

Committee	Date
City of London Academies Trust Board	11 July 2019
Subject: Policies for the Trust	Public
Report of: Claire Hersey, CFO	For approval
FOR PUBLICATION	
<p>Summary</p> <p>In 2018 the Board of Trustees approved a suite of key finance policies and Trust Whistleblowing, Freedom of Information (FOI) and Data Protection policies ensuring they were appropriate for the Trust's operations and to provide consistency across the Trust. These policies should be reviewed regularly to ensure they remain appropriate for the Trust's current operations.</p>	

Recommendations

The Trustees are asked to approve the following updated policies:

- Finance Policy
- Procurement and Tendering Policy
- Gifts and Hospitality policy
- Charging and Remissions policy
- Reserves policy
- Investment policy
- Whistleblowing Policy
- Freedom of Information Policy
- Data Protection Policy
- Records Retention

Main Report

Overview

1. In July 2018 the Board of Trustees approved a suite of key finance policies and Trust Whistleblowing and Freedom of Information (FOI) policies ensuring they were appropriate for the Trust's operations and to provide consistency across the Trust. These policies should be reviewed regularly to ensure they remain appropriate for the Trust's current operations.
2. 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

3. 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 Academies Financial Handbook has not yet been updated for 2019 and the changes to the new Academies Accounts Direction do not have any significant impact on finance policies.
4. These six finance policies will be reviewed in detail by the Trust Finance Audit and Risk Committee at its meeting on 4 July. The changes are as follows:
 - Finance Policy
 - Inclusion of bench-marking report in financial review/scrutiny meetings each year
 - Cannot purchase alcohol from any school funds (previously just from restricted funds) following increased scrutiny of schools buying alcohol
 - Additional guidance around reporting related party transactions to ESFA using the on-line form and seeking ESFA approval when required.
 - Procurement Policy
 - Less prescriptive regarding the frameworks that can be used as more are now available, but must seek CFO approval for any new frameworks
 - Gifts and Hospitality Policy
 - Cannot purchase alcohol from any school funds (previously just restricted funds) following increased scrutiny of schools buying alcohol
 - Charging and Remission Policy
 - No change just additional reference to local charging and remission procedures in each school
 - Reserves policy
 - No change from that approved in December 2018
 - Investment policy
 - No change

Whistleblowing Policy and Freedom of Information Policies

5. These 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 and are highlighted in the documents.

Data Protection and Records Retention Policies

6. In April 2018 the Trustees approved a Data protection policy and Records Retention policy to be compliant with GDPR regulations and the new Data Protection Act 2018. These policies have now been reviewed and updated/refined in consultation with the Trust Data Protection Officer (DPO). The changes are highlighted in the draft policy documents attached as appendices to this paper. Key changes include:

- Clarification of the DPO's responsibilities
 - Additional Appendix for guidance on dealing with subject access requests
7. The central Trust team are continuing to work on harmonising related policies and procedures across all the academies to include:
- Trust-wide templates and guidance for Data Protection Impact Assessments and data sharing agreements
 - Policies for Information Security, Working at Home, CCTV and IT Acceptable Use.

Appendices

- 1 – Updated Finance Policy
- 2 – Updated Procurement and Tendering Policy
- 3 – Updated Gifts and Hospitality Policy
- 4 – Updated Charging and Remissions Policy
- 5 – Reserves Policy
- 6 – Updated Investment Policy
- 7 – Updated Whistleblowing Policy
- 8 - Updated Freedom of Information Policy
- 9 – Updated Data Protection Policy
- 10 – Updated Records Retention Policy