. (where the admission was not successful)	Until the appeals process has been completed	Securely disposed of
Pupils' educational records		
Pupils' educational records – Primary	Whilst the pupil remains at the Academy	Transferred to the destination – if this is an independent school, home-schooling or outside of the UK, the file will be kept by the LA and retained for the statutory period
Pupils' educational records - Secondary	25 years after the pupil's date of birth	Securely disposed of
Public examination results	Added to the pupil's record	Returned to the examination board
Internal examination results	Added to the pupil's record	Securely disposed of
Child protection information held on a pupil's record	Stored in a sealed envelope for the same length of time as the pupil's record	Securely disposed of – shredded
Child protection records held in a separate file	25 years after the pupil's date of birth	Securely disposed of – shredded

Attendance		
Attendance registers	Last date of entry on to the register, plus three years	Securely disposed of
Letters authorising absence	Current academic year, plus two years	Securely disposed of
SEND		
SEND files, reviews and individual education plans	25 years after the pupil's date of birth (as stated on the pupil's record)	Information is reviewed, and the file may be kept for longer than necessary if it is required for the Trust to defend itself in a 'failure to provide sufficient education' case
Statement of SEN maintained under section 324 of the Education Act 1996 (and any amendments to the statement)	25 years after the pupil's date of birth (as stated on the pupil's record)	Securely disposed of, unless it is subject to a legal hold
Information and advice provided to parents regarding SEND	25 years after the pupil's date of birth (as stated on the pupil's record)	Securely disposed of, unless it is subject to a legal hold
Accessibility strategy	25 years after the pupil's date of birth (as stated on the pupil's record)	Securely disposed of, unless it is subject to a legal hold
Curriculum management		
SATs results	25 years after the pupil's date of birth (as stated on the pupil's record)	Securely disposed of
Examination papers	Until the appeals/validation process has been completed	Securely disposed of
Published Admission Number (PAN) Reports	Current academic year, plus six years	Securely disposed of
Valued added and contextual data	Current academic year, plus six years	Securely disposed of
Self-evaluation forms	Current academic year, plus six years	Securely disposed of

Pupils' work	Returned to pupils at the end of the academic year, or retained for the current academic year, plus one year	Securely disposed of
Extra-curricular activities		
Parental consent forms for school trips where no major incident occurred	Until the conclusion of the trip	Securely disposed of
Parental consent forms for school trips where a major incident occurred	25 years after the pupil's date of birth, on the pupil's record (permission slips of all pupils on the trip will also be held to show that the rules had been followed for all pupils)	Securely disposed of
Walking bus registers	Three years from the date of the register being taken	Securely disposed of
Family liaison officers and home-school liaison assistants		
Day books	Current academic year, plus two years	Reviewed, and destroyed if no longer required
Reports for outside agencies	Duration of the pupil's time at school	Securely disposed of
Referral forms	Whilst the referral is current	Securely disposed of
Contact data sheets	Current academic year	Reviewed, and destroyed if no longer active
Contact database entries	Current academic year	Reviewed, and destroyed if no longer required
Group registers	Current academic year, plus two years	Securely disposed of

5. Retention of staff records

The table below outlines the Trust's retention periods for staff records and the action that will be taken after the retention period, in line with any requirements. Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
Operational		
Staff personal file	Termination of employment, plus six years	Securely disposed of
Timesheets	Current academic year, plus six years	Securely disposed of
Annual appraisal and assessment records	Current academic year, plus five years	Securely disposed of
Recruitment		
Records relating to the appointment of a new principal/headteacher	Date of appointment, plus six years	Securely disposed of
Records relating to the appointment of new members of staff (unsuccessful candidates)	Date of appointment of successful candidate, plus six months	Securely disposed of
Records relating to the appointment of new members of staff (successful candidates)	Relevant information added to the member of staff's personal file, and other information retained for six months	Securely disposed of
DBS certificates	Up to six months	Securely disposed of
Proof of identify as part of the enhanced DBS disclosure	After identity has been proven	Reviewed and a note kept of what was seen and what has been checked – if it is necessary to keep a copy this will be placed on the staff member's personal file, if not, securely disposed of
Evidence of right to work in the UK	Added to staff personal file or, if kept separately, termination of employment, plus no longer than two years	Securely disposed of

Type of file	Retention period	Action taken after retention period ends
Disciplinary and grievance procedures		
Child protection allegations, including where the allegation is unproven	Added to staff personal file, and until the individual's normal retirement age, or 10 years from the date of the allegation – whichever is longer If allegations are malicious, they are removed from personal files	Reviewed and securely disposed of – shredded
Oral warnings	Date of warning, plus six months	Securely disposed of – if placed on staff personal file, removed from file
Written warning – level 1	Date of warning, plus six months	Securely disposed of – if placed on staff personal file, removed from file
Written warning – level 2	Date of warning, plus 12 months	Securely disposed of – if placed on staff personal file, removed from file
Final warning	Date of warning, plus 18 months	Securely disposed of – if placed on staff personal file, removed from file
Records relating to unproven incidents	Conclusion of the case, unless the incident is child protection related and is disposed of as above	Securely disposed of

6. Retention of senior leadership and management records

The table below outlines the Trust's retention periods for senior leadership and management records, and the action that will be taken after the retention period, in line with any requirements. Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
Board of Trustees and Local Governing Bodies		
Agendas for meetings	One copy alongside the original set of minutes – all others disposed of	Securely disposed of
Original, signed copies of the minutes of meetings	Permanent	

Inspection copies of the minutes of meetings	Date of meeting, plus three years	Shredded if they contain any sensitive, personal information
Reports presented to the Board of Trustees or Local Governing Bodies	Minimum of six years, unless they refer to individual reports – these are kept permanently	Securely disposed of or, if they refer to individual reports, retained with the signed, original copy of minutes
Instruments of government, including articles of association	Permanent	
Policy documents created and administered by the Board of Trustees or Local Governing Bodies	Duration of the policy, plus three years	Securely disposed of
Records relating to complaints dealt with by the Board of Trustees or Local Governing Bodies	Date of the resolution of the complaint, plus a minimum of six years	Reviewed for further retention in case of contentious disputes, then securely disposed of
Principal/Headteacher and senior leadership team (SLT) in each Academy		
Minutes of SLT meetings and the meetings of other internal administrative bodies	Date of the meeting, plus three years	Reviewed, and securely disposed of
Reports created by the Principal/headteacher or SLT	Date of the report, plus a minimum of three years	Reviewed, and securely disposed of
Records created by the Principal/headteacher, deputy Principal/headteacher, heads of year and other members of staff with administrative responsibilities	Current academic year, plus six years	Reviewed, and securely disposed of
Correspondence Principal/headteacher, deputy Principal/headteacher, heads of year and other members of staff with administrative responsibilities	Date of correspondence, plus three years	Reviewed, and securely disposed of
Professional development plan	Duration of the plan, plus six years	Securely disposed of
School development plan	Duration of the plan, plus three years	Securely disposed of

7. Retention of health and safety records

The table below outlines the Trust's retention periods for health and safety records, and the action that will be taken after the retention period, in line with any requirements. Electronic copies of any information and files will also be destroyed in line with the retention periods below. Any information relating to medical records (e.g. sickness absence notes) should be kept in hard copy.

Type of file	Retention period	Action taken after retention period ends
Health and safety		
Health and safety policy statements	Duration of policy, plus three years	Securely disposed of
Health and safety risk assessments	Duration of risk assessment, plus three years	Securely disposed of
Records relating to accidents and injuries at work	Date of incident, plus 12 years In the case of serious accidents, a retention period of 15 years is applied	Securely disposed of
Accident reporting – adults	Date of the incident, plus six years	Securely disposed of
Accident reporting – pupils	25 years after the pupil's date of birth, on the pupil's record	Securely disposed of
COSHH	Current academic year, plus 40 years	Securely disposed of
Information relating to areas where employees and persons are likely to come into contact with asbestos	Date of last action, plus 40 years	Securely disposed of
Information relating to areas where employees and persons are likely to come into contact with radiation	Date of last action, plus 50 years	Securely disposed of
Fire precautions log books <u>logbooks</u>	Current academic year, plus six years	Securely disposed of

8. Retention of financial records

Every company must keep adequate accounting records as defined in the Companies Act 2006.

Section 388 of the Companies Act 2006 requires that accounting records, once made, must be preserved for at least six years (public companies) or three years (private companies). It follows that where software is needed for retrieval of information in usable form, it must be available for use for the same period, as must any necessary hardware. VAT records must also be kept for at least six years.

The table below outlines the Trust's retention periods for financial records and the action that will be taken after the retention period, in line with any requirements. Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
Payroll pensions		
Maternity pay records	Current academic year, plus three years	Securely disposed of
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995 (as amended)	Current academic year, plus six years	Securely disposed of
Risk management and insurance		
Employer's liability insurance certificate	Closure of the Academy, plus 40 years	Securely disposed of
Asset management		
Inventories of furniture and equipment	Current academic year, plus six years	Securely disposed of
Burglary, theft and vandalism report forms	Current academic year, plus six years	Securely disposed of
Accounts and statements including budget management		
Annual accounts	Current academic year, plus six years	Disposed of against common standards
Records maintained in Financial accounting software	Current academic year, plus six years	Securely disposed of
Loans and grants managed by the Academy	Date of last payment, plus 12 years	Information is reviewed, then securely disposed of
All records relating to the creation and management of budgets	Duration of the budget, plus three years	Securely disposed of
Invoices, receipts, order books and requisitions, delivery notices	Current financial year, plus six years	Securely disposed of

Records relating to the collection and banking of monies	Current financial year, plus six years	Securely disposed of
Records relating to the identification and collection of debt	Current financial year, plus six years	Securely disposed of
Contract management		
All records relating to the management of contracts under seal	Last payment on the contract, plus 12 years	Securely disposed of
All records relating to the management of contracts under signature	Last payment on the contract, plus six years	Securely disposed of
All records relating to the monitoring of contracts	Current academic year, plus two years	Securely disposed of
School fund		
Cheque books, paying in books, ledgers, invoices, receipts, bank statements and journey books	Current academic year, plus six years	Securely disposed of
School meals		
Free school meals registers	Current academic year, plus six years	Securely disposed of
School meals registers	Current academic year, plus three years	Securely disposed of
School meals summary sheets	Current academic year, plus three years	Securely disposed of

9. Retention of other Trust records

The table below outlines the Trust's retention periods for any other records held by the Trust, and the action that will be taken after the retention period, in line with any requirements. Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
Property management		
Title deeds of properties belonging to the Trust	Permanent	Transferred to new owners if the building is leased or sold
Plans of property belonging to the Trust	For as long as the building belongs to the Trust	Transferred to new owners if the building is leased or sold

Leases of property leased by or to the Trust	Expiry of lease, plus six years	Securely disposed of
Records relating to the letting of Trust premises	Current financial year, plus six years	Securely disposed of
Maintenance		
All records relating to the maintenance of the Academy properties carried out by contractors	Current academic year, plus six years	Securely disposed of
All records relating to the maintenance of the Academy properties	Current academic year, plus six years	Securely disposed of
Operational administration		
General file series	Current academic year, plus five years	Reviewed, and securely disposed of
Records relating to the creation and publication of Academy brochures and/or prospectuses	Current academic year, plus three years	Disposed of against common standards
Records relating to the creation and distribution of circulars to staff, parents or pupils	Current academic year, plus one year	Disposed of against common standards
Newsletters and other items with short operational use	Current academic year plus one year	Disposed of against common standards
Visitors' books and signing-in sheets	Current academic year, plus six years	Reviewed, then securely disposed of
Records relating to the creation and management of parent teacher associations and/or old pupil associations	Current academic year, plus six years	Reviewed, then securely disposed of

10. Storing and protecting information

- The Trust takes its Data Protection duties seriously and any unauthorised disclosure may result in disciplinary action.
- The **Academy Representative in each Academy** will undertake a risk analysis to identify which records are vital to academy management, and these records will be stored in the most secure manner.
- The **Academy Representative in each Academy** will ensure a backup of information is conducted regularly to ensure that all data can still be accessed in the event of a security breach, e.g. a virus, and prevent any loss or theft of data. Where possible, backed-up information will be stored off the premises or in the cloud.

- Confidential paper records should be kept in a locked filing cabinet, drawer or safe, with restricted access.
- Confidential paper records should not be left unattended or in clear view when held in a location with general access.
- Digital data is coded, encrypted or password-protected, both on a local hard drive and on a network drive that is regularly backed up off-site.
- Where data is saved on removable storage or a portable device, the device is kept in a locked and fireproof filing cabinet, drawer or safe when not in use.
- Memory sticks should be avoided where possible and are not used to hold personal information unless they are password-protected and fully encrypted.
- All electronic devices are password-protected to protect the information on the device in case of theft.
- Where possible, the Trust enables electronic devices to allow the remote blocking or deletion of data in case of theft.
- Staff and governors should avoid using their personal laptops or computers for Trust purposes. If personal devices are used staff and governors are expected to follow the same security procedures as for Trust-owned equipment (see ICT Acceptable Use Policyies).
- All members of staff are provided with their own secure login and password, and every computer regularly prompts users to change their password.
- Emails containing sensitive or confidential information are sent via secure email or are password-protected to ensure that only the recipient is able to access the information. The password will be shared with the recipient in a separate email.
- Circular emails to parents are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients.
- Where personal information that could be considered private or confidential is taken off the premises, either in an electronic or paper format, staff take extra care to follow the same procedures for security, e.g. keeping devices under lock and key. The person taking the information from the Trust premises accepts full responsibility for the security of the data.
- Before sharing data, all staff always ensure that:
 - They are allowed to share it.
 - Adequate security is in place to protect it.
 - The Trust Data Protection Policy is being followed
- All staff members will implement a 'clear desk policy' to avoid unauthorised access to physical records containing sensitive or personal information. All confidential information will be stored in a securely locked filing cabinet, drawer or safe with restricted access.

- Under no circumstances are visitors allowed access to confidential or personal information. Visitors to areas of Trust premises containing sensitive information are supervised at all times.
- The physical security of the Trust's buildings and storage systems, and access to them, is reviewed regularly by each **site manager**. If an increased risk in vandalism, burglary or theft is identified, this will be reported to the **Academy Representative** and extra measures to secure data storage will be put in place.
- The **Academy Representative** is responsible for continuity, and recovery measures are in place to ensure the security of protected data.
- Any damage to or theft of data will be managed in accordance with the Trust's Data Protection Policy.

11. Digital continuity statement

Digital data that is retained for longer than six years will be named as part of a digital continuity statement.

The **Academy Representative in each Academy** will identify any digital data that will need be named as part of a digital continuity statement.

The data will be archived to dedicated files on the Trust's servers, which are password-protected – this will be backed-up in accordance with section 10 of this policy.

Memory sticks will never be used to store digital data subject to a digital continuity statement.

On an **annual** basis, the **Trust IT Director** will review the storage methods used to ensure that new technology and storage methods are assessed and, where appropriate, added to the digital continuity statement.

The following information will be included within the digital continuity statement:

- A statement of purpose and requirements for keeping the records
- The names of the individuals responsible for long term data preservation
- A description of the information assets to be covered by the digital preservation statement
- A description of when the record needs to be captured into the approved file formats
- A description of the appropriate supported file formats for long term preservation
- A description of the retention of all software specification information and licence information
- A description of how access to the information asset is to be managed in accordance with the Trust Data Protection Policy.

12. Information audit

Each Academy conducts information audits on an **annual** basis against all information held by the Academy to evaluate the information the Academy is holding, receiving and using, and to ensure that this is correctly managed in accordance with the General Data Protection Regulation (GDPR) and the provisions of the Data Protection Act 2018 (DPA 2018). This includes the following information:

- Paper documents and records
- Electronic documents and records
- Databases
- Microfilm or microfiche
- Sound recordings
- Video and photographic records
- Hybrid files, containing both paper and electronic information

The **Academy Representative in each Academy** is responsible for ensuring the information audit is completed. The information audit will include:

- The Academy's needs
- The information needed to meet those needs
- The format in which it is stored
- How long it needs to be kept for
- Vital records status and any protective marking
- Who is responsible for maintaining the original documents

The **Academy Representative in each Academy** will consult with staff members involved in the information audit process to ensure that the information is accurate.

13. Disposal of data

Where disposal of information is outlined as standard disposal, this will be recycled appropriate to the form of the information, e.g. paper recycling, electronic recycling.

Where disposal of information is outlined as secure disposal, this will be shredded or pulped, and electronic information will be scrubbed clean and, where possible, cut.

Each Academy will keep a record of all files that have been disposed of and/or destroyed detailing WHAT information has been disposed/destroyed, WHEN, by WHOM, and HOW the information has been disposed of/destroyed.

Where the disposal action is indicated as reviewed before it is disposed, the **Academy Representative** will review the information against its administrative value – if the information should be kept for administrative value, a record will be kept of this.

If, after the review, it is determined that the data should be disposed of, it will be destroyed in accordance with the disposal action outlined in this policy.

Where information has been kept for administrative purposes, the **Academy Representative** will review the information again after **three** years and conduct the same process. If it should be destroyed, it will be destroyed in accordance with the disposal action outlined in this policy. If any information is kept, the information will be reviewed every subsequent **three** years.

Where information must be kept permanently, this information is exempt from the normal review procedures.

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City of London Academies Trust

Code of Conduct



Responsibility:	Chief Financial Officer
Updated:	April 2020
Approved by Board:	20 April 2017/July 2020
Next Review Date:	April 2022

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1.0 Introduction

- 1.1 In performing their duties, City of London Academies Trust (CoLAT) employees must act with integrity, honesty, impartiality and objectivity. The public is entitled to expect the highest standards of conduct from all CoLAT employees.
- 1.2 This Code is to be given to existing employees at the start of each academic year and new employees when they commence employment. If employees have any doubts or queries about what is acceptable conduct, or about anything else in this Code, they should, in the first instance, raise these with their direct line manager or the Principal/Headteacher of the academy in which they work.

2.0 Trust Ethos/Vision

- 2.1 The Trust is characterised by:
 - High expectations, aspirations, excellence and a belief that all can succeed
 - Combining creativity, innovation and enterprise, alongside tradition and continuity –
 - Developing people who are confident, resilient, compassionate and democratic
- 2.2 This code of conduct is a set of explicit expectations, based on these characteristics and the Trust's five foundations of excellence:
 - high expectation leadership
 - exemplary behaviour
 - outstanding creative teaching
 - assessment that informs intervention
 - a challenging curriculum.

3.0 The Purpose of the Code and its status

- 3.1 The Code sets out the core values for acceptable standards of behaviour by employees and the consequences of any failure to meet the standards. It aims to ensure:
 - employees are clear about the Trust's standards and expectations of them
 - employees deal appropriately with difficult and/or potentially compromising situation
 - employees recognise their individual, collective and corporate responsibility to promote and encourage high standards of conduct#
 - that the pupils and each academy community receive the best service
 - that each academy community is treated respectfully at all times
 - improved management of the Trust, each academy and its services
- 3.2 The Code sets out the professional standards expected and the duty upon employees to abide by it. All Adults have a duty to keep pupils safe, promote their welfare and, to protect them from radicalisation (the Prevent duty), abuse (sexual, physical and emotional), neglect and safeguarding concerns. This duty is, in part, exercised through the development of respectful, caring and professional relationships between Adults and pupils and behaviour by Adults that demonstrates integrity, maturity and good judgement. Following this Code will help to safeguard Adults from being maliciously, falsely or mistakenly suspected or accused of misconduct in relation to pupils
- 3.3 This Code cannot cover all of the Trust's expectations of its employees. The Trust and each academy could not possibly function without its employees' loyalty, honesty, competence, integrity, professionalism and simple common sense - all these are implicit in the Code.

- 3.4 Principals and Headteachers have a particular responsibility to make sure that employees are aware of the Code and its requirements, including its implications for their duties and that working arrangements, practices and policies support and are compatible with the Code.
- 3.5 The Code forms part of employees' contracts of employment and any breaches of the Code may result in action being taken under the relevant Trust procedures; for example misconduct, criminal convictions, and competence.
- 3.6 In addition to this policy, all staff employed under Teachers' Terms and Conditions of Employment have a statutory obligation to adhere to the 'Teachers' Standards' and, in relation to this policy, Part 2 of the Teachers' Standards - Personal and Professional Conduct.
- 3.6 Employees are expected to comply with the Code in all aspects of their work and in their lives outside work insofar as they may compromise their employment by the Trust.
- 3.7 The Code does not place restrictions on employees' trade union activities, provided that these are reasonable, authorised by senior trade union branch officers, and are within the trade union facilities agreement.
- 3.8 The Code refers to a number of Trust and academy policies and procedures in respect of behaviour and the ways in which employees are required to work. Employees should refer to these for greater details on matters referred to in the Code.

4.0 Who is covered by the Code

- 4.1 The Code applies to all employees of the City of London Academies Trust.
- 4.2 The Trust also expects that anyone it engages or contracts to carry out any of its functions will abide by the spirit of the Code. These include:
 - Trust members
 - Trustees
 - Members of local governing bodies
 - Consultants and their employees
 - Contractors and their employees
 - Employees of other organisations who have been seconded to work for the Trust
 - Agency staff
 - Volunteers and individuals undertaking work placements or apprenticeships or similar roles
- 4.3 In the event that the Code is breached, consideration will be given to terminating, or seeking compensation under the contract or other arrangement between the consultant/contractor/outside organisation and the Trust, and/or referring the matter to the police or other relevant regulatory body, dependent on the circumstances.

5.0 Standards, service delivery and equality

- 5.1 In addition to high levels of performance, a good image is vital for the Trust and each academy so that its residents and businesses can have confidence in the services provided.
- 5.2 As public servants, CoLAT employees have a particular responsibility to look after public resources and property and their conduct inside and outside work must never undermine the trust and confidence the public and the Trust need to have in them to carry out their work properly and conscientiously.

- 5.3 All employees who work in academies set examples of behaviour and conduct which can be copied by pupils/students. All employees must, therefore, demonstrate high standards of conduct in order to encourage our pupils/students to do the same.
- 5.4 Employees are the Trust's "ambassadors". It is Therefore vital, that the public finds them polite, competent, professional, friendly, helpful and trustworthy.

High standards

- 5.5 At all times employees are required to:
- give the highest possible standard of service to the Trust and each academy community and make service delivery their main priority
 - do nothing inside or outside their working hours which could undermine public confidence in them as Trust employees and/or in the Trust
 - work in the best interests of the Trust and the communities it serves
 - do nothing which results in the Trust (or any other public authority) being denied revenue to which it is entitled
 - follow Trust and individual academy policies and procedures, and meet laid down standards

Equality Issues

- 5.6 CoLAT is an equal opportunities service provider and employer. No form of discrimination is tolerated. All CoLAT employees have a responsibility to promote and comply with the Trust's equal opportunities policies and practices and with the requirements of the law.
- 5.7 CoLAT employees are required to:
- make sure that the Trust's equality policies are complied with and carried out.
 - treat all members of the community, parents, pupils and other employees fairly and equally regardless of their sex, race, colour, national or ethnic origin, sexuality, religion, age, disability or marital status
 - assist all members of the community, parents and pupils so that they can benefit from the services on offer
 - never display in the workplace, nor allow others to display, sexist or racist material, or material which would normally be considered offensive.
 - tell their line manager or Headteacher/Principal about anything which may be discrimination, bullying and harassment or victimisation of themselves, colleagues, parents, pupils or members of the community
- 5.8 The Principal/Headteacher in each academy has a particular responsibility for making sure that:
- services are delivered in a manner which effectively meets the Trust's and academy's equality policies and that all groups within the community have equal access
 - employees, pupils and parents can enjoy an environment which is free of any discrimination
 - the Principal/Headteacher is informed about any incidents and/or complaints about discrimination, victimisation, or harassment

Attendance and Punctuality

- 5.9 Employees must report promptly at the appointed time at their designated workplaces, at the start of their working day and after any authorised breaks.

- 5.10 Employees who are prevented from reporting for work because of illness and/or injury must comply with the sickness notification/certification requirements detailed in their contracts of employment, academy policy and/or as directed by their Principal/Headteacher.
- 5.11 Employees must arrive in good time in order to start work promptly. Employees are expected to be punctual in relation to all appointments and engagements unless there are exceptional circumstances. Lateness for appointments with people who do not work for CoLAT reflects badly on the Trust.
- 5.12 Principals/Headteachers must make sure that proper arrangements are in place for employees to record their start and finish times at work and their whereabouts.

Criminal Convictions/ Charges/ Investigations

5.13 CoLAT employees must:

- in line with Keeping Children Safe in Education, show their original DBS certificate to the Trust before they take up post as well as any DBS re-checks required
- keep the Principal/Headteacher of their academy informed of progress if they are investigated and/or charged in connection with a criminal offence
- tell their Principal/Headteacher immediately if they are convicted of any criminal offence, bound over, or cautioned about activities inside or outside work, including road traffic offences which lead to a conviction.

5.14 All CoLAT employees, Trustees and Local Governing Body Members are required to report any criminal activities by colleagues in the course of their tenure with the Trust.

5.15 Dependent on the duties of the post, employees are also required to declare whether they or anyone with whom they share a household, are disqualified from working in, or being concerned in the management of, the early year and later years' settings as defined in the Childcare (Disqualification) Regulations.

5.16 Behaviour at work

5.17 The way employees behave at work directly affects the service, colleagues, the workplace and the public's perception about CoLAT.

5.18 All staff will endeavour to have open, positive, professional working relationships with each other. If disputes occur staff should attempt to communicate concerns openly, honestly and sensitively in a private forum. If no resolution can be found then a further meeting with the support of a colleague, or manager, may be required.

5.19 Employees must always:

- Show respect for the Trust's communities, public and colleagues and behave in a way which cannot reasonably cause offence
- Exercise self-control - never behave in an aggressive and angry manner, nor use foul and abusive language.

Dress

5.20 As part of the ethos of the Trust staff should present a positive and professional image at all times.

- 5.21 The manner in which employees present themselves at work directly affects the Trust's image and should be appropriate for the work they are carrying out for the Trust. Therefore, employees are required to:
- Be clean, tidy, presentable and professional at all times and comply with the requirements of their workplace in relation to appropriate dress for their service and work role
 - always wear uniform or protective clothing if these have been issued, or made available for particular tasks, and make sure that these are clean and in good repair
 - always have regard to the health and safety implications of what they wear e.g. wear protective clothing.
- 5.22 Employees may follow the traditions of their ethnic/cultural/religious background provided they are safe and appropriate to the job.
- 5.23 Employees may be asked to remove excessive piercings or cover tattoos while at work, to promote the ethos of the Trust and each academy and present a positive and professional image to all our students at all times. The Principal/Headteacher will discuss this with the Employee.
- 5.24 The Principal/Headteacher/Line Managers and Middle/Senior Leaders must:
- Explain to all employees the importance of being dressed appropriately i.e. presenting a positive and professional image, as part of creating productive and aspirational work environment
 - Meet with employees if s/he is not dressed in a way which presents a positive and professional image. If this is not resolved satisfactorily, then the Trust/academy may use the disciplinary policy.

Name badges

- 5.25 Employees must always wear their name badge at work, ensuring it is clearly visible at all times.

Driving

- 5.26 Employees who have to drive in the course of their work must:
- always drive courteously and according to the laws and rules of the road
 - always make sure that vehicles are roadworthy, well-maintained, appropriately insured, taxed, and suitable for the purposes for which they are being used
 - immediately advise the Headteacher/Principal/Line manager if they are stopped by the police whilst driving, are involved in a road traffic accident or incurring a parking ticket in the course of their work duties
 - advise their manager of any health issues which may affect their driving

Smoking

- 5.27 All employees are required to comply with the requirements of the law and with the Trust's No Smoking Policy. The legislation makes it illegal to smoke in all public enclosed or substantially enclosed area and workplaces and the Trust's No Smoking Policy also includes vaping and e-cigarettes.

Alcohol, Drugs and Substance misuse

- 5.28 It is the Trust's policy that employees must not consume alcohol or take drugs (other than prescribed or over the counter drug) during working hours (including lunchtimes and other breaks) and must not work under the influence of either of these.

- 5.29 Employees should not present themselves at work drunk or under the influence of alcohol or drugs such that their performance is diminished or otherwise unacceptable. This includes committing a drink or drug offence which could endanger anyone's safety or diminish confidence in the employees' suitability for continued employment.
- 5.30 Employees must consult their GPs for advice on the effects any legal medication may have on their ability to perform or conduct themselves at work, and advise the Principal/Headteacher accordingly.
- 5.31 Employees must inform the Principal/Headteacher if they have genuine reason to believe that a colleague may have an alcohol, drug or substance misuse problem.
- 5.32 Employees must ensure that alcohol is not to be consumed or stored on the school premises unless under the authorisation of the Principal/Headteacher, for example for end of term social events.

Health and safety

5.32 All employees must:

- carry out their work in a safe and proper manner having regard at all times for their own health and safety and that of colleagues and the public
- be familiar with health and safety law, which is displayed in all workplaces, and the Health and Safety Policy of the academy in which they work.
- comply with the health and safety regulations relating to the particular task(s) they are carrying out
- complete the health and safety training applicable to their jobs

5.33 The Principal/Headteacher/ Line Manager must make sure that their employees work in a safe place, with safe methods, and must be familiar with their academy's Health and Safety Policy and their responsibilities within it.

6.0 Communication, internet and social media

- 6.1 All employees must read, understand and follow the Trust's IT Acceptable Use Policy and sign up to the Acceptable Use Agreement
- 6.2 Each academy may have additional email and internet policies and guidelines. Employees must read and sign up to these before they use email and the internet.
- 6.3 Communications may be intercepted where appropriate, in line with Trust policy. This may include monitoring (and recording) of telephones, the internet and e-mail.
- 6.4 E-mail is a quick and effective communication tool, however it must be used professionally and judiciously. E-mail should not be used when the more professional avenue is face to face communication. Whole staff e-mails and 'reply to all' functions should only be used when appropriate. Do not send emails to those who do not require the information. Care must be exercised when using external e-mails to ensure spelling and grammar is acceptable and that the e-mail is always professional and courteous.

Internet, phone and safe computer use

6.5 All employees must:

- Familiarise themselves with the Trust's Acceptable Use Policy

- Take all reasonable steps to prevent students having access to their details on social networking sites, such as Facebook, Twitter, Instagram, Snapchat etc. (this list is not exhaustive)
- Not access Facebook or any other social networking pages of our students or accept students as 'Friends'
- Not make derogatory remarks about the Trust, academy, management, colleagues, pupils, or other members of the academy community, on social networking sites such as Facebook, Twitter, Instagram, Snapchat etc. (this list is not exhaustive)
- Always lock their computer if required to leave the computer unattended; Never leave a logged on computer unattended. Never use a computer that is logged on as someone else
- Not allow students to have access to their mobile phone number or to their mobile phone.
- Not contact students via their mobile phone, but only through their parents' contact details.
- Not use their mobile phone in school other than in the staffroom or office spaces.
- Never give students their personal email address or contact students using their personal email.
- Not use personal phones to discuss matters in relation to students

- 6.6 It is not appropriate to use mobile phones in public areas of any academy. They should only be used in the staff room and in designated staff work bases.
- 6.7 All staff have access to the server and ICT services at their workplace. On logging in, all users agree to accept the Trust Acceptable Use policy. It is important to remember that whatever activity the staff are using ICT for, staff are borrowing school equipment. Each academy will monitor usage and traffic across the system.
- 6.8 Social networking sites and blogging are extremely popular. Staff must not post material which damages the reputation of the Trust or any of the academies or which causes concern about their suitability to work with children and young people. Those who post material which could be considered as inappropriate could render themselves vulnerable to criticism or allegations of misconduct

7.0 Child Protection and Pupil/Student development

- 7.1 It is the responsibility of all employees to safeguard and promote the welfare of children and young people.
- 7.2 The Trust and each academy is committed to providing an environment where children can play, learn, develop and achieve and where they are safeguarded and are enabled to tell or communicate if they are being harmed in some way. The Trust and each academy is committed to ensuring that all staff are sensitive to issues of race, culture, gender and diversity ensuring these issues are never a barrier to sharing and reporting concerns about children.
- 7.3 All Adults working with children have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of pupils. They should adopt high standards of personal conduct in order to maintain the confidence and respect of their colleagues, pupils and the public in general. An Adult's behaviour or actions, either in or out of the workplace, must not compromise her/his position within the work setting, or bring the Trust into disrepute
- 7.4 All employees including, temporary and supply staff, volunteers and staff working on site employed by other services and agencies have a statutory responsibility to safeguard and promote the welfare of children and must be aware of and fully conversant with the relevant Trust and academy policies and procedures (Safeguarding/Child Protection Policy).

- 7.5 All Adults must be familiar with and act in accordance with Part 1 of the most recent update of Keeping Children Safe in Education DfE (statutory), Working Together to Safeguard Children March 2015 HM Government (statutory), Prevent Duty Guidance July 2015 HM Government (statutory), 'The Prevent duty departmental advice for schools and childcare providers' DfE June 2015 and 'Guidance for safer working practice for those working with children and young people in education settings' October 2015 (non statutory).
- 7.6 In all instances where you have a concern about a child's well-being, no matter how trivial you may feel it may be, it is your duty to report this concern in line with the Trust's Safeguarding Policy. If you are unsure who to tell, then see your immediate line manager for guidance.
- 7.7 Employees must not give lifts to students in their car, unless authorised by the Headteacher/Principal.
- 7.8 Employees must never leave students unattended in rooms. Always lock classrooms when you have left the room, and make sure you or an adult is the last to leave. If you discover an unlocked classroom or office, please lock it, and report it to the office.
- 7.9 Employees must only use staff toilets, and students must only use student toilets. Adult visitors must only use the staff toilets, and child visitors must only use student toilets.
- 7.10 Child Protection training will be delivered as part of each academy's training programme and developed to meet the needs of the academy. This will take place at the beginning of each academic year and updates provided accordingly.
- 7.11 Employees must not demean or undermine pupils, their parents or carers, or colleagues.
- 7.12 Employees must take reasonable care of pupils/students under their supervision with the aim of ensuring their safety and welfare.

Pupil/Student development

- 7.13 Employees must comply with Trust and academy policies and procedures that support the well-being and development of pupils/students.
- 7.14 Employees must co-operate and collaborate with colleagues and with external agencies where necessary to support the development of pupils/students.
- 7.15 Employees must follow reasonable instructions that support the development of pupils/students.

Photography and filming

- 7.16 All employees must:
- not take academy equipment, such as cameras, out of school without permission from the Principal/Headteacher/SLT, for example a school trip.
 - be clear about the purpose of the activity and about what will happen to the images when the activity is concluded
 - be able to justify images of children in their possession
 - avoid making images in one to one situations or which show a single child with no surrounding context
 - ensure the child/young person understands why the images are being taken and has agreed to the activity and that they are appropriately dressed.
 - only use equipment provided or authorised by the organisation

- report any concerns about any inappropriate or intrusive photographs found
- always ensure they have parental permission to take and/or display photographs
- never display or distribute images of children unless parent/carer consent has been received
- never use images which may cause distress
- never use mobile telephones to take images of children
- never take images 'in secret', or take images in situations that may be construed as being secretive

Inappropriate teaching material / content

- 7.17 Employees must only show resources which are age appropriate. Employees showing films that are PG or above, must be checked before hand to ensure that the section of the film that is being shown does not include any inappropriate scenes of a violent or sexual nature.
- 7.18 Employees must not allow students to act out / role play / discuss scenarios of a sexual nature or allow students to act out / role play scenes of a violent nature unless as part of a planned lesson and are checked beforehand. Professional judgement must be exercised to ensure the planned lesson, relevant teaching material and methods are age appropriate and checked with the relevant member of the academy leadership team.

Physical contact with students and use of “reasonable force”

- 7.19 In rare circumstances employees may be required to use their professional judgement and exercise physical restraint on a student who is an immediate danger to him/herself or to others.
- 7.20 Employees are expected to be familiar with the relevant academy’s behaviour management policy which must be followed at all times.
- 7.21 Physical restraint must not be used unless absolutely necessary. The types of force which are deemed by the DfE to be reasonable are:
- passive physical contact resulting from standing between two pupils
 - active physical contact such as leading a pupil by the hand or arm; ushering a pupil away by placing a hand in the centre of his/her back; or, in more extreme circumstances, using appropriate restrictive holds.
- 7.22 Employees should not:
- Block door ways or corridors to stop a student leaving unless there is reason to believe the student is about to commit a dangerous act such as harm another student
 - Act in temper (involve another staff member if you fear loss of control)
 - Involve other pupils in the restraint
 - Touch or hold the pupil in sexual areas
 - Twist or force limbs back against a joint
 - Bend fingers or pull hair
 - Hold the pupil in a way which will restrict blood flow or breathing e.g. around the neck
 - Slap, punch, kick or trip up the pupil
- 7.22 If employees have recourse to use physical restraint they must report this immediately to the Principal /Headteacher or another senior member of staff.

8.0 Relationships at work

- 8.1 People who work together often form personal friendships and, in some cases, romantic relationships. While personal friendships at work are generally to be encouraged, a romantic relationship between colleagues who work together can sometimes result in actual or potential difficulties. Where there is the possibility that such a relationship could interfere with an individual's objectivity when making decisions or behaviour at work, the matter becomes the rightful concern of the organisation and the steps outlined below must be taken.
- 8.2 Similar problems can arise if two employees who are related to one another work together, either in the same department or in positions requiring that they liaise and cooperate over work matters and the points below also applies to this circumstance.

Employees' relationships with members of the Trust board or local governing bodies

- 8.3 Where relationships occurs, the employee must bring it to the attention of the Principal/Headteacher/CEO personally and in confidence so that the implications for the Trust and the academy can be discussed and action taken to avoid any difficulties it may present.
- 8.4 Employees must not contact members of the local governing body over the Principal/Headteacher about personal employment issues. They should speak to the Principal/Headteacher/ and go through established procedures such as appraisal, grievance and appeal procedures. Employees can also seek advice from their trade union.

Managers' relationships with their staff member

- 8.5 Where such a relationship occurs, the Principal/ Headteacher/ Line Manager must bring it to the attention of the Principal/ Headteacher to the CEO personally and in confidence so that the implications for the Trust and the academy can be discussed and action taken to avoid any difficulties it may present. This includes segregation of duties.

Relationships between an employee and their child/grandchild

- 8.6 Employees are expected to conduct themselves in a professional, sensitive and confidential manner at all times.
- 8.7 Where a relationship exists between an employee and their child/grandchild (whether a colleague or a child enrolled at the school), the employee must bring it to the attention of the Principal/Headteacher/CEO personally and in confidence so that the implications for the Trust and the academy can be discussed and action taken to avoid any difficulties it may present. This includes segregation of duties.

Conflicts of interest arising from any connection employees or their close relations may have with a contractor/partner

- 8.8 Managers must make sure that ethical standards are embedded in the Trust's relationships with stakeholders, including outside bodies and partners. External suppliers and service providers are required to operate to public sector standards e.g. not offering or providing inappropriate gifts or hospitality to CoLAT employees or members of the Trust Board or local governing bodies.
- 8.9 Contracts must be awarded on merit, by fair competition against other tenderers in accordance with the Trust's Procurement and Tendering Policy, and no special favour must be shown to businesses run by, for example, friends, partners and relatives.

- 8.10 Employees, who have responsibility for engaging or supervising contractors, or have any other official relationship with them, must declare any past or current relationships with them (including private, professional and/or domestic relationships) to the Principal/Headteacher/CEO
- 8.11 Employees must notify their Principal/Headteacher/CEO of any relationship (business or private) they or a close relative may have, or may have had, with an external contractor or potential contractor, so that the implications for the Trust and the academy can be discussed and action taken to avoid any difficulties it may present.

Employees who are unsure whether or not to disclose information

- 8.12 Employees must ask their Principal/Headteacher/CEO for advice if there is any doubt as to whether or not information should be disclosed.

9.0 Selection and recruitment (including equal opportunities) and other employment matters

- 9.1 Employees involved in the recruitment and appointment of employees, must ensure that appointments are made on the basis of merit. In order to avoid any accusation of bias, employees must not be involved in any selection process involving a prospective employee, to whom they are related or with whom they have a close personal relationship outside work.
- 9.2 All appointments must be made on merit and in accordance with the Trust's Safer Recruitment & Selection Policy and Procedures.

Providing references

- 9.3 References given to other employers on behalf of the Trust or any of the academies must be signed by the Principal/Headteacher, or other nominated senior manager, and ideally on school headed paper. Employees may give personal references but these must never be on academy stationery and must not imply that they are references from CoLAT or any of the individual academies - any personal reference must make it clear that it is provided on a personal basis.

10.0 Outside commitments and personal interests

Conflicts of interest between employees' activities outside and inside work

- 10.1 Employees must not allow their private interests or beliefs to conflict with their professional duty.
- 10.2 Employees' off-duty hours are their personal concern, but they must not allow private interests to interfere with their professional duties or put themselves in a position where they may appear to conflict.
- 10.3 Employees must:
- inform the Principal/Headteacher/CEO of any financial and non-financial interest the employee may have, if they think that it might bring about some conflict with their work
 - inform the Principal/Headteacher/CEO of any out-of work activities which interfere with his or her ability to perform his or her professional duties, is not in the Trust's or academy's best interests, undermines public confidence in the Trust's or academy's affairs or might potentially bring the Trust or academy into disrepute;
 - report any family tie, or other relationship, with an organisation (or people who work for that organisation) if the employee, in any way, provides advice to senior management on the

management or funding of that organisation or is involved in the administration of the contract or other arrangement governing the Trust's or academy's relationship with the organisation.

Conduct outside of school hours - propriety and behaviour of staff

- 10.4 All CoLAT staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children and young people. Their conduct inside and outside work must never undermine the trust and confidence the public and the Trust need to have in them to carry out their work properly and conscientiously, they should be aware that behaviour in their personal lives may impact upon their work with children and young people.
- 10.5 This means that staff should not:
- Behave in a manner which would lead any reasonable person to question their suitability to work with children or act as a role model
 - Make or encourage others to make, unprofessional personal comments which scapegoat, demean or humiliate, or which might be interpreted as such
- 10.6 CoLAT has no immediate jurisdiction over the activities that staff undertake outside of school hours and off the premises. However this advice is aimed at minimising the risk of accusations of unprofessional or unsafe conduct. In particular:
- Be aware of the content you post and access on social networking sites such as Facebook. Be aware that content you posted in the past can still be accessed by others and could compromise your integrity
 - be cautious when out socialising in the local area
 - conduct yourself with dignity and propriety on public transport
- 10.7 CoLAT staff are seen as role models for young people, whether we are at work or not. We have a duty to maintain high levels of confidence from the community about our ability to keep children safe and our ability to guide young people to make positive life choices.

11.0 Financial procedures and use of financial resources

- 11.1 Appropriate employees must:
- Ensure that they use any public funds entrusted to them in a responsible and lawful manner
 - always try to obtain value for money and avoid legal challenge to the Trust
 - be conversant with and comply with the Trust's Scheme of Delegation.
- 11.2 Principals/Headteachers/ /Line managers must make sure that their employees are aware of and comply with the financial policies, procedures and regulations of the Trust and the relevant academy. They must ensure that the financial procedures and practices for which they are responsible conform to these regulations and are secure against theft and fraud.

Best value, tendering, outsourcing, partnerships etc.

- 11.3 Employees who are involved in tendering, outsourcing, partnerships, the awarding of contracts, dealing with contractors, etc. must:
- be aware of and follow the Trust's Procurement and Tendering Policy
 - be aware of and follow the procurement rules set out in the relevant academy's procedures

- be clear on the separation of client and service-provider roles
- not disclose confidential information to any unauthorised party or organisation
- exercise fairness and impartiality when dealing with potential service providers
- not show special favour to current or former employees or their partners, friends, relatives, or associates in outsourcing to businesses run by them in a senior or relevant managerial capacity
- discuss any problems with their Headteacher/Principal/CEO if they are unclear whether or not they may be compromised in relation to the awarding of contracts

12.0 School property

12.1 Employees must:

- Only use Trust property, vehicles or other facilities for Trust purposes and according to instructions
- not remove Trust property, including laptops and phones, from school premises unless authorised to do so
- secure Trust property against theft/loss/damage; ensuring that valuable items such as keys, money, credit cards, mobiles, wallets, personal bags, laptops and other valuable items are looked after properly and never left untended even for short periods
- report any theft/loss/damage of Trust property
- never hand school keys or swipe cards to students.

12.2 The loss or theft of any computer or confidential data must be reported immediately to the Principal/ Headteacher/ relevant Line Manager.

12.3 The Headteacher/Principal must inform the Chief Financial Officer of any theft of Trust property and s/he will advise on whether or not the police should be involved.

12.4 The Trust's property includes its "Intellectual property" which includes inventions, creative writings and drawings, including those created by an employee in the course of their duties, in line with contractual terms and conditions..

12.5 The Trust does not accept responsibility for loss of or damage to personal property or Trust property in the care of an individual colleague. Cars, bicycles and other means of personal transport are parked or left on Trust premises at the owner's risk.

13.0 Gifts, rewards and sanctions

13.1 All employees must read and follow the Trust Gifts and Hospitality Policy.

13.2 Although academy staff may receive 'thank you' gifts from pupils at the end of the term, it is serious misconduct for employees to corruptly receive or give any gift, loan, fee, reward or advantage for doing, or not doing, anything in connection with their duties. This also applies to showing favour or disfavour. If it is alleged that an employee has corruptly accepted such a reward it will be for her/him to demonstrate that this is not the case.

13.6 All employees must record any gift or hospitality they are offered or receive in accordance with the Trust Gifts and Hospitality Policy. This includes any gift or hospitality that is declined or donated, for example to fundraising events.

- 13.7 Staff should not solicit or accept any gift, loan, fee, hospitality or other reward which influences the way in which they carry out their duties. They should not influence or be influenced unfairly in the way they carry out their duties by ties of kinship or friendship, or by some other association or loyalty.

14.0 Sponsorship - giving and receiving

- 14.1 Where an outside organisation wishes to sponsor a Trust or academy activity, whether by invitation, tender, negotiation or voluntarily, the basic conventions concerning acceptance of gifts or hospitality apply. Particular care must be taken when dealing with contractors or potential contractors.
- 14.2 Where the Trust or academy wishes to sponsor an event or service no employee nor any partner, spouse or relative must benefit from such sponsorship, directly or indirectly, without there being full disclosure to Principal/Headteacher/CEO of any such interest. Similarly, where the Trust or academy through sponsorship, grant aid, financial or other means, gives support in the community, employees must ensure that impartial advice is given and there is no conflict of interest involved.

15.0 Confidentiality and disclosure of information

- 15.1 Although the Trust and each academy aim to operate in an open and transparent way, some information held by the Trust and each academy is confidential or sensitive and therefore not appropriate to a wide audience and the Trust and each academy may be subject to statutory or common law obligations to keep it confidential. On the other hand the Trust and each academy is also subject to obligations to release information in some circumstances, for example under the Freedom of Information Act.

Employees' responsibilities for confidential information

- 15.2 The Headteacher/Principal of each academy must make sure that they have secure systems in their work place to safeguard confidential information and that employees maintain confidentiality at all times. They must also comply with policies and practices under the Data Protection Act 2018 and the Trust Data Protection Policy.
- 15.3 Employees must:
- be aware of the implications of the Data Protection Act 2018 on the use, maintenance, transfer and disclosure of personal information about employees and the public
 - not disclose any confidential information (including intellectual property) to anyone outside the Trust and make sure that this information is kept securely - this applies while working for the Trust and after they leave
 - not disclose confidential information to colleagues unless there is proper authority
 - take all reasonable steps to protect and safeguard confidential documents etc, particularly if they need to be taken outside the usual workplace

Personal information about colleagues

- 15.4 Employees must keep personal details and work records of other employees confidential, and must not reveal these to third parties without authority, or unless the permission of the employees concerned has been obtained, or where it is required by law.

Giving information to the media

- 15.5 Under no circumstances should employees communicate directly with the media (e.g. national and local papers, press agencies, radio, television stations, professional journals) about their work, or matters concerning the Trust or any individual academy, unless specifically authorised to do so by the Principal/Headteacher/CEO
- 15.6 Employees must refer any approach by the media for an interview, an article and/or comment on CoLAT affairs, to the Principal/Headteacher or the central CoLAT senior management team.
- 15.7 Nothing in these paragraphs prevents senior trade union officials from contacting the media in relation to appropriate trade union activities.

16.0 Malpractice/ fraud/ corruption/ whistleblowing (Public Interest Disclosure Act)

- 16.1 Where an employee becomes aware of activities which that employee believes to be illegal, improper, unethical or otherwise inconsistent with this Code, the employee should report the matter under the Trust's Whistleblowing Policy. This policy sets out the protection available to employees who make disclosures and the protection available under the law.

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No Smoking Policy



Responsibility:	Chief Financial Officer
Approved by Board:	July 2020
Next Review Date:	June 2022

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1. Objectives

City of London Academies Trust (COLAT) academies teach pupils and students about the dangers of smoking and it is therefore important for the Trust and each academy to provide an environment which complements and does not negate this teaching. The Trust and each academy also have a duty to protect the health of students, staff and visitors to the academies.

This policy aims to:

- provide an environment where good health is promoted for all
- demonstrate the Trust's commitment to protect the health of its staff, pupils/students and the communities it serves.
- protect non-smokers from exposure to second-hand smoke.
- educate pupils/students and staff about the health risks of smoking.
- provide support for those who wish to stop smoking
- comply with health and safety legislation, smoke free legislation and employment law.

2. Trust Policy

Smoking is not allowed anywhere on any of COLAT academy sites including toilets, corridors, staff rooms, car parks and playing fields. **Any references to smoking in this policy include tobacco products, e-cigarettes and vaping.**

This policy applies to staff, pupils/students, parents, visitors, governors, trustees, work experience students and contractors when they are on any COLAT academy site. It also applies to all organisations who use the COLAT academy sites at any time.

Compulsory signage is displayed at each COLAT academy, as required by the Health & Safety Act, and to remind visitors of the smoke free policy. All transport provided or contracted by COLAT academies is smoke free and will display the compulsory signage as required by the Health Act.

3. Pupils and students

- Pupils/students are not permitted to smoke while they are on any COLAT academy premises or while they are wearing any COLAT academy uniform travelling to and from any COLAT academy.
- Pupils/students are not permitted to smoke while engaged in academy-related activities outside school hours, including trips
- Smoking cessation advice and support for pupils/students will be provided through the PSHE curriculum.
- Contravention of no smoking rules will be regarded as a breach of discipline and the matter will be dealt with through the normal disciplinary procedures.

4. Staff

- Staff are not allowed to smoke on any COLAT academy premises. Please note any staff member caught smoking is subject to formal disciplinary action taken against them.

- Staff are not allowed to smoke in the presence/sight of pupils/students or near any COLAT academy or whilst in charge of COLAT pupils/students. This includes trips and activities outside academy hours.
- Contravention of the no smoking rules will be regarded as a breach of discipline and the matter will be pursued through the normal disciplinary procedures.

5. Parents and adult helpers

- Parents/adult helpers will be informed of the Trust's no smoking policy when engaged in any in or out of school event, visit, or attendance and will be expected to refrain from smoking during the event.
- Parents will be discouraged from smoking at entrances and exits to COLAT academy sites whilst delivering or collecting their child to avoid portraying smoking as acceptable to children and young people.

6. Visitors, contractors, hirers and other users of COLAT academy sites

- All visitors, including governors, trustees, parents and suppliers will not be permitted to smoke on COLAT academy premises.
- Contractors and users of COLAT academy sites will be informed of the Trust's no smoking policy during the making of arrangements to carry out work or use the academy site.
- Contractors, visitors and users of COLAT academy sites will be discouraged from smoking at exits and entrances to the school grounds, especially in view of pupils/students, in order not to undermine the Trust's no-smoking policy or to portray smoking as acceptable.
- Smoking inside work vehicles on site is not permitted.
- Breaches of the Trust's no-smoking policy by contractors will be reported to the relevant company.
- Persons hiring COLAT academy premises, for any purposes, at any time, will not be permitted to smoke.

7. Securing compliance


- All staff, governors and trustees should be aware of the damage that cigarette smoking and second-hand smoke does to health and of the nature of tobacco addiction.
- The senior leadership team in each COLAT academy will ensure smoking-related topics are adequately and appropriately incorporated into class teaching for each Key Stage.
- Staff are requested not to smoke in view of pupils/students during school hours (or just before/after) even if they are not on any COLAT academy site in order not to portray smoking as acceptable and particularly since they may be viewed as role models by children.
- Details of the NHS Stop Smoking Service will be available to staff who wish to quit smoking.

8. Monitoring, Evaluation and Review

- Senior staff in each COLAT academy senior leadership teams will be responsible for ensuing monitoring compliance with this policy on a day-to-day basis.
- The Principal/Headteacher at each academy will be responsible for compliance with all statutory obligations

Policy for supporting pupils with medical conditions

City of London Academies Trust

	Approval Date:	Monitored By:	Full Review Due:	Review By:
	July 2020	Trustees		Trustees, Local Governing Bodies, employees, pupils, parents/carers

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1. Aims

This policy aims to ensure that:

- Pupils, staff and parents understand how our Trust and each academy will support pupils with medical conditions
- Pupils with medical conditions are properly supported to allow them to access the same education as other pupils, including school trips and sporting activities

2. Legislation and statutory responsibilities

Section 100 of the Children and Families Act 2014 places a duty on the proprietors of academies to make arrangements for supporting pupils with medical conditions. This policy describes how the Trust can meet the needs of children and young people with long-term medical conditions.

It is also based on the Department for Education's statutory guidance: [Supporting pupils at school with medical conditions](#).

This policy also complies with our funding agreements and articles of association.

3. Roles and responsibilities

Trustees will:

- Ensure that arrangements are made to support pupils with medical conditions in line with their duty as 'proprietors' under the Children and Families Act 2014.
- Ensure that there is the appropriate level of insurance and liability cover in place for all Academies.

Governors at each Academy will:

- Ensure the Academy is welcoming and supportive of pupils with medical conditions and provides children with medical conditions with the same opportunities and access to activities as other pupils.
- Ensure no child will be denied admission or prevented from taking up a place in the Academy because arrangements for their medical condition have not been made.
- Ensure that the whole school environment is inclusive and favourable to pupils with medical conditions. This includes the physical environment, as well as social, sporting and educational activities and out-of-school activities
- Make sure all Academy staff understand their duty of care to children and young people in the event of an emergency.
- Ensure that sufficient staff have received suitable training and are competent before they are responsible for supporting children with medical conditions.
- Listen to the views of pupils and parents/carers.

The Senior Leadership Team in each Academy will:

- Make sure all staff are aware of this policy and understand their role in its implementation
- Ensure that there is a sufficient number of trained staff available to implement this policy and deliver against all individual healthcare plans (IHPs), including in contingency and emergency situations
- Take overall responsibility for the development of IHPs
- Ensure that systems are in place for obtaining information about a child's medical needs and that this information is kept up to date
- Ensure all staff understand their duty of care to children and young people in the event of an emergency

- Ensure staff receive training on the impact medical conditions can have on pupils and are trained in what to do in an emergency for children with medical conditions at the Academy.
- Ensure this policy is supported by a clear communication plan for staff, parents/carers and other key stakeholders to ensure its full implementation in the Academy
- Ensure pupils, parents/carers, relevant local healthcare staff, and other external stakeholders are informed of and reminded about the medical conditions policy through clear communication channels.
- Work in partnership with and seek feedback from key stakeholders including pupils, parents/carers, school healthcare professionals, specialist nurses and other relevant healthcare professionals, Academy staff, and local emergency care services.
- Where a child is returning to school following a period of hospital education or alternative provision (including home tuition), work with the local authority and education provider to ensure that the child receives the support they need to reintegrate effectively.
- Keep in touch with a child when they are unable to attend school because of their condition.
- Not penalise pupils for their attendance if their absences relate to their medical condition.
- Review all medical emergencies and incidents to see how they could have been avoided and change Academy procedures according to these reviews.
- Ensure that pupils' confidentiality is protected.
- Nominate a named member of staff responsible for the implementation of this medical conditions policy in the Academy

Each academy will have a named person with responsibility for implementing this policy. The named member of staff in each Academy will:

- Work in partnership with and seek feedback from key stakeholders including pupils, parents/carers, school healthcare professionals, specialist nurses and other relevant healthcare professionals, Academy staff, and local emergency care services.
- Ensure all children with a medical condition have an individual healthcare plan (IHP) which should be drawn up with input from the child (if appropriate) their parent/carer, relevant Academy staff and healthcare professionals
- Ensure IHPs are regularly reviewed, at least every year or whenever the pupil's needs change.
- Ensure the Academy has clear guidance about record keeping including IHP records and accurate records of all medication administered, including the dose, time, date and supervising staff.
- Ensure the Academy has clear guidance on the storage of medication and equipment on site and on trips.
- Ensure the Academy has clear guidance on providing care and support and administering medication at school.
- Ensure that there is more than one member of staff who have been trained to administer the medication and meet the care needs of an individual child and ensure that there are sufficient numbers of staff trained to cover any absences, staff turnover and other contingencies.
- Ensure procedures are in place so medication (prescription or non-prescription) is not given to a child under 16 without a parent's written consent except in exceptional circumstances.
- Ensure that a trained member of staff is available to accompany a pupil with a medical condition on an off-site visit, including overnight stays.
- Where a child is returning to school following a period of hospital education or alternative provision (including home tuition), work with the local authority and education provider to ensure that the child receives the support they need to reintegrate effectively.
- Refer pupils with medical conditions who are finding it difficult to keep up educationally to the SENCO/ALNCO/Special Educational Needs Advisor who will liaise with the pupil (where appropriate), parent and the pupil's healthcare professional.

All staff in each Academy will:

- Read, understand and support this policy.
- Attend relevant training as directed.
- Ensure they understand their duty of care to children and young people and know what to do in the event of an emergency.
- Ensure they understand that certain medical conditions are debilitating and potentially life threatening, particularly if poorly managed or misunderstood.
- Ensure they understand the medical conditions that affect pupils at the Academy and understand that all children with the same medical condition will not have the same needs.
- Ensure they understand the importance of medication and care being taken as directed by healthcare professionals and parents/carers.
- Ensure they understand what to do in an emergency for children with medical conditions at the Academy.
- Ensure they understand the Academy's general emergency procedures, and receive timely training updates
- Be aware of the potential social problems that pupils with medical conditions may experience and use this knowledge, alongside the Academy's anti-bullying policy, to help prevent and deal with any problems.

Pupils

Pupils with medical conditions will often be best placed to provide information about how their condition affects them. Pupils should be fully involved in discussions about their medical support needs and contribute as much as possible to the development of their IHPs. Pupils will:

- Comply with their IHPs.
- Ensure they understand what to do in an emergency.
- Not misuse their medication, or anyone else's.

Parents/carers will:

- Provide the Academy with all required information about any medical conditions their child may have and let the Academy know immediately if their child's needs change.
- Work in partnership with all relevant parties including the Trust, the Local Governing Body, Academy staff and healthcare professionals to help implement this policy
- Work with the Academy and healthcare professionals in drawing up an IHP if required.
- Carry out any action they have agreed to as part of the implementation of the IHP e.g. provide medicines and equipment
- Keep in touch with the Academy when their child is unable to attend school because of their condition.

4. Equal opportunities

Our Trust and each academy are clear about the need to actively support pupils with medical conditions to participate in school trips and visits, or in sporting activities, and not prevent them from doing so.

Each academy will consider what reasonable adjustments need to be made to enable these pupils to participate fully and safely on school trips, visits and sporting activities.

Risk assessments will be carried out so that planning arrangements take account of any steps needed to ensure that pupils with medical conditions are included. In doing so, pupils, their parents and any relevant healthcare professionals will be consulted.

5. Individual healthcare plans

Plans will be reviewed at least annually, or earlier if there is evidence that the pupil's needs have changed. Plans will be developed with the pupil's best interests in mind and will set out:

- What needs to be done
- When
- By whom

Not all pupils with a medical condition will require an IHP. It will be agreed with a healthcare professional and the parents when an IHP would be inappropriate or disproportionate. This will be based on evidence. If there is not a consensus, the headteacher will make the final decision.

Plans will be drawn up in partnership with the school, parents and a relevant healthcare professional, such as the school nurse, specialist or paediatrician, who can best advise on the pupil's specific needs. The pupil will be involved wherever appropriate.

IHPs will be linked to, or become part of, any statement of special educational needs (SEN) or education, health and care (EHC) plan. If a pupil has SEN but does not have a statement or EHC plan, the SEN will be mentioned in the IHP.

The level of detail in the plan will depend on the complexity of the child's condition and how much support is needed. The named person will consider the following when deciding what information to record on IHPs:

- The medical condition, its triggers, signs, symptoms and treatments
- The pupil's resulting needs, including medication (dose, side effects and storage) and other treatments, time, facilities, equipment, testing, access to food and drink where this is used to manage their condition, dietary requirements and environmental issues, e.g. crowded corridors, travel time between lessons
- Specific support for the pupil's educational, social and emotional needs. For example, how absences will be managed, requirements for extra time to complete exams, use of rest periods or additional support in catching up with lessons, counselling sessions
- The level of support needed, including in emergencies. If a pupil is self-managing their medication, this will be clearly stated with appropriate arrangements for monitoring
- Who will provide this support, their training needs, expectations of their role and confirmation of proficiency to provide support for the pupil's medical condition from a healthcare professional, and cover arrangements for when they are unavailable
- Who in the school needs to be aware of the pupil's condition and the support required
- Arrangements for written permission from parents and the headteacher for medication to be administered by a member of staff, or self-administered by the pupil during school hours
- Separate arrangements or procedures required for school trips or other school activities outside of the normal school timetable that will ensure the pupil can participate, e.g. risk assessments
- Where confidentiality issues are raised by the parent/pupil, the designated individuals to be entrusted with information about the pupil's condition
- What to do in an emergency, including who to contact, and contingency arrangements

6. Managing medicines

Each academy will have procedures for managing, storing and administering medicines.

7. Emergency procedures

Staff will follow the school's normal emergency procedures (for example, calling 999). All pupils' IHPs will clearly set out what constitutes an emergency and will explain what to do.

8. Training

Staff who are responsible for supporting pupils with medical needs will receive suitable and sufficient training to do so.

The training will be identified during the development or review of IHPs. Staff who provide support to pupils with medical conditions will be included in meetings where this is discussed.

Training will be kept up to date.

Training will:

- Be sufficient to ensure that staff are competent and have confidence in their ability to support the pupils
- Fulfil the requirements in the IHPs
- Help staff to have an understanding of the specific medical conditions they are being asked to deal with, their implications and preventative measures

All staff will receive training so that they are aware of this policy and understand their role in implementing it, for example, with preventative and emergency measures so they can recognise and act quickly when a problem occurs. This will be provided for new staff during their induction.

9. Record keeping

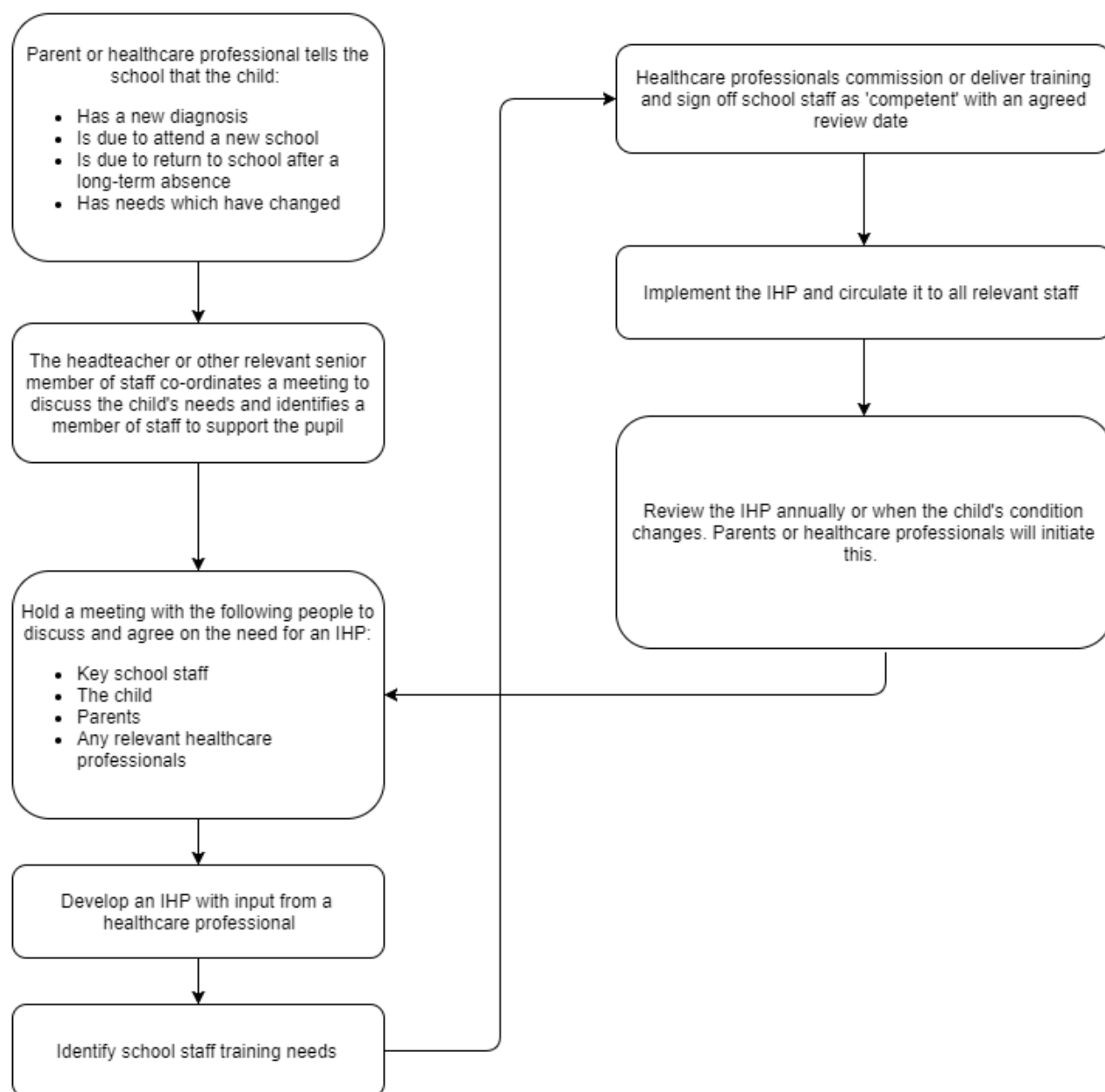
Each academy will have procedures in place for record keeping and access to IHPs

10. Links to other policies

This policy links to the following policies:

- Trust Safeguarding Policy
- Trust Data Protection Policy
- Individual academy policies including:
 - Accessibility plan
 - Complaints
 - First aid
 - Health and safety
 - Special educational needs information report and policy
 - Individual Academy Procedures for e.g. administering and storing medicines, educational visits, risk assessments

Appendix 1: Being notified a child has a medical condition



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Committees City of London Academies Trust	Dates 09/07/2020
Subject: City of London Academies Trust, Academies Development Programme – Update	Public
Report of: Andrew Carter, Director of Community and Children’s Services	For Decision
Report author: Gerald Mehrtens, Director of Academy Development, Department of Community and Children’s Services	

Summary

This report is to update the Board on the progress in the Academies Development Programme, through the City of London Corporation’s (CoLC) sponsorship of the City of London Academies Trust (CoLAT).

Since September 2016, the number of sole sponsored academies has increased from two to eight academies by a mixture of Free School applications and academy conversions. All 6 of these academies have capital developments of either new builds or refurbishment of existing buildings, with a projected total capital investment presently of circa £80m. **Appendix 1 (Non-Public)** gives an overview of the capital build programme for academies along with the body of this report providing details of any current delays.

On 19 March 2020, CoLAT Directors/Trustees approved the transfer of The City Academy, Hackney (TCAH) and the City of London Academy Islington (COLAI) to the City of London Academies Trust (CoLAT). In addition, on 16 January 2020 Members of the Education Board supported the recommendation to the expansion of CoLAT by the transfer of TCAH and COLAI to CoLAT, consent being required from the CoLC under the CoLAT/CoLC Sponsorship Agreement.

This report updates the Board on the progress of this transfer and seeks the necessary approvals to accept the transfer of COLAI and TCAH to CoLAT by 1 September 2020.

Recommendations

Members are asked to:

- Note the progress of academy capital builds, a summary of which is attached as **Appendix 1 (Non-Public)**;
- Note the Legal Due Diligence reports for the City of London Academy Islington (COLAI) and The City Academy Hackney (TCAH) to inform the CoLAT Board of Directors’/Trustees’s decision to transfer these academies undertakings into CoLAT, attached as **Appendices 2 & 3 (Non-Public)**;

- Approve the necessary resolutions to accept the transfer of the COLAI and TCAH undertakings to CoLAT by 1 September 2020, attached as **Appendices 4 & 5**;
- Approve the proposed membership of the new COLAI and TCAH Local Governing Bodies (LGBs), which will be outside the 'model' for CoLAT LGBs as previously endorsed by the City of London Corporation; and approve the appointment of the Chair of governors for each LGB in case, attached as **Appendices 6 & 7**, (subject to the decision of the CoLC Education Board); and,
- Agree that City, University of London in respect of COLAI, and KPMG in respect of TCAH, should continue as 'Strategic Partners' to these academies after the undertakings are transferred to CoLAT, to delegate authority to the Chief Executive Officer [in consultation with the Chairman and Deputy Chairman of the CoLAT Board]; to negotiate and agree the terms of the Memorandum of Understanding, and to sign the document, in each case on behalf of the City of London Corporation **Appendices 8 & 9 (Non-Public)**. This being subject to the decision by the CoLC Education Board

Main Report

Background

1. Under the Academies Development Programme, the number of sole sponsored City academies has increased from two to eight since September 2016, with the date of openings listed below.

• Galleywall Primary, City of London Academy	September 2016
• City of London Primary Academy Islington	September 2017
• City of London Academy Highgate Hill	September 2017
• City of London Academy Shoreditch Park	September 2017
• City of London Academy Highbury Grove	November 2017
• Newham Collegiate Sixth Form, City of London Academy	January 2018
2. On the 17 May 2018, the CoLC Education Board reiterated its decision of March 2016, to limit the sponsor exposure through the expansion of the CoLAT to a maximum of 12 schools in the next few years. On 16 January 2020, Members of the Education Board supported the recommendation to the expansion of CoLAT by the transfer of TCAH and COLAI to CoLAT, consent required from the CoLC under the CoLAT/CoLC Sponsorship Agreement.
3. On 29 March 2019, the CoLAT Board approved a strategy of expansion to a maximum of 12 schools with 3 priorities, Priority 1 being CoLC co-sponsored academies joining CoLAT either through full or associate membership. On 19 March 2020, Trustees approved the City transfer of The City Academy, Hackney (TCAH) and the City of London Academy Islington (COLAI) to the City of London Academies Trust (CoLAT)

Current Position

4. Regarding the academy capital builds, present projections show circa £80m investment across the six schools from a variety of funding sources, notably the Department for Education (DfE), LB Hackney, and LB Islington. This figure does not include the significant amounts associated for temporary accommodation. Members will note two of the capital builds (COLA Highbury Grove and Galleywall Primary) have completed, two are under construction (COLA Shoreditch Park & COLPAI), and two are in the early stages of design (Newham Colligate Sixth Form & COLA Highgate Hill). Attached as **Appendix 1 (Non-Public)** is a table showing an overview of the capital build programme for academies as well as a summary below of key dates, potential risks, and next steps.
5. There are two key areas of risk in the academy capital builds:
 - a. For COLPAI, In March this year the Government introduced 'lockdown' restrictions in response to the Coronavirus crisis which required businesses to either close or implement Public Health England social distancing procedures, in order to continue to operate. The result of this was ISG, the contractor for the school build, had to stop work on the site for a period of time in order to introduce social distancing procedures and additional welfare facilities, and now continues to operate with a reduced workforce on site in order to maintain these requirements. This has further delayed completion of the build. Until social distancing requirements are lifted the actual completion date for the school build will be difficult to confirm but the delays caused to date already take completion into the Spring Term. ISG have now completed their projection of the school and residential completion dates based on maintaining productivity at 80% for the remaining duration of the project which projects the completion of the build in May 2021. The temporary school site from September 2020 is Copenhagen Primary School which has been secured for the whole 2020/2021 academic year should it be needed for a longer period. Officers plan meetings with CoLC and CoLAT members of relevant committees to keep members updated.
 - b. For NCS, following completion of the feasibility study and the recognition that the scheme will not be able to achieve planning approval in its current form, the DfE technical advisors have appointed a more specialist architectural practice ahead of procuring a main building contractor. The design has progressed to the completion of Stage 2 of the RIBA design process with a full planning application projected to be submitted in August 2020. The DfE will attempt to complete the first phase ready for occupation by September 2022, but the complete works could well run until December 2022 or early 2023
6. Regarding the COLAI and TCAH transferring to the CoLAT, this remains on schedule to be completed by 1 September 2020, for the start of the next academic year. Through the work of the two respective Project Boards the legal due diligence exercises have been completed and are attached to this report to inform the Board's decision making as **Appendices 2 & 3 (Non-Public)**. Stakeholder and TUPE consultations have also been concluded on schedule, with the jointly appointed solicitors, Bates Wells, in the process of finalising the transfer of the

leases, Supplementary Funding Agreements, and Commercial Transfer of Assets from the existing academies to CoLAT.

Proposal

7. This report is seeking the Board to pass resolutions to accept the transfer of the City of London Academy Islington (COLAI) and The City Academy Hackney (TCAH) to COLAT on 1 September 2020, attached as **Appendices 4 & 5**.
8. It should be noted, given the target is to transfer both academies to CoLAT by the start of the next academic year and the Department for Education will wish for the relevant documents to be signed towards the end of August 2020, these resolutions are seeking to authorise the CoLAT Chief Executive Officer to agree the final form of the legal documents on behalf of the Trustees on the advice of COLAT's lawyers Bates Wells, which also require approval of the CoLC as sponsor.
9. This report is also seeking the Board's approval of the proposed membership of the new COLAI and TCAH Local Governing Bodies (LGBs) which will be outside the 'model' for CoLAT's LGBs governing bodies as previously endorsed by the City of London Corporation; and approve the appointment of the Chair of Governors for each LGB in case, attached as Appendices 6 & 7, in order to retain the expertise, knowledge, and strong governance arrangements in the transition of these academies to CoLAT. This also being subject to the approval of the CoLC as sponsor.
10. To Inform the Board in making these decisions, attached to this report as **Appendices 2 & 3 (Non-Public)** are the Legal due diligence reports carried out by Bates Wells on the two academies.
11. This report is also seeking approval of the CoLAT Board that City, University of London in respect of COLAI, and KPMG in respect of TCAH, should continue as 'Strategic Partners' to these academies after the undertakings are transferred to CoLAT. Both these organisations are committed to continue a level of support similar to their involvement as co-founder sponsors when these academies were established, which is outlined in draft in **Appendices 8 & 9 (Non-Public)**, with the final agreements to be negotiated by the CoLAT CEO on behalf of CoLAT, and the Director of Community and Children's Services on behalf of CoLC as sponsor.

Strategic Implications

12. All free schools are funded directly by the Education and Skills Funding Agency, with any 'new' academies joining CoLAT requiring 'new' Supplementary Funding Agreements falling within a CoLAT Master Funding Agreement.
13. 12. There is no direct financial liability to the CoLC in respect to the CoLC co-sponsored academies joining CoLAT as the proposed schools would become part of CoLAT, which is a separate legal entity (being a charitable company limited by guarantee). However, the CoLC remains accountable to the DfE as sponsor for the on-going successful operation of CoLAT and the delivery of high-quality education

at each of the academies sponsored by the CoLC, and this will be of strategic importance to the CoLC.

14. This proposal delivers on the following strategic objectives of the CoLC:
- a. To contribute to the outcomes within the CoLC's Corporate Plan to 'Promote effective progression through fulfilling education and employment', and 'to contribute to a flourishing society' as its aim;
 - b. The CoLC Education Strategy for pupils in the City family of schools to have access to transformative education, enabling to achieve their potential, flourish and thrive.
 - c. The Department of Community and Children's Services Business Plan's priority objective 'Potential', which states: "People of all ages can achieve their ambitions through education, training and lifelong learning", with the outcome to be achieved by "Delivering an outstanding education offer through the City of London family of schools

Conclusion

15. TCAH and COLAI are the only two of ten academies sponsored by the City of London Corporation which are not within the City of London Academies Trust. These academies joining CoLAT by September 2020 will enable the benefits provided by the existing co-sponsors to be retained while also gaining the economies of scale, support and expertise the trust offers.
16. The academy development programme through the CoLC's sponsorship of CoLAT continues to be an ambitious expansion of the City's support for education consistent with the CoLC's commitment in its Education Strategy. These ambitions remain consistent with those of CoLAT and are being successfully progressed as noted in this report. Members will particularly note the continued challenges for the COLPAI build, arrangements for further temporary accommodation, as well as the measures in place to keep relevant members updated.

Appendices

- Appendix 1 - CoLAT Capital Builds table – Updated June 2020 (Non-Public).
- Appendix 2 - Legal Due Diligence reports for COLAI (Non-Public)
- Appendix 3 - Legal Due Diligence reports for TCAH (Non-Public)
- Appendix 4 - Resolutions to accept the transfer of COLAI to CoLAT.
- Appendix 5 - Resolutions to accept the transfer of TCAH to CoLAT.
- Appendix 6 – Proposed COLAI governing body transferring to CoLAT.
- Appendix 7 – Proposed TCAH governing body transferring to CoLAT
- Appendix 8 – Proposed continuing support from City, University of London, to COLAI after transfer to CoLAT [draft] (Non-Public).
- Appendix 9 – Proposed continuing support from KPMG to TCAH after transfer to CoLAT [draft] (Non-Public)

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Resolutions pertaining to the transfer in of COLAI to the City of London Academies Trust

The Trustees, having considered the best interests of their staff and beneficiaries and the advantages of including the academy, City of London Academy, Islington (“**COLAI**”), within City of London Academies Trust (“**COLAT**”), and having satisfied themselves that:

- due diligence investigations thought necessary on City of London Academy Islington Limited’s standing as a suitable academy trust from which to accept a transfer of its undertaking have been conducted, and
- that all appropriate revised governance arrangements for COLAI will be in place,

RESOLVE to accept the transfer of COLAI from City of London Academy Islington Limited to COLAT on 1 September 2020 (or such other date as COLAI and COLAT may agree with the Department for Education) subject to:

- (i) the approval of the Department for Education/ESFA being given to the Deed of Novation and Variation and the new Supplemental Funding Agreement for COLAI; and
- (ii) the legal documents required to give effect to the transfer being finalised, agreed and executed;

by 1 September 2020,

and accordingly the Trustees:

- (a) authorise the Chief Executive, Mark Emmerson, to agree the final form of the legal documents on behalf of the Trustees on the advice of COLAT’s lawyers Bates Wells;
- (b) confirm their authorisation for the entry into of all documents necessary to give effect to the transfer of COLAI into COLAT on 1 September 2020, including the Deed of Novation and Variation and Supplemental Funding Agreement referred to above, the commercial transfer agreement and the property transfer documents;
- (c) authorise the execution of all legal documents by authorised signatories on behalf of the Trustees; and
- (d) authorise Bates Wells Braithwaite to complete the documentation on or before 1 September 2020.

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Resolutions pertaining to the transfer in of TCAH to the City of London Academies Trust

The Trustees, having considered the best interests of their staff and beneficiaries and the advantages of including the academy, The City Academy, Hackney (“**TCAH**”), within City of London Academies Trust (“**COLAT**”), and having satisfied themselves that:

- due diligence investigations thought necessary on The City Academy Hackney’s standing as a suitable academy trust from which to accept a transfer of its undertaking have been conducted, and
- that all appropriate revised governance arrangements for TCAH will be in place,

RESOLVE to accept the transfer of TCAH from the academy trust, The City Academy Hackney, to COLAT on 1 September 2020 (or such other date as The City Academy Hackney and COLAT may agree with the Department for Education) subject to:

- (i) the approval of the Department for Education/ESFA being given to the Deed of Novation and Variation and the new Supplemental Funding Agreement for TCAH; and
- (ii) the legal documents required to give effect to the transfer being finalised, agreed and executed;

by 1 September 2020,

and accordingly the Trustees:

- (a) authorise the Chief Executive, Mark Emmerson, to agree the final form of the legal documents on behalf of the Trustees on the advice of COLAT’s lawyers Bates Wells;
- (b) confirm their authorisation for the entry into of all documents necessary to give effect to the transfer of TCAH into COLAT on 1 September 2020, including the Deed of Novation and Variation and Supplemental Funding Agreement referred to above, the commercial transfer agreement and the property transfer documents;
- (c) authorise the execution of all legal documents by authorised signatories on behalf of the Trustees; and
- (d) authorise Bates Wells Braithwaite to complete the documentation on or before 1 September 2020.

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The City of London Academy Islington - Proposed Governing Body as part of COLAT

Elections will be held for the vacant parent governor positions at the start of the year.
The same applies to the second staff governor.

One of the co-opted positions has been used to include a Saddlers' governor, a very valuable relation, and Principal is in discussing for filling this vacancy. However, it may turn out that it does not need a position on the governing body, as long as the governing body can maintain the strength of the relationship in other ways. The other co-opted position has been useful in the past to involve people for various reasons, but there are no current plans to fill it.

This is larger than the 'model' governing body for CoLAT, but there very strong feeling of the COLAI governors and Principal is that the make-up of the governing body should retain the expertise, knowledge, and strong governance arrangements presently in place. It is always difficult to get 3 (non-staff, non-parent) governors together for the governor panels, especially given the work commitments that many governors have which usually rule them out from doing these. Hence having 8 "sponsor" governors has been essential for the operation of these.

	Term Start	Term End
Sponsor governors		
Henry Colthurst (City of London)	01 Sep 2019	31 Aug 2023
Ms Reema Khan (City, University of London)	01 Sep 2020	20 May 2024
Judge Philip Katz (City of London)	01 Sep 2017	31 Aug 2021
Ms Natasha Lloyd-Owen (City of London)	12 Mar 2019	11 Mar 2023
Ms Hafiza Patel (City, University of London)	01 Sep 2020	31 Aug 2024
Professor Sanowar Khan (City, University of London)	01 Sep 2020	31 Aug 2024
Russell Willmer (City of London)	01 Sep 2017	31 Aug 2021
Mr Ronald Zeghibe (City, University of London)	01 Sep 2017	31 Aug 2021
Community governors		
Eric Sorensen	01 Oct 2018	30 Sep 2022
Staff governors		
Ms Ruth Johal	10 Feb 2020	31 Aug 2023
Vacancy (1)		
Parent governors		
Vacancy (2)		
Co-opted governors		
Vacancy (2)		
Local Authority Governors		
Vivien Cutler	01 Sep 2019	31 Aug 2023
Principal		
Sonia Jacob		

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The City Academy Hackney - Proposed Governing Body as part of COLAT

Background

The template COLAT governing body consists of 12 members:

- 2 Parents
- 2 Staff (one teaching, one non-teaching)
- 1 Principal
- 7 COL appointees

COLAT have confirmed that the above template is a starting point only and that some schools within the MAT have adopted variations on this.

KPMG has committed to providing two governors for at least two further academic years.

The Mayor of Hackney has written to the CEO of COLAT, and the existing Chair of Governors, requesting that both Hackney Council and HLT are represented on the governing body. The Chair of Governors at Shoreditch Park has confirmed that school currently has one governor from HLT and that he is aiming to appoint a council member in future.

TCAH current governing body structure consists of up to 21 individuals and currently has 18 (current vacancies for 1 each parent, KPMG and co-opted governors)

The government consider that a governor should serve no more than 8 years at the same school. TCAH have quite a number of governors who have already served more than this and one who will have served 8 years in April.

Recommended Principles

It is recommended that the LGB:

1. Accommodate the Mayor of Hackney's request as we consider it best practice and helpful to the school to maintain strong positive contact with Hackney, but that we make it clear we expect all governors to attend PDCs and be a Link Governor as well as attending governing body meetings;
2. Aim to be consistent with Shoreditch Park as it is also a Hackney school;
3. Retain the two governors KPMG are offering;
4. Meet the government recommendation of having no governors who have served more than 8 years following transition.

As we also want to ensure continuity over the transition it is recommended that Dawn Elliott and Rita Krishna are retained as governors for a further year following joining COLAT despite the fact that both have served more than eight years.

Outcome

If the above principles are followed TCAH would end up with 14 governors in the short term, reducing to 12 thereafter which would consist of:

- 2 Parents
- 2 Staff
- 1 Principal
- 2 Hackney/ community
- 2 KPMG
- 3 City

12 Total – per standard

The table below sets out how long everyone has been a governor and proposal for who moves and who stays. The proposals are based on the following assumptions:

- Keeping all staff and parent governors. If any want to step down the GB will need to have elections in any event but we currently have the correct numbers and none have served eight years;
 - Anuja and Anne wanting to step down due to other commitments;
 - Amanda and Sheila wanting to step down due to passage of time (both will have served 8 or more years shortly);
 - Keeping Dawn and Rita as “founder governors” for continuity with Dawn remaining as Chair until the end of her current term in September 2021;
 - Anant holding a “City” place until the end of his term in 2022 bringing continuity and finance to the table.
- The proposal also gives a good range of skills. 2 accountants, 1 solicitor, 1 marketing and several with education background of some kind.

The City Academy Hackney - Proposed Governing Body as part of COLAT

Governor	Companies House Appointment Date	Assumed End Date (4 year terms)	Years served	Remain	Type	Reason
Oleander Agbetu	12-Jul-17	12/07/2021	2.6	Y	Parent 1	
Anntoinette Bramble, Cllr	01-Sep-14	01/09/2022	5.4	Y	Hackney 1	
Tijs Broeke	12-Jul-17	12/07/2021	2.6	Y	City 1	
Dawn Elliott appointed as D Brook (Chair)	26-Sep-07	26/09/2023	12.4	Y	KPMG 1	Continuity
Amanda Brown	20-Apr-12	20/04/2020	7.8	N		> 8 years - expressed wish to step down
Anuja Dhir	03-Feb-17	03/02/2021	3.0	N		Expressed wish to step down
Mark Essex	27-Sep-17	27/09/2021	2.4	Y	KPMG 2	
Anne Fairweather	28-Sep-16	28/09/2020	3.4	N		Expressed wish to step down
Tamas Kiss	01-Oct-18	01/10/2022	1.4	Y	Staff 1	
Rita Krishna Cllr	11-Nov-08	11/11/2020	11.3	Y	Additional	Continuity
Nina Kuh	01-Oct-19	01/10/2023	0.4	Y	Staff 2	
Mark Malcolm	01-Sep-16	01/09/2020	3.4	Y	Principal	
Sheila Scales	20-May-08	20/05/2020	11.8	N		> 8 years - expressed wish to step down
Anant Suchak	30-Apr-14	30/04/2022	5.8	Y	City 2	Continuity
Stephen Webster	10-Nov-15	10/11/2023	4.3	Y	Parent 2	
Katherine Loven appointed as K Dowbiggin	06-Nov-08	06/11/2020	11.3	N		> 8 Years - agreed to step down. May move to another MAT school to keep knowledge in future
Darren Thompson	2019		<1	Y	City 3	
Roisin Starkey	2019		<1	Y	KPMG 3	
Total	18			13		

Committee:	Date:
City of London Academies Trust Board of Trustees	9 July 2020
Subject: School Places Demand Projections	Public
Report of: Director of Community and Children's Services	For Information
Report author: Gerald Mehrtens, Director of Academy Development, Department of Community and Children's Services	

Summary

This report is to inform Members of the projected levels of demand for school places across the London local authorities where there are City of London Corporation (CoLC) sponsored academies since it was last reported to this committee in July 2018. These projections are based on the relevant Greater London Authority (GLA), and London local authority data.

Demand for school places in London reached record levels over the past decade with London experiencing the biggest rise in pupil numbers in the country between 2010/11 and 2017/16. However, since 2016 the Greater London Authority's (GLA) estimates for future populations in London show a lower rate of increase than estimated in previous years and in some areas, a significant decline.

In terms of primary school places, across London the demand is expected to peak by 2022/23 overall and then projected to decline in future years. However, for the geographical planning areas in Islington and Southwark, where the City sponsors three primary academies, there is predicted potential increased demand in future years, reflecting the proposed housing developments in progress or being developed in those areas.

In terms of secondary school places, the previous growth at primary schools over the last decade is now feeding through to secondary schools. The London boroughs where the City sponsors academies show there is sufficient school places for pupils, and where there is excess of supply local authorities have worked with schools to reduce their Pupil Admission Numbers (PAN) to reflect the demand. As part of their statutory duty to ensure sufficient school places, London boroughs will continue to monitor this and have discussions with relevant schools accordingly.

In addition to levels of demand for primary and secondary school places in areas relevant to City sponsored academies, ultimately parental preference will dictate if all places are filled in these schools. Attached to this report as Appendix 2 shows all City sponsored academies, where the data has been made available, will fill all available places within 1st and 2nd preferences, and for a number of schools from 1st choice preferences.

Recommendation(s)

The Board is asked to:

- Note the demand for school places for Primary and secondary schools in relation to existing City of London academies, and potential further academy expansion.

Main Report

Background

1. Local authorities have a statutory duty to ensure there is sufficient school places and that places are planned effectively. London had seen rapid growth in the number of children living in the city over the last decade. Between 2001/2 and 2011/12, annual births in London rose by almost 30,000 (28 per cent), with many individual authorities seeing much larger increases. The financial crisis of 2008 had a dramatic impact on London's patterns of migration. Outflows from London to the rest of the UK fell sharply in the aftermath of the crisis, with young families moving to the surrounding counties particularly affected. The combined impact of these factors was a rapid growth in the number of children living in the city. This growth put immediate pressure on primary school places, necessitating a huge expansion in capacity.
2. However, since 2016 the Greater London Authority's (GLA) estimates for future populations in London show a lower rate of increase than estimated in previous years and in some areas a significant decline. Many inner London local authorities are reporting fewer Reception pupils each year, which is likely to be due to a combination of changes to welfare benefits, rising rents and the possible effects of Brexit. Furthermore, projections indicate that demand for reception places is not expected to increase in the short term to the level of reception places available

Current Position - Demand for primary and secondary school places

3. **For the London Borough of Islington**, in 2019/20 there were 1952 Reception children for 2280 places available giving rise to a 328 surplus (14.4%). All six of Islington's planning areas have sufficient capacity for the foreseeable future based on current planned housing data and therefore further permanent increases to capacity are not required. Notably in Planning Area 6 where COLPAI is located, this planning area has a number of sites contributing significantly to housing projections in the EC1 postcode which include; 250 City Road of 930 homes (between 2020-2022), former Mount Pleasant Post Office of 336 homes on the Islington side (2022), 50 units delivered in Central Street, five scheme with planning permission for approximately 270 units, 25 units at Finsbury Tower on Bunhill Row (2021) and 66 units on the COLPAI development site (2023). In addition, the intended redevelopment of the Finsbury Leisure Centre is expected to deliver 120 units by 2023, half of which will be social housing.
4. In terms of Secondary sufficiency, Secondary school rolls have risen slightly, although not by as much as previously anticipated. There are sufficient places available for the future following agreed rises in admission numbers in some

schools and adjustments to admission numbers in others with PAN reductions having been agreed for Beacon High, and Arts and Media School Islington from 2020, to bring the number of surplus places below the desired 10%. **Tables 1 - 4 of Appendix 1** shows projections for demand for school places in LB Islington.

5. **For the London Borough of Southwark**, in 2019/20 there were 3,299 Reception children for 3,760 places available giving rise to a 461 surplus (12%). This figure was a surplus of 740 places in the previous year, and a programme of PAN reductions across 13 primary schools was proposed and agreed by LB Southwark Cabinet in October 2018 to address this. However, in the Planning Area 2 (PA2 – Bermondsey & Rotherhithe), where Galleywall and Redriff Primary academies are situated, some growth in reception numbers is anticipated for the future, driven by developments at Canada Water and the Old Kent Road, and that local demand will likely exceed capacity by September 2025. Births in the Surrey Docks ward (where Redriff is situated) and South Bermondsey ward (where Galleywall is situated) are both projected to increase from 2020 onwards. Southwark are currently working on revised projections. **Tables 5 & 6 of Appendix 1** shows projections for demand for school places in LB Southwark.
6. For secondary school demand, across Southwark there is sufficient supply of places as shown in **Table 7 in appendix 1**.
7. **For the London Borough of Hackney**, in 2019/20 there were 2560 Reception children for 3035 places available giving rise to a 475 surplus (15.7%). Hackney has therefore taken the decision to reduce the number Reception places by 105 across a number of schools in some schools in 2019/20 and 2020/21.
8. In terms of secondary school rolls, current projections indicate that there is no immediate demand for a new secondary school in Hackney, as earlier projections had indicated, resulting in the previous successful Free School application to the Department for Education for the City of London Academy Downs Park being subsequently withdrawn. **Tables 8 & 7 of Appendix 1** shows projections for demand for school places in LB Hackney.
9. **For the London Borough of Newham**, post-16 school places demand is more complex given applications is more governed by demand for particular institution than geographical area, and potential students can make multiple applications to a number of institutions rather than an order of preference but. For NCS the number of applications for the 300 paces available increased from 2,100 in 2017, to 3,000 applications for 300 places for September 2020. **Table 10 of Appendix 1** shows application to Newham Collegiate Sixth Form Centre against places available

Demand for places at City of London sponsored academies.

10. In addition to levels of demand for primary and secondary school places in areas relevant to City sponsored academies, parental preference will dictate if all places are filled in these schools. Attached to this report as **Appendix 2** shows all City sponsored academies, where the data has been made available, will fill all available places within 1st and 2nd preferences and for some schools from 1st choice preferences alone.

Legal Implications

11. None.

Conclusion

12. Demand for school places in London which reached record levels over the past decade are now showing a lower rate of increase than estimated in previous years and in some areas a significant decline. At primary school level in the London local authorities where there are City sponsored primary academies, these authorities have made adjustments to the PAN of some schools to address the higher than desired surplus number of places available. At secondary school level, the previous significant increase in demand at primary schools will in turn feed through to school schools for the next half decade and then projected to decline. Local authorities will continue to monitor this as part of their statutory duty to ensure sufficient school places.

13. The popularity and success of City sponsored academies means a high number of parents are choosing these schools as their first or second preference and for some schools from 1st choice preferences alone.

Appendices

- *Appendix 1: Projected demand for state-funded school places*
- *Appendix 2: Preference data for City of London sponsored academies*

Background Papers

- *School places demand projections, CoLAT Board, 18 July 2018*

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Demand for school places - London Borough of Islington

Table 1, LB Islington Reception Projections

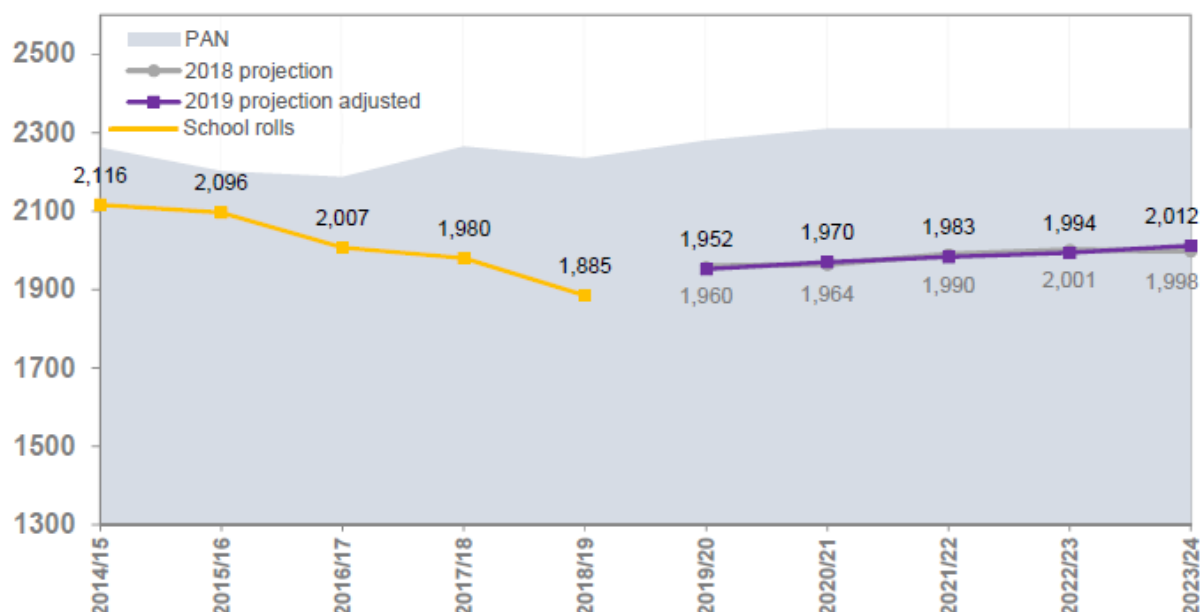


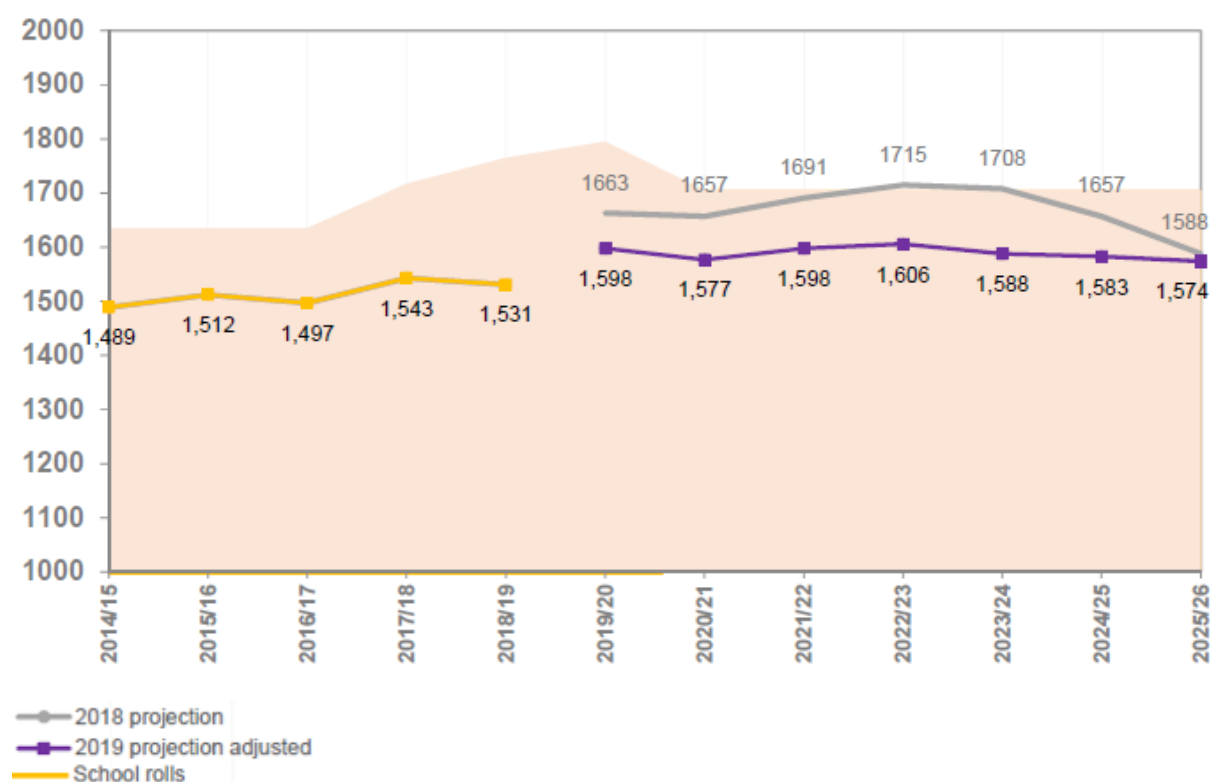
Table 1 above shows the difference between the GLA 2018 projections and the adjusted GLA 2019 projections as well as a drop in actual school roll numbers for 4 year olds. The capacity or published admission numbers ('PANs') is represented by the blue area and includes the permanent expansions of Tufnell Park (+45 PAN, PA1) from September 2019 and increase at Moreland from September 2017 (+15 PAN, PA6). City of London Primary Academy Islington (COLPAI), the new 60 PAN free school that opened in September 2017, is also included in PA6 with a temporary 30 PAN in 2018 to 2019 only.

Table 2, LB Islington Planning areas projections against PAN

Planning Area	2015 - 2016				2016 - 2017				2017 - 2018				2018 - 2019			
	Roll (R)	PAN (P)	(P) less		Roll (R)	PAN (P)	(P) less		Roll (R)	PAN (P)	(P) less		Roll (R)	PAN (P)	(P) less	
1 Holloway	418	417	-1		403	417	14		369	420	51		385	420	35	
2 Hornsey	467	495	28		444	495	51		428	495	67		380	495	115	
3 Highbury	360	375	15		357	375	18		360	375	15		318	375	57	
4 Barnsbury	267	320	53		252	290	38		224	290	66		207	290	83	
5 Canonbury	348	355	7		317	355	38		329	355	26		334	355	21	
6 Finsbury	236	240	4		234	255	21		270	330	60		261	300	39	
LBI Total	2096	2202	106		2007	2187	180		1980	2265	285		1885	2235	350	
% of places unfilled :			4.8				8.2				12.6				15.7	

Table 2 above shows although overall LB Islington has approximately 15% surplus of Primary school places across the borough, for Planning Area 6 where COLPAI is situated the surplus is at a desirable level. Also this planning area has a number of sites contributing significantly to housing projections which include; 250 City Road of 930 homes (2020-2022), Mount Pleasant of 336 homes on the Islington side (2022), five scheme with planning permission for approximately 270 units, and 66 units on the COLPAI development site (2023). In addition, the intended redevelopment of the Finsbury Leisure Centre is expected to deliver 120 units by 2023, half of which will be social housing.

Table 3, LB Islington Year 7 Projections

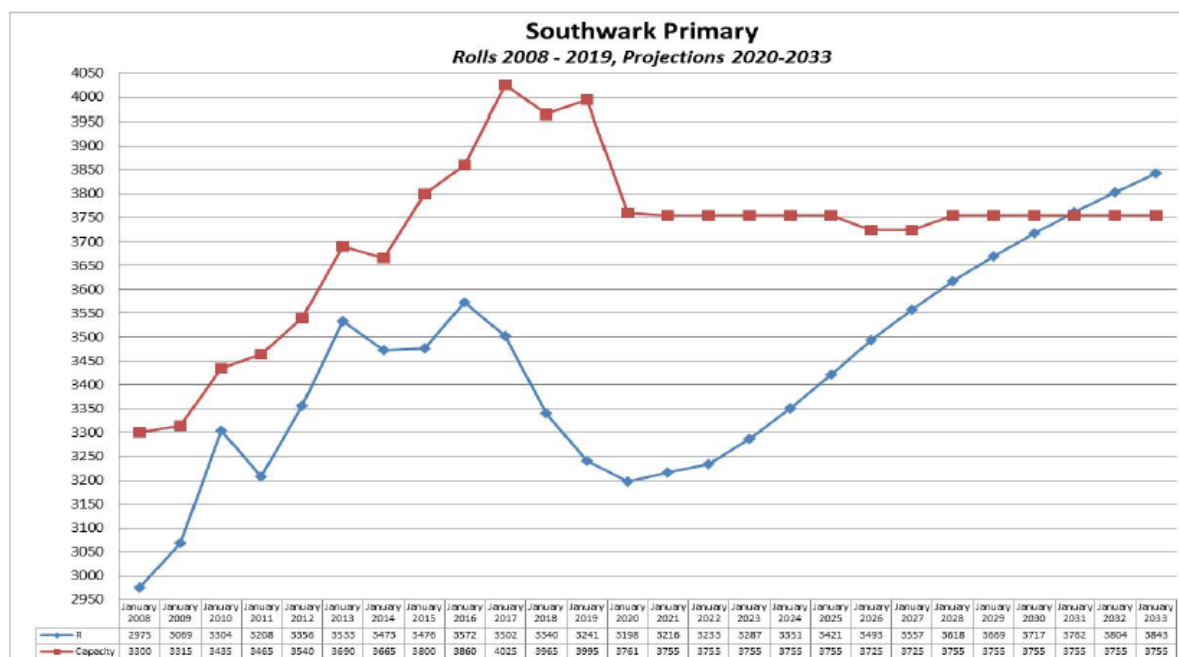


Secondary school rolls have stabilised at a lower projection for future years and LB Islington are now expected to have sufficient places for the foreseeable future.

LBI Mainstream Secondary Year 7					
	Academic Year	Roll Data & Projections	Capacity	Surplus Capacity	Surplus (%)
Actual roll	2015/16	1512	1635	123	8%
	2016/17	1497	1635	138	8%
	2017/18	1543	1717	174	10%
	2018/19	1531	1765	234	13%
Roll Projections	2019/20	1598	1795	197	11%
	2020/21	1577	1705	128	8%
	2021/22	1598	1705	107	6%
	2022/23	1606	1705	99	6%
	2023/24	1588	1705	117	7%
	2024/25	1583	1705	122	7%
	2025/26	1574	1705	131	8%

Demand for school places - London Borough of Southwark

Table 5 – LB Southwark Reception Projections



Southwark has seen a reduction since September 2015 in reception rolls. Reception rolls have fallen by over 13 forms of entry (13FE) and by 8% overall in 5 years since September 2015. However, in the Planning Area 2 (PA2 – Bermondsey & Rotherhithe), where Galleywall and Redriff Primary academies are situated, some growth in reception numbers is anticipated for the future, driven by developments at Canada Water and the Old Kent Road, and that local demand will likely exceed capacity by September 2025. Births in the Surrey Docks ward (where Redriff is situated) and South Bermondsey ward (where Galleywall is situated) are both projected to increase from 2020 onwards

Table 6 – LB Southwark Planning area 2 Reception Projections

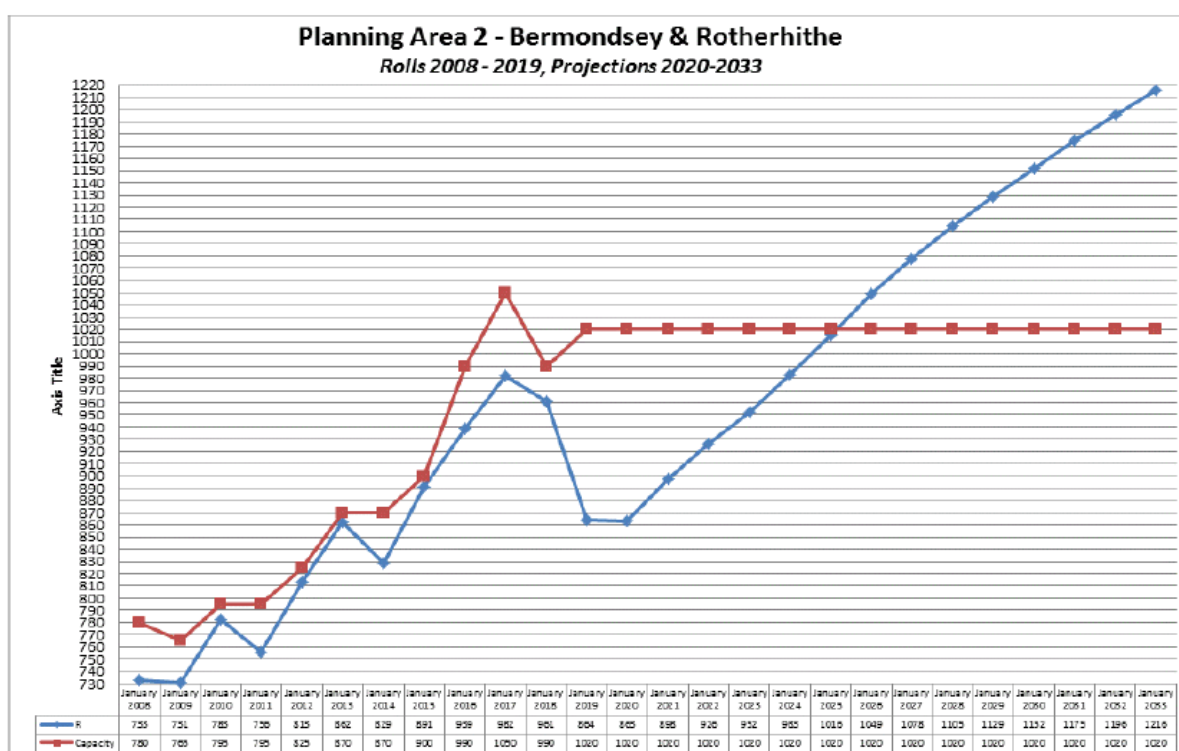
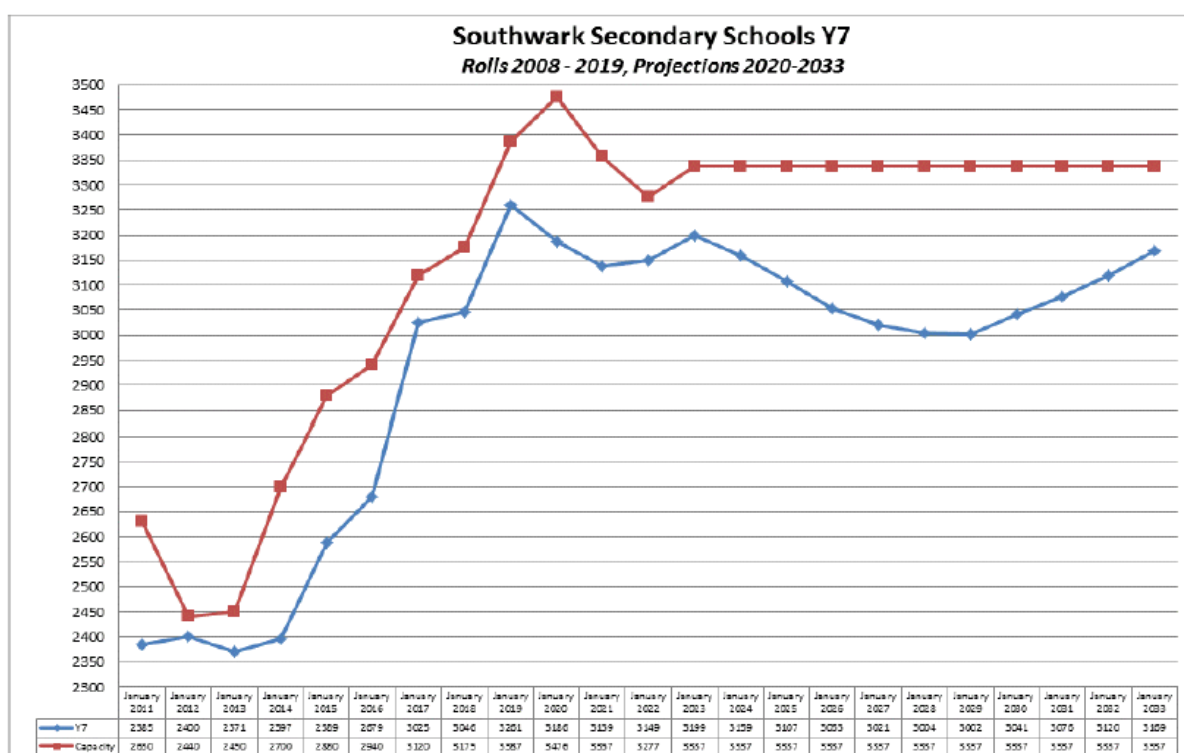


Table 7 - LB Southwark Year 7 Projections



Whilst secondary school applications in Southwark have plateaued overall over the last 2 years (an increase of 1.2% over this time), secondary applications from Southwark residents have increased over 5 years by 17% - London wide it is 14%. The percentage of non-Southwark residents making applications has decreased from 10% in 2015 to 6% in 2019

Table 8. LB Hackney Reception projections

Academic Year	Reception projections based on January 2019 census	Number of places available based on published PANS	Projected surplus places	% surplus based on PANS	Number of places available based on temporary reductions	Projected surplus reception places	% surplus places based on temporary reductions
2019/20	2560	3035	475	15.7%	2930	370	12.6%
2020/21	2567	3035	468	15.4%	2930	363	12.4%
2021/22	2522	3035	513	16.9%	3035	513	16.9%
2022/23	2572	3035	463	15.3%	3035	463	15.3%
2023/24	2613	3035	422	13.9%	3035	422	13.9%
2024/25	2636	3035	399	13.1%	3035	399	13.1%
2025/26	2659	3035	376	12.4%	3035	376	12.4%
2026/27	2697	3035	338	11.1%	3035	338	11.1%
2027/28	2726	3035	309	10.2%	3035	309	10.2%
2028/29	2745	3035	290	9.6%	3035	290	9.6%

The table above shows the projected number of children based on the January 2019 census compared to the available number of places (both permanent and temporary). The projections indicate that there will be a general increase in projected pupil numbers over the next few years; an increase of 7 pupils in 2020, 45 fewer pupils in 2021, before increasing by 50 pupils in 2022. The last three columns show the projected number of reception places given the temporary and permanent reductions in some schools from 2019 and 2020.

Table 9 - LB Hackney Year 7 Projections

Year Group	No. of pupils on roll October 2019 census	Year transferring to secondary school	No. of pupils projected to require Year 7 places (86% of Hackney residents + approx. 324 out borough pupils)	Number of Year 7 places available	Year 7 place shortfall (shown in red) or surplus (shown in black). (Based on the number of places available)	Year 7 shortfall by forms of entry (30 pupils per class)	Surplus places following Year 7 over allocations/ bulge classes (approx. +70 places each year)
Year 6	2534	Sep-20	2457	2459	2	0	72
Year 5	2635	Sep-21	2548	2509	-39	-1	31
Year 4	2663	Sep-22	2543	2509	-34	-1	36
Year 3	2625	Sep-23	2514	2509	-5	0	65
Year 2	2589	Sep-24	2457	2509	52	0	122
Year 1	2530	Sep-25	2442	2509	67	0	137
Reception	2593	Sep-26	2476	2509	33	0	103
1 year before reception	2726	Sep-27	2518	2509	-9	0	61
2 years before reception	2745	Sep-28	2533	2509	-24	-1	46
3 years before reception	2750	Sep-29	2537	2509	-28	-1	42
4 years before reception	2748	Sep-30	2536	2509	-27	-1	43
5 years before reception	2740	Sep-31	2529	2509	-20	-1	50

The table above shows secondary projections based on October 2019 primary census data. Although a shortfall of places (-39 and -34) is projected in 2021 and 2022 respectively, the final column shows that with a planned bulge class and over allocations (the natural movement of pupils before they start school in September), there will be a sufficient number of Year 7 secondary places.

Over allocation (an informal arrangement which provides a safeguard for schools ensuring that as pupils leave, or do not start, the final number on October census day or shortly afterwards is in line with the Published Admission Number (PAN)), creates approximately 70 additional secondary places each year.

Table 10 - Application to Newham Collegiate Sixth Form Centre

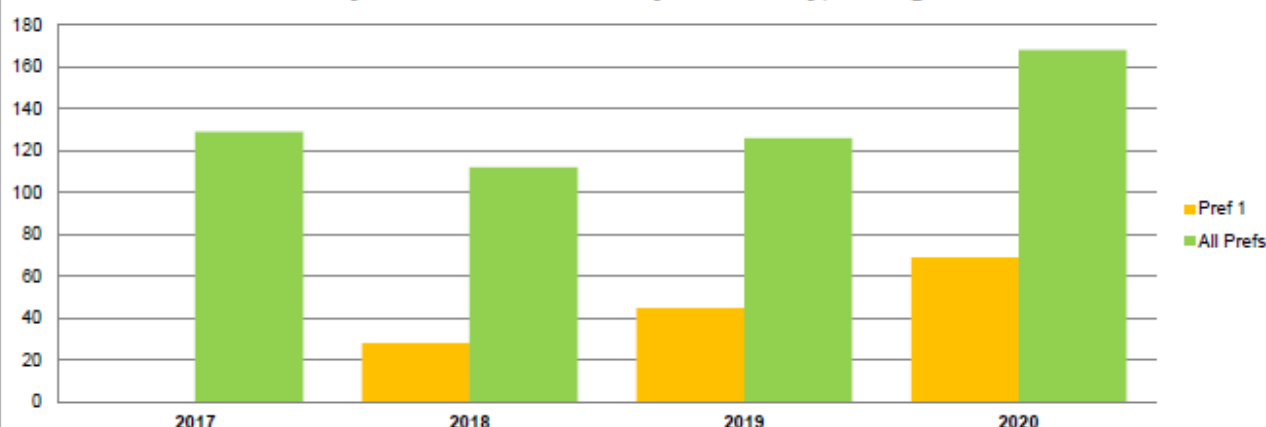
Year	Available places	No. of Applications	No. of offers made	No. Enrolled
2020	300	3,000	720	TBD
2019	300	2,800	700	324
2018	300	2,700	760	320
2017	300	2,100	500	300

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Preference data for City of London sponsored academies

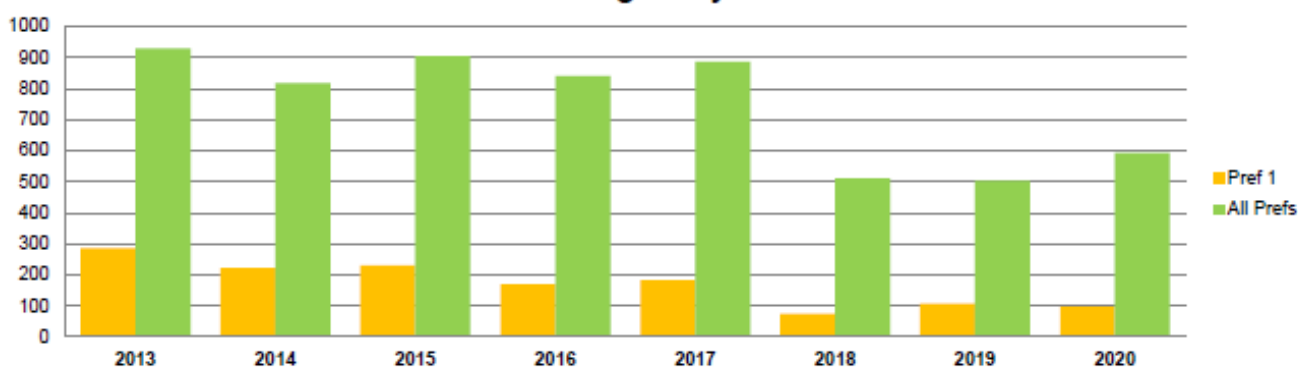
Primary Transfer 2020 (Provisional data as at 11/02/20) - All preferences for Islington Schools (does not include SEN pupils)											
COLPA-I	PAN	Pref 1	1st prefs as a % of PAN	% change 1st prefs	Pref 2	Pref 3	Pref 4	Pref 5	Pref 6	Total	Change in Total Prefs
2020	60	69	115%	-35%	41	23	10	14	11	168	42
*2019	30	45	150%	103%	33	21	16	5	6	126	14
2018	60	28	47%	n/a	20	28	17	13	6	112	-17
2017	60	Due to applications being made outside the Pan-London coordinated process, it is not possible to specify the preference ranking								129	n/a
KEY											
Increase >5% - UP											
Increase/decrease within 5% -SAME											
Decrease > 5% - DOWN											
*2019 - In-year variation to the PAN agreed by the ESFA											

City of London Primary Academy, Islington

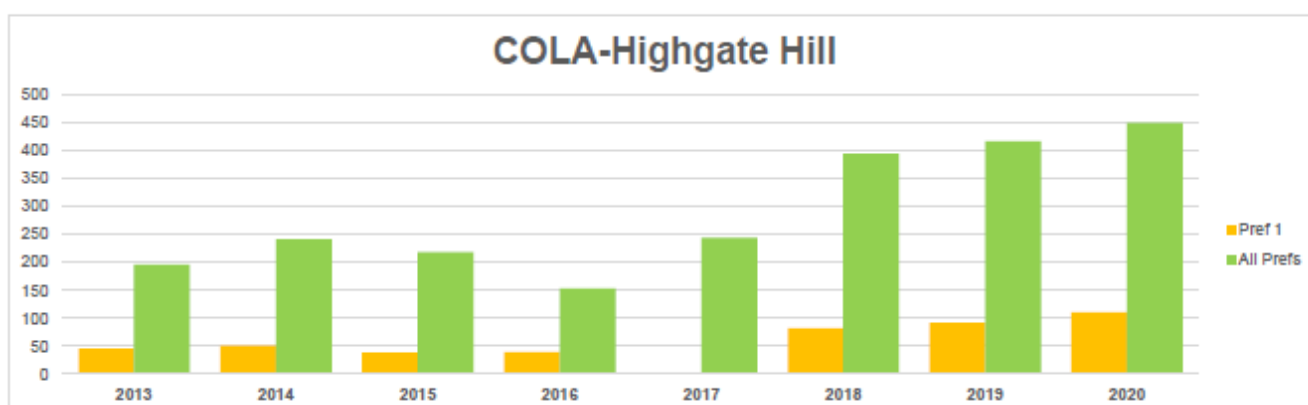


Secondary Transfer 2020 (Provisional data as at 14/11/19) - All preferences for Islington Schools (does not include SEN pupils)											
Highbury Grove / COLA Highbury Grove	PAN	Pref 1	1st prefs as a % of PAN	% change 1st prefs	Pref 2	Pref 3	Pref 4	Pref 5	Pref 6	Total	Change in Total Prefs
2020	240	97	40%	-5%	168	135	86	63	44	593	90
2019	240	108	45%	14%	114	113	80	51	37	503	-7
2018	240	75	31%	-56%	113	133	77	66	46	510	*N/A
2017	210	183	87%	6%	216	200	139	92	56	886	45
2016	210	170	81%	-29%	230	204	112	65	60	841	-64
2015	210	230	110%	4%	242	197	106	81	49	905	87
2014	210	222	106%	-30%	215	163	121	54	43	818	-111
2013	210	286	136%		252	187	117	61	26	929	
KEY											
Increase >5% - UP											
Increase/decrease within 5% -SAME											
Decrease > 5% - DOWN											
*Due to a change in PAN it is not possible to compare the number of all preferences											

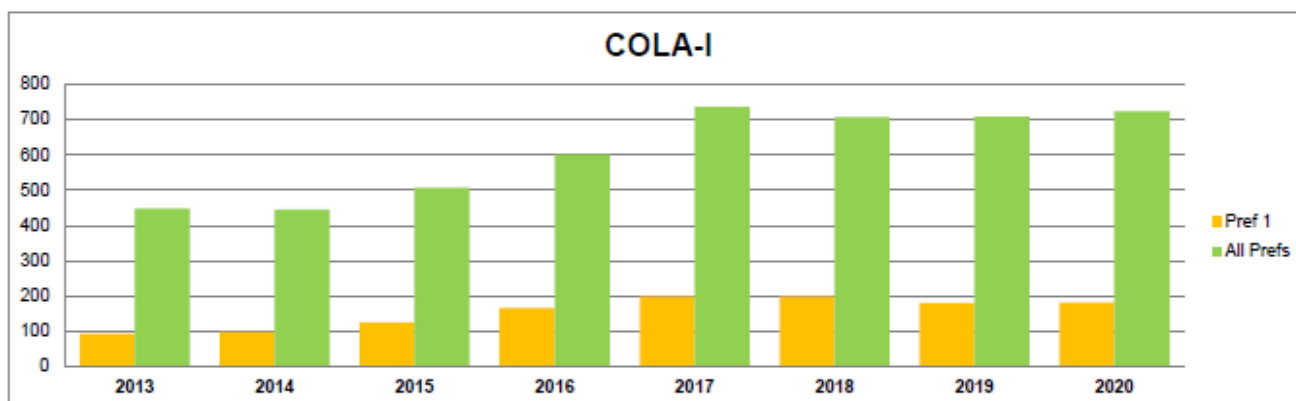
COLA-Highbury Grove



Secondary Transfer 2020 (Provisional data as at 14/11/19) - All preferences for Islington Schools (does not include SEN pupils)											
COLA-Highgate Hill	PAN	Pref 1	1st prefs as a % of PAN	% change 1st prefs	Pref 2	Pref 3	Pref 4	Pref 5	Pref 6	Total	Change in Total Prefs
2020	140	111	79%	14%	91	80	71	58	39	450	33
2019	140	92	66%	7%	83	90	63	51	38	417	22
2018	140	82	59%	N/A	84	65	77	44	43	395	151
*2017	140	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	244	N/A
MOUNT CARMEL SCHOOL CLOSED ON 31 AUGUST 2017											
2016	140	39	28%	1%	31	36	15	15	17	153	-66
2015	140	38	27%	-9%	51	38	34	34	24	219	-23
2014	140	51	36%	4%	48	63	34	27	19	242	46
2013	140	45	32%		43	42	27	20	19	196	
KEY											
Increase >5% - UP											
Increase/decrease within 5% - SAME											
Decrease > 5% - DOWN											
*2017 - Due to applications being made outside the Pan-London coordinated process, it is not possible to specify the preference ranking											

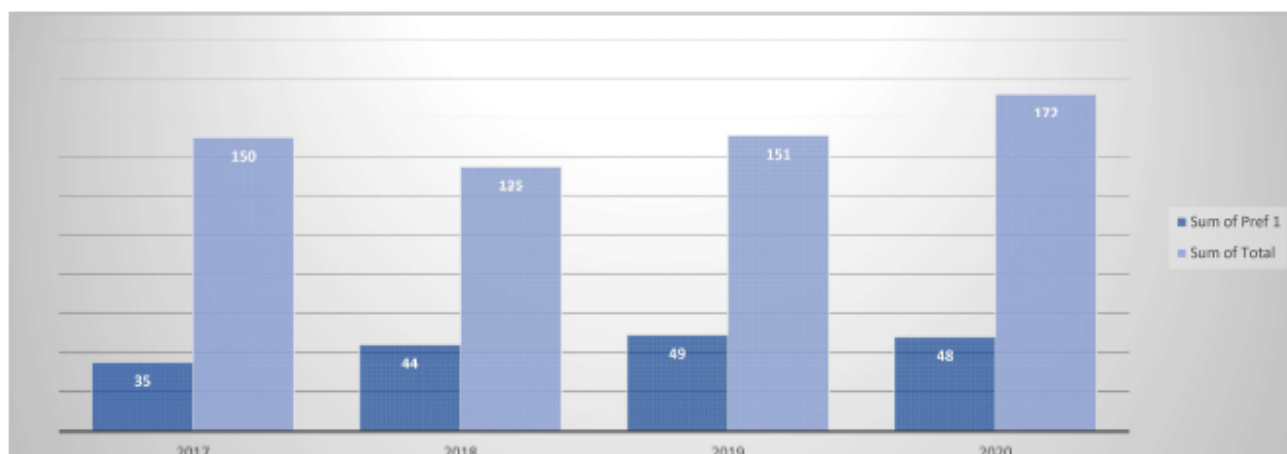


City of London Academy, Islington	PAN	Pref 1	1st prefs as a % of PAN	% change 1st prefs	Pref 2	Pref 3	Pref 4	Pref 5	Pref 6	Total	Change in Total Prefs
2020	165	182	110%	1%	191	153	93	58	46	723	15
2019	165	180	109%	-11%	197	158	79	61	33	708	1
2018	165	198	120%	-38%	182	144	78	68	37	707	*N/A
2017	125	198	158%	26%	146	151	110	77	53	735	135
2016	125	168	133%	33%	118	125	84	59	48	600	93
2015	125	125	100%	22%	115	108	71	47	41	507	62
2014	125	98	78%	3%	108	101	67	38	35	445	-3
2013	125	94	75%		101	105	58	53	37	448	
KEY											
Increase >5% - UP											
Increase/decrease within 5% - SAME											
Decrease > 5% - DOWN											
*Due to a change in PAN it is not possible to compare the number of all preferences											

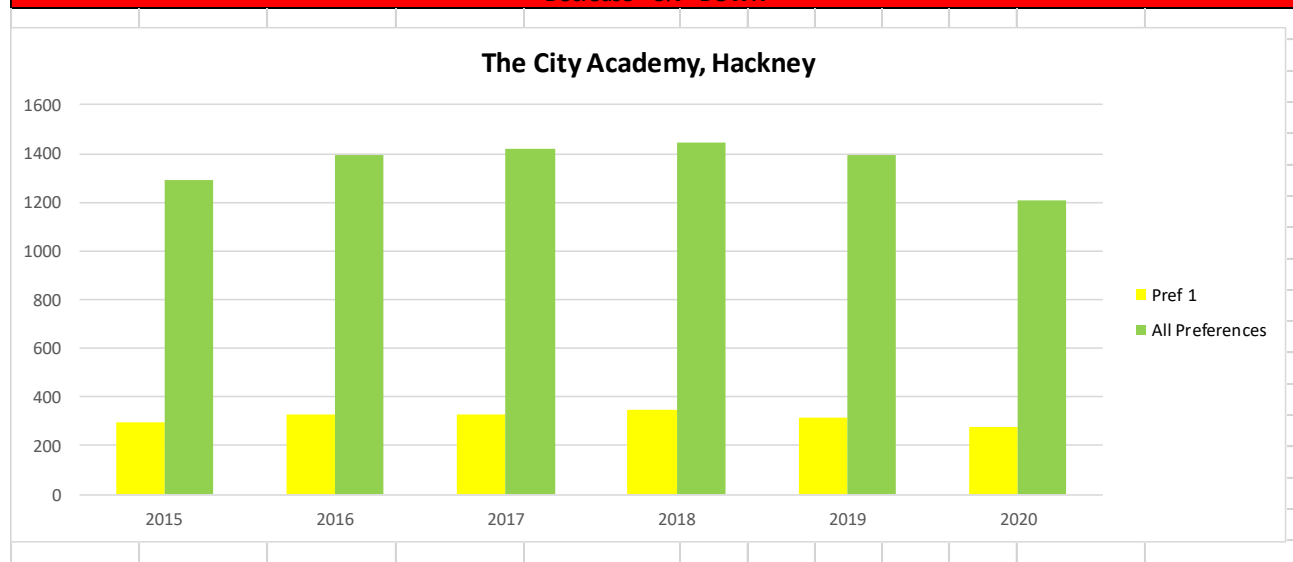


Primary Transfer 2020 (Provisional data as at 11/02/20) - All preferences for Galleywall Primary School											
Galleywall	PAN	Pref 1	1st prefs as a % of PAN	% change 1st prefs	Pref 2	Pref 3	Pref 4	Pref 5	Pref 6	Total	Change in Total Prefs
2020	60	48	80%	-2%	51	37	19	11	6	172	21
2019	60	49	82%	8%	38	23	20	14	7	151	16
2018	60	44	73%	15%	36	23	14	14	4	135	-15
2017	60	35	58%	N/A	44	35	15	12	9	150	N/A
KEY											
Increase >5% - UP											
Increase/decrease within 5% - SAME											
Decrease >5% - DOWN											

Galleywall Primary School City of London Academy



Year of Entry	PAN	Pref 1	1st prefs as a % of PAN	Direction from previous year	Pref 2	Pref 3	Pref 4	Pref 5	Pref 6	All Preferences	Direction of all preferences from previous year
2015	180	297	165%		339	310	187	102	54	1289	
2016	180	330	183%	Up	421	287	196	98	62	1394	Up
2017	180	331	184%	Up	385	365	179	108	50	1418	Up
2018	180	349	194%	Up	429	345	185	81	57	1446	Up
2019	180	317	176%	Down	420	314	168	116	60	1395	Down
2020	180	279	155%	Down	327	290	155	107	48	1206	Down
Key											
Increase >5% - UP											
Increase/Decrease within 5% - Same											
Decrease > 5% - DOWN											



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