

Schools - Controls Test Programme 2021/22

Introduction

Sound financial management and controls are essential to schools because these provide an effective framework for financial planning and accountability and safeguard the use of public funds.

The Governance handbook, last published by the DfE on 8 October 2020, sets out the government's vision and priorities for effective governance and provides a first point of reference on all the legal duties on boards. It highlights that all boards have three core functions: Ensuring clarity of vision, ethos and strategic direction; Holding executive leaders to account for the educational performance of the organisation and its pupils, and the performance management of staff; and Overseeing the financial performance of the organisation and making sure its money is well spent.

The Governance handbook also provides a framework for auditors and inspectors when they evaluate these arrangements.

The Croydon Scheme for Financing Schools sets out the financial relationship between the LA and the maintained schools that it funds. It contains requirements relating to financial management and associated issues, binding on both the LA and schools.

The Schools Financial Value Standard (SFVS) standard is a mandatory requirement for Local Authority maintained schools

The objective of the controls testing is to provide an independent oversight of the school's financial affairs and provide the Governing Body with independent assurance that:

- The financial responsibilities of the Governing Body are being properly discharged;
- Resources are managed in an efficient, economical and effective manner;
- Systems of internal financial control are being maintained; and
- Financial considerations and risks are fully taken into account in reaching decisions.

The following is an outline of the programme of checks to confirm the operation of the main financial system and that the LA's requirements are followed. (Please note: This programme is only periodically updated about every three years to help provide consistency and able school audit results to be better compared across years.)



School:	Period	2021/22	Auditor:	Date
Type:	Schools		Reviewed by:	Date
Control Area:	Governance and Leadership [1]			

Ref Key	Control Process	Testing Procedure	Completed by	Date	Result
1.1	Full Governing Body meetings				
	<p>As per the SFVS there should be documentary evidence that the Governors are meeting at least on a termly basis to discuss school issues and there should be documentary evidence of the issues addressed and the outcomes.</p> <p>(Requirement of: <i>The School Governance (Roles, Procedures and Allowances) (England) Regulations 2013 paragraphs 13 (Convening meetings of the governing body), 14 (Proceedings of the governing body) and 15 (Minutes and Papers) apply and SFVS.</i>)</p>	<p>1) Obtain copies of the full governing body minutes for the last year and check that the minutes held:</p> <ul style="list-style-type: none"> a) support regular termly meetings, b) include supporting documents tabled at the meeting, c) that the minutes have been approved and signed off by the Chairperson at the subsequent meeting; <p>2) Confirm that the meetings were quorate.</p> <p>3) Confirm that any committees set up report regularly to the full governing body and that this is included in minutes.</p>			
1.2	Induction /training for new Governors (Q1 SFVS)				
	<p>The governors should have been made aware of their responsibilities and understanding of their own financial management roles, responsibilities and those of others.</p> <p>Support and guidance is available to all Governing Body members via the Local Authority's Governor Services team.</p>	<p>1) Obtain evidence that new governors have been given adequate guidance and that their roles and responsibilities have been explained. Obtain/examine a copy of the school's induction pack or equivalent</p> <p>2) Assess the financial aspects of the induction information available</p> <p>This should include:</p> <ul style="list-style-type: none"> i. The Croydon Scheme For Financing Schools. 			

Ref Key	Control Process	Testing Procedure	Completed by Date Result
		<ul style="list-style-type: none"> ii. School's delegation of authorisation levels. iii. Current year's approved budget. iv. the Governance Handbook. v. - A list of training available for Governors. 	
1.3	Responsibilities of Finance Committee/s defined (Q2 and Q3 SFVS)		
Key	<p>Governing Bodies have the power to set up committees. Each of the committees set up will have specific designated powers within the scope of their documented and agreed terms of reference.</p> <p>(Requirement of: <i>The School Governance (Roles, Procedures and Allowances) (England) Regulations 2013 PART 5 Committees of Governing Bodies</i>)</p> <p>Q2 SFVS asks 'Does the governing body have a finance committee (or equivalent) with clear terms of reference and a knowledgeable and experienced chair?'</p> <p>Q3 SFVS asks 'Does the governing body board receive clear and concise monitoring reports of the school's budget position at least six times a year?'</p>	<p>1) Check whether the Governing Body have set up committees and obtain details of the Finance (or equivalent) Committee composition and Terms of Reference to establish whether these clearly define the responsibilities designated to the committee:</p> <ul style="list-style-type: none"> a) Frequency of meetings b) Expenditure authorities delegated to Head Teacher c) Reference to budget setting and reporting requirements d) Budget virements e) Disposal of assets f) Tendering / quotations needed g) Contract approval <p>Obtain a copy of the latest version and check that the ToR has been subject to annual review by the full Governing Body. Obtain meeting minutes as evidence.</p> <p>2) Obtain copies of minutes of the Finance Committees (or Governing Body if not delegated) for a 12 month calendar period and confirm that these:</p> <ul style="list-style-type: none"> a) Make adequate reference to budget monitoring, budget setting, authorisation of higher value purchases or projects, cheque signatories, 	

Ref Key	Control Process	Testing Procedure	Completed by Date Result
		<p>recruitment & staff emoluments (Payroll & Personnel authorisations). There should be an appropriate record of documents presented to these meetings and copies of such documents should be held with the minutes, e.g. Budget monitoring reports. Note any unusual or significant items and ask for explanations as necessary.</p> <p>b) Evidence regular meetings as required by the ToR</p> <p>c) These are quorate and</p> <p>d) Minutes have been approved and signed off by the Chairperson at the subsequent meeting.</p>	
1.4	Approved scheme of delegation (Q5 SFVS)		
Key	<p>The roles and responsibilities of the governing body, any committees, the Head Teacher and other members of staff in relation to financial decision making and authorisation should be set out in writing within a Scheme of Delegation. (The scheme of delegation may also incorporate the terms of reference of the committees of the governing body.)</p> <p>The Scheme of Delegation should document those officers who have been delegated authority to authorise expenditure, virements, etc. If authority has been delegated to curriculum or departmental staff for the certification of ordering and payment, then a list the names and sample signatures of current budget holders should be included within the Scheme.</p> <p>(This is a requirement of: <i>The School Governance (Roles, Procedures and Allowances) (England) Regulations 2013 paragraph 18.—</i></p> <p>(1)...the governing body may delegate any of its functions to:</p> <p>(a) a committee;</p> <p>(b) any governor other than a governor who is the head teacher; or</p>	<p>Obtain a copy of the school's delegation of authorisation levels.</p> <p>(Note that this may be the terms of reference for the committees or contained within the finance policy/manual).</p> <p>Confirm that:</p> <p>1) The document has been approved by the full Governing Body and has been reviewed by the Governing Body <u>annually</u>. Obtain meeting minutes as evidence.</p> <p>2) The roles and responsibilities of the governors, committees, Head Teacher and other relevant members of staff have been clearly defined in relation to financial decision making and administration.</p> <p>3) Delegation of authorisation levels are specified and also the different levels at which quotations or tenders are to be obtained. Assess whether these levels are appropriate.</p> <p>4) Ask the School whether there is access to adequate level financial expertise, including when</p>	

Ref Key	Control Process	Testing Procedure	Completed by Date Result
	<p>(c) where the function being delegated does not directly concern the head teacher, the head teacher (whether or not that person is a governor).</p> <p>(2) The governing body must review the exercise of functions they have delegated, annually</p> <p>Q5 of the SFVS requires Schools to have access to adequate level of financial expertise in the absence of specialist finance staff.</p>	<p>specialist finance staff are absent, e.g. on sick leave? Verbal confirmation sufficient.</p>	
1.5	Documented Financial Procedures available (Q18 & Q25 SFVS)		
Key	<p>Schools have many systems for processing and recording financial transactions, including governance, purchasing, payroll, contracting services, payroll and income collection. Control over these systems is fundamental in protecting the school from financial loss and fraudulent activity. The outputs of the various systems provide governors with invaluable information regarding the performance of the school.</p> <p>The Governing Body should therefore ensure that the school is working within documented and approved financial procedures in order to provide an effective framework within which the school's financial affairs are administered.</p> <p>As per Q18 of SFVS, does the school have procedures for purchasing goods and services that both meet legal requirements and secure value for money?</p> <p>As per SVS Q25, the School has adequate arrangements in place to guard against fraud and theft by staff, contractors and suppliers? (Please note any instance of fraud or theft detected in the last 12 months)</p>	<p>Obtain a copy of the school's financial procedures manual.</p> <p>Verify that:</p> <ol style="list-style-type: none"> 1) The School has detailed procedure notes covering all financial systems and procedures. 2) The school's financial procedures manual has been approved for adoption by the full Governing Body (in particular, where the procedures include the Scheme of Delegation). Obtain meeting minutes as evidence. 3) Check that the procedures have been subject to periodic review – this need not be done annually if there have been no changes and these do not include the Schools Scheme of Delegation. Obtain evidence of the last review and approval. 4) Check the arrangements in place to guard against fraud and theft. Note any instances of theft in the last 12 months. 	
1.6	Register of Pecuniary Interests and declarations of interests held (Q4 & Q24 SFVS)		
	<p>In compliance with the School Standards and Framework Act 1998, and Q4 of the SFVS declarations of pecuniary interests should be held for all members of the Governing Body. As a</p>	<p>Confirm that:</p>	

Ref Key	Control Process	Testing Procedure	Completed by Date Result
	<p>matter of best practice, it is also advisable to obtain declarations from the Head Teacher and other staff who are able to influence financial decisions. The Register forms an integral part of the school's system of financial control and as such should be held on site and made available for inspection by the Authority, Governors, Staff and parents.</p> <p>Q24 of the SFVS requires the School to have adequate arrangements in place to manage conflicts of interests and related party transactions.</p>	<ol style="list-style-type: none"> 1) The school holds a register of pecuniary interests for governors, which lists any business interests they or members of their immediate family have; 2) The Register includes the Head Teacher and any other staff who influence financial decisions; 3) The Register is open to examination by governors, staff, parents and the LA (if this is published on the website, this is sufficient); 4) Register of Business interest forms have been renewed and countersigned for all current Governors within the last 12 months; and. 5) The agendas of each Governing Body and each committee meetings include a standing item for declarations of interests to be raised and declared if appropriate. 6) Ask if the School has adequate arrangements in place to manage conflicts of interests and related party transactions. If any conflicts have arisen, request evidence of management and resolution. 	
1.7	Schools Financial Value Standard (SFVS) has been completed and action is taken to address weaknesses. (Q29 SFVS)		
	<p>The standard consists of 29 questions which governing bodies should formally discuss annually with the Head Teacher and senior staff.</p> <p>The questions which form the standard are in sections A to G. Each question requires an answer of Yes, In Part, or No.</p> <p>If the answer is Yes, the comments column can be used to indicate the main evidence on which the Governing Body based its answer.</p> <p>If the answer is No or In Part, the column should contain a very brief summary of the position and proposed remedial action.</p> <p>In the 'Introduction and outcomes' (and in line with Q29), governors should summarise remedial actions and the</p>	<ol style="list-style-type: none"> 1) Obtain evidence of the minutes from the Full Governing Body meeting at which the SFVS was discussed and agreed. 2) Review the SFVS and identify and answers which state: <ul style="list-style-type: none"> • YES: Identify whether there is evidence provided on which the governing body based its answer. • IN PART OR NO: identify whether there is a brief summary of the position and proposed remedial action. 	

Ref Key	Control Process	Testing Procedure	Completed by Date Result
	<p>timetable for reporting back. Governors should ensure that each action has a specified deadline and an agreed owner.</p> <p>The governing body may delegate the consideration of the questions to a finance or other relevant committee, but a detailed report should be provided to the full governing body and the chair of governors must sign the completed form.</p> <p>The school must send a copy of the signed standard to their local authority's finance department.</p> <p>There is no prescription of the level of evidence that the governing body should require. The important thing is that governors are confident about their responses.</p>	<p>3) Identify whether the School had completed and submitted the SFVS to their Local Authority by 31 March 2021 (and annually thereafter). Review evidence of submission.</p> <p>4) Confirm whether the current version of the SFVS form has been used and based on the results of the audit, determine if the school's SFVS is accurate.</p>	
1.8	Internal Audit recommendations reported to Governing Body (Q23 SFVS)		
	<p>The Schools Financial Value Standard (SFVS) Question #23 requires the Governing Body to ensure there are no outstanding matters from audit reports or from previous consideration of weaknesses.</p>	<p>Establish when the school's last Internal Audit was. Through enquiry and examination of relevant documentation, establish when the report had been presented to the Governing Body and whether the risks have been cleared. Obtain meeting minutes as evidence.</p>	
1.9	Whistleblowing procedures in place and communicated (Q26 SFVS)		
	<p>Schools and their parent LAs are covered by the Public Interest Disclosure Act 1998 which added legal backing to the Nolan proposals. To quote from the Act itself, it is., "<i>An Act to protect individuals who make certain disclosures in the public interest; to allow such individuals to bring action in respect of victimisation; and for connected purposes.</i>"</p> <p>Following on from the Act, each LA has developed its own Whistle Blowing policy to provide protection for individuals who disclose malpractice and wrongdoing. This policy will apply to the school and it would be appropriate for the governing body to consider the LAs policy and endorse procedures for school staff and ensure its staff are made aware of its existence. In particular, they should be made aware of:</p>	<p>1) Establish whether the school has details of the LA whistle blowing policy for schools.</p> <p>Where the School has formulated and adopted its own whistle blowing policy check that this covers the following:</p> <ul style="list-style-type: none"> a) the/method to raise concerns b) contains an Independent point of disclosure (i.e. someone not involved in the management of the School) c) gives a Guarantee of anonymity 	

Ref Key	Control Process	Testing Procedure	Completed by Date Result
	<ul style="list-style-type: none"> * The categories of staff to who the protection is available * The areas of malpractice and wrongdoing that are covered; * The routes available within the LA for raising issues. <p>(Note - the School may adopt its own whistle blowing procedures.)</p> <p>Q26 of the SFVS also states whether staff are aware of the of the whistleblowing arrangements and to whom they should report concerns.</p>	<p>2) Determine and assess the arrangements that are in place to make sure that staff are aware of it.</p> <p>3) Obtain evidence to verify that the Governing Body has approved the Whistle blowing Policy</p>	

School:	Period	2021/22	Auditor	Date
Type:	Schools		Reviewed by	Date
Control Area:	Budget Planning, Monitoring and Reporting [2]			

Ref Key	Control Process	Testing Procedure	Completed by	Date	Result
2.1	Appropriate Budget Setting Procedures (Q6, Q9, Q10, Q11and Q13 of SFVS)				
Key	<p>There should be an adequate framework that will ensure an appropriate budget is prepared and approved prior to commencement of the financial year. Effective budget setting should incorporate the following factors:</p> <ul style="list-style-type: none"> * all income sources & basis of funding from LEA * project expenditure and income as identified in SDP <p>The Croydon Scheme for Financing Schools details the process for a deficit license.</p> <p>The annual budget should be formally approved by the full Governing Body.</p> <p>The Schools Financial Value Standard (SFVS) Q9 requires the School to set a well-informed and balanced budget with an agreed and timed plan for eliminating any deficits for at least three years, using the best available information.</p> <p>As per Q10 of the SFVS the School should ensure the budget setting process allows sufficient time for the Governing Body to scrutinise and challenge the information provided.</p> <p>Q11 of the SFVS requires the School to be realistic in their pupil number projections and make sure they can quickly recast the budget if the projections and reality are different.</p>	<p>1) Through discussion with the Head Teacher and the examination of budget plans establish whether all factors were taken into account. For example, lettings income etc. This should be based on the best and most complete information available (e.g. actual and projected pupil numbers and notifications of funding levels).</p> <p>2) If an overall deficit budget has been set, check that this has been licensed / agreed by the Council and that a 3 year-plan is in place to eliminate it.</p> <p>Similarly, if the School are carrying a significant level of reserves (more than 8% of its budget), a plan agreed by the LA should be in place that defines how these reserves will be used.</p> <p>3) Check that budget plans were approved by the Full Governing Body - this should be documented within the minutes of the relevant meeting – and was submitted to the Council by 1 May 2021 *(and annually thereafter). Check if the timing was appropriate.</p> <p>4) Obtain a copy of the school’s Three-Year Budget Plan and confirm if there is a balanced budget based on suitable income and expenditure items. If this forecast a deficit, establish what actions the School is planning to remedy this and assess if these address the issue.</p>			

Ref Key	Control Process	Testing Procedure	Completed by Date Result
	<p>As per Q13 of the SFVS, the School should ensure the balances are at a reasonable level and the School has a plan for using money it plans to hold in balance at the end of each year.</p> <p>As per Q6 of the SFVS the School is required to have a realistic, sustainable, and flexible financial strategy in place for at least the next 3 to 5 years, based on realistic assumptions about future funding, pupil numbers and pressures. The strategy should be integrated with the School's strategy for raising standards and attainment.</p>	<p>5) Check if the School has undertaken a pupil number projection and determine, if required, that the school can quickly recast the budget if the projections and the reality are significantly different.</p> <p>6) Establish whether the School ensures the balances are at a reasonable level and if they have a plan for using the money they hold in balance at the end of each year. Obtain the plan.</p> <p>7) Confirm whether the School has in place a 3-year strategy and:</p> <p>a. Confirm if the strategy is realistic, sustainable and flexible</p> <p>b. Confirm if the strategy has been approved by Governors</p> <p>c. Is the policy based on future funding, pupil numbers and pressures?</p> <p>d. Is the policy integrated with the School's strategy to raise standards and attainment?</p>	
2.2	Budget correctly updated to SIMS/Schools Financial System (Q27 SFVS)		
	<p>The school's approved budget as agreed with the Council and the Governing Body should be correctly input to SIMS.</p> <p>Refer to SFVS Q27 '<i>does the School have an accounting system that is adequate and properly run and delivered accurate reports, including the annual Consistent Financial Reporting return.</i>'</p>	<p>Obtain a documented copy of the school's approved budget and to the budget set up on SIMS (using the <i>Chart of Accounts Review - Cost Centre Report</i>). Reconcile (i) the totals on both reports and 5 of the main budget headings and confirm</p> <p>a. Confirm the budget has been entered correctly and that no unauthorised virement(s) have occurred.</p> <p>b. If the budget has been 'fixed', check this as been authorised and documented (If it has been fixed it will be in the "Original Budget column).</p>	

Ref Key	Control Process	Testing Procedure	Completed by Date Result
		<p>c. School has an adequate and properly run accounting system.</p> <p>d. Establish whether it runs reports including the annual consistent financial reporting return.</p> <p>Note: Obtain the school's Annual Budget Listing - By Ledger Code report and a copy of the Chart of Accounts Listing Report.</p>	
2.3	Appropriate financial competencies of Governors and Staff (Q1 and Q2 SFVS)		
	<p>Schools Financial Value Standard (SFVS) Question #1 requires that the governing body and senior staff have adequate financial skills among its members to fulfil its role of challenge and support in the field of budget management and value for money.</p> <p>SFVS Question #2 requires that the finance committee chair is appropriately experienced in financial skills and management.</p> <p>The Governance handbook paragraph 43 (page 32) states that, '<i>The board's [Governing Body's] third core function is to oversee financial performance and make sure money is well spent. It should do this by ensuring it has at least one individual with specific, relevant skills and experience of financial matters. However, everyone on the board should have a basic understanding of the financial cycle and the legal requirements of the school on accountability and spend.</i>'</p>	<p>1) Through enquiry of staff and examination of any relevant documentation held, confirm if there are sufficient financial competencies (i.e skills matrix/SFVS appendix) for:</p> <p>(i) Staff with financial responsibilities, and</p> <p>(ii) All members of the Governing Body.</p> <p>(Refer to the DfE website for a financial management skills matrix for governors under the 'Additional Resources' in the 'Support Notes' section of the DfE SFVS webpages. Make sure the current version is being used.)</p>	
2.4	Budget Monitoring Procedures (Q4 and Q12 SFVS)		
Key	<p>Monitoring procedures should be appropriate for the value of the resources being managed and there should be overall control over expenditure. This may be achieved by the following:</p>	<p>1) Obtain copies of the budget monitoring reports used by the Head Teacher and the Governors and comment on whether it documents oversight of opening balance, income, expenditure, unreconciled purchases and a closing balance in any given month.</p>	

Ref Key	Control Process	Testing Procedure	Completed by Date Result
	<ul style="list-style-type: none"> * Preparation of monthly budget monitoring reports from the school's financial accounting system * Established reporting lines (i.e. Finance Committee, Governing Body, etc.) * Established cycle of reporting (e.g. monthly, six-weekly) * Clear roles/responsibilities regarding the monitoring of income and expenditure * Records of corrective action taken <p>The Schools Financial Value Standard (SFVS) Question #4 requires the Governing Body receives clear and concise monitoring reports of the school's budget position at least six times a year.</p> <p>SFVS Question #12 requires that variances in the end year outturn and year end outturn are reported to the Governing Body in a timely manner.</p>	<p>2) Confirm and obtain evidence that:</p> <ul style="list-style-type: none"> a. the budget is regularly monitored by the Head Teacher on a monthly basis and b. quarterly by the Finance Committee or Governing Body. <p>3) Review the monitoring reports and obtain explanations for any significant variances (over or under spending). Establish whether appropriate remedial action is being taken in a timely manner (at least 6 months in advance of a forecasted deficit).</p> <p>4) Comment on whether school is demonstrating financial health or is experiencing financial difficulty.</p> <p>(Note if an overall deficit is forecast or appears likely, establish the adequacy of actions being taken to remedy this.)</p> <p>5) Identify from the Head Teacher the extent of formal delegation for managing the school's budget e.g. responsibility delegated to curriculum budget holders and confirm that any delegated budget holders receive regular and appropriate updates regarding their expenditure and remaining available funding.</p>	

School:	Period	2021/22	Auditor:	Date
Type:	Schools		Reviewed by	Date
Control Area:	Payroll [3]			

Ref Key	Control Process	Testing Procedure	Completed by Date Result
3.1.	Correct payments and staff structure (Q14 and Q16 SFVS)		
	<p>The Head Teacher should maintain a list of staff employed, which includes their up to date pay rates. Regular spot checks should be carried out by the Head Teacher to ensure that payments made are appropriate and accurate. Checks should ensure that only persons employed at the school are paid by the school and that the amounts paid are correct.</p> <p>Schools Financial Value Standard (SFVS) Q14 asks <i>'Does the school review and challenge its staffing structure regularly to ensure it is the best structure to meet the needs of the school whilst maintaining financial integrity?'</i></p> <p>As per Q16 of the SFVS, the School should benchmark the size of its senior leadership team annually against that of similar schools</p>	<ol style="list-style-type: none"> 1) Check the payroll listing against the SIMS list of current staff (Note source of evidence used for verification and ascertain explanations for any variances highlighted.) 2) Check whether the staff structure has been reviewed in the last 12 months and whether staff details and roles are visibly displayed (physically or electronically). 3) Through enquiry and examination of appropriate documentation confirm that the School's staffing structure was reviewed in the last 12 months by the Governing Body/Personnel Committee. 4) Check to confirm that the Head Teacher reviews and signs the monthly payroll reports to confirm accuracy and acceptance. 5) Examine the payroll, disbursement account records and school fund records for awards/ex gratia payments and check for validity and proper authorisation. 6) Establish whether the School benchmarks the size of its senior leadership team annually against that of similar schools. This should be shared with governors. Obtain a copy of the last such benchmark report. 	

Ref Key	Control Process	Testing Procedure	Completed by Date Result
3.2.	Starters are properly administered		
	<p>There should be an adequate framework that would ensure that all appointments/terminations are necessary and comply with the school's policy and statutory requirements.</p> <p>Refer to https://www.gov.uk/check-job-applicant-right-to-work - copies of documents seen must be signed and dated and annotated 'original seen'.</p> <p>Refer to 'Keeping Children Safe in Education' https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/954314/Keeping_children_safe_in_education_2020_Update_January_2021.pdf for information on shortlisting, interviewing and safeguarding checks.</p>	<p>Select a sample of 3 three starters in primary schools and five in secondary schools from the period under review. NB: Please ensure that at least one of the sample is a member of non-teaching staff and one a teacher if possible.</p> <p>Establish whether:</p> <p>a) The posts were advertised (or employees were recruited from a pool of candidates).</p> <p>b) The shortlisting and interview panels consisted of the same officers, one of whom was trained in safer recruitment.</p> <p>c) Evidence is available of the panels' notes.</p> <p>d) (i) Two references from a recent employer were taken, (ii) These are on file and (iii) Are sufficient to justify the appointment (i.e. no concerns were included). (iv) Obtained in advance of appointment being offered.</p> <p>e) Evidence of the right to work in the UK and proof of identification was obtained prior to any offer of employment. (Refer to UKBA guidance that requires signed copies to be maintained.)</p> <p>f) Are there any employees who did not have an Enhanced DBS before their start date? If so, is there a Barred list (formerly List 99) check carried out prior to employment? Is this evidenced?</p> <p>g) A DBS (formerly CRB) check has been carried out in a timely manner (i.e over 15 days). If DBS has not</p>	

Ref Key	Control Process	Testing Procedure	Completed by Date Result
		<p>been obtained a search form and risk assessment should have been completed.</p> <p>Note: There is no longer an employer's copy and the expectation is that the school has sight of the employees copy. In line with UK GDPR and the DPA 2018 a copy can only be kept for 6 months.</p> <p>Where an enhanced DBS disclosure indicates previous conviction/s the school should have completed and recorded a risk assessment.</p> <p>h) Compare starting salary to payroll records (PFIS) for accuracy.</p>	
3.3	Leavers are properly administered		
	<p>There should be an adequate framework that would ensure that all appointments/terminations are necessary and comply with the school's policy and statutory requirements.</p>	<p>Select a sample of 3 three leavers in primary schools and five in secondary schools from the period under review:</p> <p>a) Confirm that leaving date agrees with correspondence, i.e. resignation letter/termination notice and whether the Head Teacher acknowledged the resignation in writing.</p> <p>b) Confirm that the leavers sampled are no longer being paid.</p> <p>(Note the number of leavers should more or less equal the number of starters. If there is disparity, this should be queried).</p>	
3.4	Pay policy and procedures are appropriate		
	<p>The Governing Body should establish procedures for the administration of personnel activities including appointments, terminations and promotions.</p> <p>The School pay policy must be annually approved by the Governing Body.</p>	<p>Check with the Head Teacher whether there is a School Pay Policy and whether it has been annually approved by the Governing Body. Obtain a copy of the document and review the Governing Body minutes to identify and document the date of approval</p>	

Ref Key	Control Process	Testing Procedure	Completed by Date Result
3.5	Head Teachers Annual Appraisal and Pay (Q15 SFVS)		
	<p>The process for both teacher and Head Teacher appraisal needs to be documented in the school's appraisal policy.</p> <p>This is a requirement of: <i>The Education (School Teachers' Appraisal) (England) Regulations 2012</i> :</p> <p>4. <i>The governing body of a school must appoint an external adviser for the purposes of providing it with advice and support in relation to the appraisal of the Head Teacher. Q15 of the SFVS requires the School to use professional independent advice informed part of the pay decision process in relation to the Head Teacher and it is tightly correlated to educational outcomes and sound financial management.</i></p> <p>7. (2) <i>In appraising the performance of the Head Teacher, the governing body of a school must consult the external adviser appointed under regulation 4.</i></p> <p>The appraisal is usually carried out by an appraisal sub/group/panel of two or three governors with an external adviser being used for advice, support and to consult with regarding appropriate objectives. It makes a recommendation on pay progression, where relevant, which must be by 31 December.</p> <p>Q15 of SFVS asks whether, <i>'Has the use of professional independent advice informed part of the pay decision process in relation to the Head Teacher and is it tightly correlated to strong educational outcomes and sound financial management?'</i></p> <p>Each school has a leadership group salary scale, in line with the teachers' Pay and Conditions document, agreed with the Council.</p> <p>Pay ranges for Head Teachers should not normally exceed the maximum of the leadership group. However,</p>	<ol style="list-style-type: none"> 1) Obtain a copy of the Schools Pay Policy and / or Appraisal Policy. Confirm that this details the process for appraising the Head Teacher. 2) Confirm that a Head Teacher appraisal sub/group/panel of two or three governors with an external adviser has been established. 3) Confirm that the annual appraisal of the Head Teacher was completed by 31st December and that the results are in writing along with any pay increase. 4) Any increase in Head Teacher pay should be ratified by the full Governing Body. 5) Confirm that any increase in Head Teachers pay has been correctly applied (may be retrospective from September). There should only be an annual increase in pay. 	

Ref Key	Control Process	Testing Procedure	Completed by Date Result
	the pay range may exceed the maximum where the Governing Body determines that circumstances warrant. The maximum of the Head Teachers' pay range and any additional payments should not exceed the maximum of the Leadership group by more than 25% other than in exceptional circumstances; in such circumstances, the governing body must seek external independent advice before providing such agreement and support its decision with a business case.		
3.6	Personnel records are held securely		
	<p>The Head Teacher should ensure that only authorised staff have access to personnel files.</p> <p>This is a requirement of the Data Protection Act 2018 and the UK General Data Protection Regulations (UK GDPR)</p>	Ask the School whether personnel records are held securely and that only authorised officers have access to those files. Comment on whether officers are aware of the need for confidentiality. Verbal Confirmation Sufficient.	
3.7	A Single Central Record (central DBS register) is maintained		
	<p>A Single Central Record (centralised DBS register) for all staff employed at the School should be maintained. (Including agency/temporary staff.)</p> <p>This should detail:</p> <ul style="list-style-type: none"> - All staff employed - Governors - When DBS checks were undertaken - renewal dates - List 99 checks <p>NB: Under the School Governance (Constitution and Federations) (England) (Amendment) Regulations 2016. Where a governor has been elected or appointed before 1st April 2016 and does not hold an enhanced criminal</p>	<p>1) Establish whether the School maintains a Single Central Record.</p> <p>2) Examine the document and identify whether DBS checks are up to date (i.e., are reviewed every 3 years).</p> <p>3) For Governors check that the DBS has been applied for within 21 days of the appointment or election. If there are no new governors within the last 12 months, establish if the Check is less than three years old (please see Question 2).</p> <p>(Note:</p> <ol style="list-style-type: none"> 1) Obtain a copy of the DBS register without personal data. 2) Copies of the DBS checks should not be retained for more than 6 months – this is against the DPA 	

Ref Key	Control Process	Testing Procedure	Completed by Date Result
	<p>record certificate, the governing body must apply for such a certificate in respect of that governor by 1st September 2016. Where a governor is elected or appointed on or after 1st April 2016 and does not hold an enhanced criminal record certificate, the governing body must apply for such a certificate in respect of that governor within 21 days after his or her appointment or election</p> <p>Refer to 'Keeping Children Safe in Education' https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/954314/Keeping_children_safe_in_education_2020_-_Update_-_January_2021.pdf for information on the Single Central Record.</p>	<p>2018 and UK GDPR and why there is a single central record.</p> <p>3) Some staff may be subscribed to the automatic update / renewal service which negates the need to renew 3 year DBS checks.)</p>	

School:	Period	2021/22	Auditor:	Date
Type:	Schools		Reviewed by	Date
Control Area:	Safeguarding [4]			

Ref Key	Control Process	Testing Procedure	Completed by Date Result
4.1.	Compliance with Statutory Requirements		
	<p>To assess compliance with Keeping Children Safe in Education (DfE 2021) - statutory guidance which schools must have regard to when carrying out their duties to safeguard and promote the welfare of children. This means that they should comply with it unless exceptional circumstances arise.</p> <p>This document sets out the roles of schools and their staff, and makes a number of key requirements.</p>	<ol style="list-style-type: none"> 1) Schools are required to complete an annual safeguarding self-assessment and submit this to the Council in September each year. Obtain a copy and confirm that this was submitted by the deadline. 2) Identify whether the School has a Designated Safeguarding Lead (DSL), a nominated deputy and designated safeguarding Governor. <ol style="list-style-type: none"> a) Obtain the names and positions of these and check that this information is displayed on the School website. b) Obtain evidence that the DSL and deputy have attended Designated Safeguarding Lead Training (statutory) within the last 2 years. c) Ask the School how children are made aware of who the DSL lead person is –e.g.by displaying pictures of DSL/s. Verbal Confirmation Sufficient. 3) School safeguarding systems should be explained to staff as part of the staff induction process. Obtain a copy of the staff induction pack and confirm that it includes the following: - <ol style="list-style-type: none"> a) The Child Protection Policy – check that this is also published on the School’s website. b) The Staff Behaviour Policy (or code of conduct) c) The role of the designated DSL 4) Check that staff members receive appropriate training, which is regularly updated, and which has 	

Ref Key	Control Process	Testing Procedure	Completed by Date Result
		<p>been approved by Governors. This should be signed for training and should include:</p> <ul style="list-style-type: none"> a) Awareness training for whole staff (statutory) b) Training about preventing terrorism (statutory) c) Training on specific issues <ul style="list-style-type: none"> i. Female Genital Mutilation ii. Child Sexual Exploitation <p>5) In addition, check whether staff members receive safeguarding and child protection updates (this would typically be carried out on an inset day), at least annually. Obtain evidence of this.</p> <p>6) All staff should be aware of the process for making referrals:</p> <ul style="list-style-type: none"> a) regarding children, or b) regarding adults <p>along with the role they might be expected to play in such assessments. <u>Check whether this is included in policies and displayed throughout the School, for example: flowcharts showing the processes displayed around the School (staffroom, toilet doors, School office etc.) in more than one place.</u></p>	
4.2	Children going missing from education		
	<p>A child going missing from education is a potential indicator of abuse or neglect.</p>	<ul style="list-style-type: none"> 1) Confirm that the School has an Admissions Register and an Attendance Register, and that these are accurate and kept up to date. 2) Check the School's procedures regarding informing the local authority when a pupil's attendance is irregular or when the pupil has been absent for 10 continuous days or more. 	

Ref Key	Control Process	Testing Procedure	Completed by Date Result
		(NB This does not apply to pupils who have completed the school's final year).	

School

Period 2021/22

Auditor

Date

Type: Schools

Reviewed by

Date

Subject Area: **Procurement [5]**

Ref Key	Control Process	Testing Procedure	Completed by Date	Result
5.1	Official orders are raised and appropriately authorised (Q17 SFVS)			
	<p>Official orders should be raised on SIMS, in order to commit the expenditure on the school's accounting system. All orders should be appropriately authorised by a certifying officer and a signed copy of the official order should be retained on file.</p> <p>Refer to Q17 SFVS "does the School have procedures for purchasing goods and services that meet legal requirements and secure value for money?"</p>	<p>Obtain a copy of the Bank History Report from SIMS, detailing all transactions for the financial year. Using this report, select a random sample of 15 payments (include 2 or 3 high value purchases and a couple of payment to non-staff individuals in your sample) and perform the following tests:</p> <p>1) Check that purchase orders are appropriately certified preferably by the Head Teacher or a Senior Member of staff who has been approved by the Governing Body or Head Teacher, in compliance with the Financial Policy or the Scheme of Delegation. (refer to test 1.1.4)</p> <p>2) Check that, where necessary, for higher value purchases, that approval from the Governing Body or Finance Committee has been obtained.</p>		
5.2	All orders are appropriate for the School			
	<p>All purchases should be in accordance with and appropriate for the needs of the school.</p>	<p>1) For the sample of purchases tested (refer to test 5.1.1) establish whether all transactions tested are for goods and services that are reasonable for the use of the school, (i.e. Orders are only used for goods and services provided to the school.) Individuals must not use official orders to obtain goods or services for private use. School funds must not be used to buy gifts or provide benefits in kind for staff members.</p>		

Ref Key	Control Process	Testing Procedure	Completed by Date	Result
		<p>2) Check the sample of purchases selected for testing to check that there is no evidence of goods being ordered for the private use of employees.</p> <p>3) Review bank account history to identify payments to individuals and confirm that the School has completed a CEST tool assessment for these instances. The CEST should be supported by a formal contract and should have been completed by the school and not the individual engaged.</p> <p>Note: The CEST tool should be filled in by the School and not the individual engaged and the CEST tool should be completed based on the 'contract' (which may just be an order).</p>		
5.3	Written orders are used and are raised in advance of purchases being initiated			
	<p>Official pre-numbered orders should be used for all goods and services except utilities, rents, rates and petty cash payments. Where urgency requires an oral order this should be confirmed by a written order.</p>	<p>For the sample of transactions tested (refer to test 5.1.1), establish whether:</p> <p>1) Official pre-numbered orders are used for all goods and services except utilities, rents, rates and petty cash payments.</p> <p>2) Orders are raised in advance of purchases being initiated.</p> <p>(Where urgency requires an oral order this should be confirmed by a written order.)</p>		
5.4	All goods ordered are received by the School			
	<p>Delivery notes should be checked to the goods/services received and evidenced as such by the officer checking the quality and quantity of the goods, before any invoice is paid. The officer checking the goods/services received should be independent of the person responsible for the administration of orders and payments.</p>	<p>For the sample of transactions tested (refer to test 5.1.1), establish whether appropriate goods/services received checks have been evidenced. (This person should not be not the same person that approved the purchase order in test 5.1 or authorised the invoice in test 5.6)</p>		

Ref Key	Control Process	Testing Procedure	Completed by Date	Result
	Note: Where delivery notes are not obtained, the goods/services received check should be evidenced on the invoice.			
5.5	Appropriate supporting documentation is available			
	All expenditure is supported by a valid receipt or invoice from the supplier.	For the sample of transactions tested (refer to test 5.1.1), establish whether: 1) A valid receipt or invoice is held from the supplier for each transaction. The invoice should be addressed to the school and show an adequate description of the goods or services purchased. Where VAT has been charged by the supplier, check that the invoice or receipt is valid for VAT purposes. 2) Check that the calculations on the invoice are correct and that the payment made agrees to the documented value on the invoice .		
5.5	Appropriate authorisation of Invoices			
	All invoices should be appropriately authorised. The school should maintain a list of authorised signatories, which documents their respective financial limits.	For the sample of transactions tested (refer to test 5.1.1), establish whether all invoices within the sample tested have been appropriately authorised. (Note: In some higher value cases Governing Body or Finance Committee approval may be needed). This person should not be not the same person that carried out the goods received check in test 5.4		
5.6	Value for Money is demonstrated (Q19, Q20 and Q21 SFVS)			
	The school should always consider price, quality and fitness for purpose when purchasing goods and services. Procedures for obtaining alternative quotations or putting contracts out to tender should be documented within the school's Financial Policy (or Purchasing Policy). All	1) For the sample of purchases tested, verify that alternative estimates (either quotes or tenders) have been obtained for all items of major expenditure in line with the school's Financial Policy and the Council's financial regulations.		

Ref Key	Control Process	Testing Procedure	Completed by Date	Result
	<p>policies should comply with the Council's standing orders and financial regulations for schools.</p> <p>As per Q19 of the SFVS, the Governing Body should be given an opportunity to challenge the school's plans for replacing the contracts got goods and services that are due to expire shortly.</p> <p>Q20 of SFVS asks, '<i>Does the School consider collaboration with others, e.g. on sharing staff or joint purchasing, where that would improve value for money?</i>'</p> <p>Q21 of SFVS asks, '<i>Do you compare your non-staff expenditure against the DfE recommended national deals to ensure you are achieving best value?</i>'</p>	<p>(Note: Website print offs or catalogue prices are sufficient to demonstrate market testing).</p> <p>2) Confirm whether the Governing Body challenge contracts due to expire shortly.</p> <p>3) Confirm whether the School has the school has considered:</p> <ul style="list-style-type: none"> i. Collaboration with other schools for shared services / joint procurement ii. The DfE national 'Buying for Schools' deals? 		
5.7	Records are appropriately stored			
	The School should be maintaining proper accounting records throughout the year	Ask the School that these records are being stored securely and in accordance with the school's documents retention policy. Verbal Confirmation Required.		
5.8	Comparison of performance to enable improvement (Benchmarking) (Q17 SFVS)			
	<p>The governors and the staff should have compared the school's performance with that of similar schools, examining reasons for differences and taking action where required.</p> <p>Refer to SFVS question 17, '<i>Does the school benchmark its income and expenditure annually against that of similar schools and investigate further where any category appears to be out of line?</i>'</p> <p>https://schools-financial-benchmarking.service.gov.uk/</p>	<p>Establish whether the School has carried out a benchmarking exercise and if so, the methods used to achieve this.</p> <p>1) Obtain evidence of usage of a benchmarking website (or similar tool used) which allows a comparison of performance with other schools.</p> <ul style="list-style-type: none"> • Consider whether the schools used for comparison are reasonable and suitable. 		

Ref Key	Control Process	Testing Procedure	Completed by Date Result
		<ul style="list-style-type: none"> • Verify that the benchmarking process has identified areas for improvement, and set targets for these improvements. • Verify that the benchmarking exercise had been completed for income and expenditure. <p>2) Ascertain whether these findings have been discussed with the school Governing Body/ Finance Committee.</p> <p>3) Confirm that the benchmarking was conducted in the last 12 months.</p>	
5.9	Authorisation of petty cash reimbursement claims		
	<p>All petty cash expenditure should be approved prior to purchases being made to ensure that the purchase is reasonable. Reimbursement claims should be documented and supported by receipts. VAT should be identified and re-claimed, where applicable. All reimbursement claims should be signed for on authorisation of payment and countersigned by the claimant upon receipt of the reimbursement.</p> <p>All claims should lie within the limit set by the School. Where the School has not set a limit claims should be within the Council's limit (£25).</p>	<p>Through discussion establish whether petty cash is held and if so, through reference to some sample petty cash claims and further discussion establish whether:</p> <p>1) A petty cash limit is in place and adhered to (Note: Look out for consecutive like transactions which may highlight where transactions are being split to deliberately by-pass the limit);</p> <p>2) Petty cash transactions are authorised and supported by appropriate receipts.</p> <p>3) If the School has confirmed that they don't have Petty Cash, check the transaction listing to confirm that no cash withdrawals have been made in the last six months.</p> <p>(Note: Where petty cash claims are for travel it should be made clear on the petty cash voucher that the journey is undertaken on behalf of the school.)</p>	

School:	Period	2021/22	Auditor	Date
Type:	Schools		Reviewed by	Date
Subject Area:	Banking [6]			

Ref Key	Control Process	Testing Procedure	Completed by	Date	Result
6.1	Cheque security is appropriate				
	Cheques should not be pre-signed by any of the authorised cheque signatories and should be used in sequential order.	1) Examine the current cheque books to confirm that cheques have not been pre-signed by any of the cheque signatories. If off-site, take verbal confirmation.			
6.2	Regular bank reconciliations conducted				
	All transactions in the schools account should be reconciled to the bank statement.	<p>1) Check to confirm that regular (at least monthly) reconciliations are carried out between the data held on <u>SIMS/RM Finance</u> and the <u>bank statement</u>. Note the date of the most recent reconciliation.</p> <p>2) Check to verify that all bank reconciliations are signed by the person performing the reconciliation. Confirm that completed bank reconciliations have been independently signed off by someone who understands the reconciliation process (preferably the Head Teacher).</p> <p>3) Obtain an unreconciled item listing report from SIMS/ RM Finance and check that there are no unusual or long standing unreconciled items listed.</p> <p>(Critically examine the listings of unreconciled payments and income for out of date or unusual items (e.g. unreconciled journal entries, duplicate entries, old unreconciled receipts - i.e. anything over 6 months old should be cleared as the bank may not process these.))</p>			

Ref Key	Control Process	Testing Procedure	Completed by Date	Result
		4) Examine the school's bank statements and confirm that the bank account has not been overdrawn in the last six months. (Please note the date, period and overdrawn amount). Ascertain whether the Council has been notified of any overdraft in a timely manner and given approval.		
6.3	Budget cashflow forecasting procedures			
Key	The School bank account should not go overdrawn.	1) Obtain a copy of the school's cashflow forecasting report/s used to predict the school's future cash requirements and in particular to ensure that there will be adequate funds in the school's bank account to cover the future monthly payroll deductions (especially during the next school holiday).		
6.4	Bank signatories are appropriate			
	All cheques should be signed by two authorised signatories, and financial procedure notes should stipulate that supporting documents should be made available to both cheque signatories (i.e. invoice should be presented with the cheque).	Obtain a copy of the authorised signatures list for the school's main bank account and establish whether: 1) Two cheque signatories are required. 2) All signatories included on the bank mandate are current employees of the school (note: governors should not be included as authorised signatories). 3) Confirm that the sample signatures given on the bank mandate are manuscript signatures, (i.e. not initials or symbols). (Note: Instructions to the bank are not sufficient, the School should have obtained confirmation from the bank / Council as to who the current signatories are)		
6.4	Procurement cards are only issued to authorised staff			

Ref Key	Control Process	Testing Procedure	Completed by Date Result
	<p>Procurement Cards are only issued to authorised staff. The Governing Body should authorise all cards prior to these being issued.</p> <p>A signed agreement should be held confirming that the member of staff agrees to the terms of use.</p>	<p>Where applicable:</p> <p>1) Check that the Governing Body has authorised the issue of all procurement cards in use</p> <p>(Note: Debit Cards, Store card and Credit Cards are not permitted by the L.A. Only Council Procurement cards are allowed. No other procurement cards should be used.)</p> <p>2) Confirm that there is an signed agreement in place for staff issued with procurement cards.</p> <p>(Staff members should agree to the terms of use that the card will only be used for School purposes and this should be formally agreed in writing)</p>	
6.5	Reconciliations are conducted for all procurement card expenditure		
	<p>Procurement card statements should be reconciled on a monthly basis.</p>	<p>1) Confirm that regular (monthly) reconciliations are conducted for procurement card expenditure by an independent member of staff</p> <p>(Reconciliations should be conducted between items on card statements and receipts. A valid receipt should be held for all transactions listed.)</p> <p>2) Examine expenditure listings for 1 month and confirm that items of expenditure are reasonable, i.e. for School purposes.</p>	

School:	Period	2021/22	Auditor	Date
Type:	Schools		Reviewed by	Date
Control Area:	Information Governance [7]			

Ref Key	Control Process	Testing Procedure	Completed by	Date	Result
7.1	Governance arrangements				
	In order to comply with the Data Protection Act (DPA) 2018 and UK General Data Protection Regulations (UK GDPR) and help ensure the protection of personal data, appropriate information governance should be in place.	<p>Through discussion and examination of relevant documents establish:</p> <ol style="list-style-type: none"> 1) Whether a GDPR project plan was developed that is used to track the activities required to comply with GDPR. 2) Whether the School has an information governance policy (or equivalent) and whether this has been updated to comply with GDPR. This should include an updated Data Protection Policy and Security Breach Procedure; including scenarios or descriptions of what is considered a breach and that these must be reported internally without delay. 3) Whether HR Practices and Procedures have been reviewed and brought up to date to include the consequences of any breaches (written warning etc.). 4) Are procedures in place for when someone exercises their rights? The main one is being able to request a copy of the info held about them, but it also gives them the right to do things like request that info is corrected or deleted (if inaccurate) 5) How are information security breaches reported and dealt with? 6) Does the School have a document retention policy? (For example Governing Body records 			

Ref Key	Control Process	Testing Procedure	Completed by Date	Result
		<p>should be retained on site for 7 years, personnel records, books of account, child records, etc).</p> <p>7) Ask the School how security of information taken home by teachers (if allowed) is ensured, both electronically and physically.</p> <p>8) Ask the School are laptops and USB memory sticks encrypted?</p> <p>9) Ask the School how are laptops or USBs disposed of?</p>		
7.2.	Data Protection Arrangements			
	<p>To ensure that data held at the establishment is in accordance with the requirements of the Data Protection Registrar, the school should maintain a current entry in the Data Protection Register. This will be evidenced by the issue of a certificate to the school, which will show the dates of the period covered by the registration.</p> <p>https://ico.org.uk/registration/new</p>	<p>Check the ICO website to confirm if the School has been registered as a Data Controller/Processor:</p> <p>https://ico.org.uk/ESDWebPages/Search</p>		
7.3	Roles and Responsibilities			
	<p>The School should have a designated Data Protection Officer (DPO), who is appropriately skilled to do the role, has a route to report directly to senior level and needs to be involved in any important DP issues (breaches etc.).</p> <p>https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/accountability-and-governance/data-protection-officers/</p>	<ol style="list-style-type: none"> 1) Establish whether the School have a designated Data Protection Officer (DPO). 2) Establish whether the person is appropriately skilled to do the role through conversation with School and documented information provided to the School. 3) Does the DPO report directly to senior level in the School? 4) Have their main tasks been appropriately set out? 		
7.4	Organisational Awareness and Training			

Ref Key	Control Process	Testing Procedure	Completed by Date Result
	<p>Guidance should have been provided to staff on the DPA 2018 and UK GDPR requirements.</p> <p>Staff don't need to know the legislation back to front, but should be reminded on a periodic basis of the key factors around keeping info secure (such as locking away sensitive paper files) and knowing who to raise anything with if they think there's an issue/ breach.</p> <p>Checks should be regularly made to ensure compliance</p>	<p>Has guidance been provided to staff on the DPA 2018 and UK GDPR requirements?</p> <p>Are staff reminded on a periodic basis of the key factors around keeping info secure (such as locking away sensitive paper files) and knowing who to raise anything with if they think there's an issue/ breach?</p> <p>Are checks regularly made to ensure compliance?</p>	
7.5	Data Documentation, Classification and Management		
Key	<p>An Information Asset Register (IAR) has been created/updated. This details key types of data / information within the School, what it is used for, where it's stored, who it is shared with (if it is), how long it is kept it for and how it is protected.</p> <p>This should include:</p> <ol style="list-style-type: none"> Paper files Emails Registers Club lists Trip records Sickness records Staff and governor details Salaries Third party data held or shared 	<p>Obtain evidence that an adequate IAR is in place.</p>	
7.6	Privacy and Consent		
7.6.1	<p>The School has reviewed / created a Privacy Notice. This includes:</p>	<p>Has the School created comprehensive Privacy Notices for:</p>	

Ref Key	Control Process	Testing Procedure	Completed by Date Result
	<ul style="list-style-type: none"> a) The School's name and contact details b) Contact details of the data protection officer c) The right to complain to the ICO d) Why you are processing the personal data and the legal basis for the processing e) Details of any other organisations you may share the data with f) How long the data will be stored for, or the criteria it would be based on (retention schedule etc) g) Whether they need to provide personal data based on a statutory or contractual requirement, h) That they can withdraw consent at any time i) If there will be any automated decision-making, including profiling, and that they have the right to meaningful information about the logic involved j) Their various rights around their data: the right to request access to a copy, to request that it is rectified or erased, to restrict processing, to object to processing, to receive data in a portable format. 	<ul style="list-style-type: none"> a) Pupils b) Parents / Carers c) Employees d) Governors <p>(Note: Every time data is collected or a form is filled in there should be a privacy notice – or reference to the Schools general privacy notice – this is not about transparency)</p>	
7.6.2	<p>The school has reviewed the use of consent.</p> <p>GDPR strengthens the rules regarding how to get and record consent. The trust makes it completely clear what individuals are consenting to, their consent must be unambiguous (positively opting-in) and they must be made them aware they can withdraw their consent at any time.</p> <p>NB: this only relates to getting consent to collect, record and use personal data.</p> <p>Where the collection and use of personal data for is linked to statutory responsibilities around education provision or</p>	<p>Ask the School whether they have reviewed the use of consent?</p> <p>Are procedures to manage consents in place, including topics such as storage, periodic review, expiry and refresh?</p> <p>(Note: Personal data can only be collected where the School has a lawful basis to do so. The DPA 2018 and UK GDPR provides 5 options, if none are applicable, the School will then need to use consent)</p>	

Ref Key	Control Process	Testing Procedure	Completed by Date Result
	<p>to role as an employer, consent is not required (just why the info is needed).</p> <p>Procedures to manage consents are in place. These include topics such as storage, periodic review, expiry and refresh.</p> <p>The lawful bases for processing are set out in Article 6 of the UK GDPR. At least one of these must apply whenever you process personal data:</p> <p>(a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose.</p> <p>(b) Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.</p> <p>(c) Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).</p> <p>(d) Vital interests: the processing is necessary to protect someone's life.</p> <p>(e) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.</p> <p>(f) Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)</p>		
7.7	Third party contracts		
	<p>Contracts with third parties have been reviewed. For example, school meal caterers, third party IT providers who host or have access to personal data, such as cloud service providers or IT helpdesks, payroll, after school</p>	<ol style="list-style-type: none"> 1. Have contracts with third parties been reviewed? 2. Do contracts include a data sharing agreement (where applicable) covering responsibilities on 	

Ref Key	Control Process	Testing Procedure	Completed by Date	Result
	clubs, alternative education (counsellors, play therapists, ASD support) etc. Any contracts with anyone that involves the use of school's personal data (staff info, pupil info etc) should include a data sharing agreement covering responsibilities on complying with GDPR, keeping info secure and confidential etc.	complying with GDPR, keeping info secure and confidential etc.?		
7.8	Back up procedures and business continuity plan in place (Q8 SFVS)			
	The Head Teacher should ensure that data is backed up regularly and that all back-ups are securely held (preferably off-site). SFVS Question #8 requires that a business continuity or disaster recovery plan is present and up to date.	1) Establish and document back-up procedures. Confirm that back-ups are held securely. 2) Confirm that the school has a business continuity plan that is up to date. Confirm that the Governing Body has approved the plan in the previous 12 months.		
7.9	Virus protection			
	The Head Teacher should ensure that systems are in place to safeguard school software and data against computer viruses.	Ask the School and document the systems that are in place to safeguard school software and data against computer viruses and ransomware.		
7.10	Authorised access			
	Computer systems used for school management should be protected by password security to ensure that only authorised staff have access. Passwords should be changed regularly.	Through discussion establish whether: a) a username and password is required for users to access the system. b) the system prompts users to change passwords on a regular basis. c) users on the system have had their access formally authorised. d) access rights for leavers are disabled. N.b. Generic users such as 'Sysman' or Head Teacher should be disabled.		

Ref Key	Control Process	Testing Procedure	Completed by Date	Result
7.11	Loans of equipment properly controlled and recorded (Q22 of SFVS)			
	<p>There should be effective controls in place to ensure that the removal of all equipment from the school premises is monitored and logged.</p> <p>Teachers should sign laptops for teachers' forms to verify that they are aware the terms and conditions of use and on returning the laptops these forms should evidence the receipt back into school of the machine.</p> <p>As per Q22 of the SFVS the School should ensure it maintains its premises and other assets to an adequate standard and make best use of capital monies for this purpose.</p>	<p>1) Identify and document the system for approving and recording the loan of equipment (laptops & iPads) and assess whether these procedures are adequate. This should include a process to ensure that returned machines are receipted and records maintained of how machines are reallocated.</p> <p>2) For a sample of items of equipment on loan at the time of the audit test for the following:</p> <ul style="list-style-type: none"> a) Authorised by an appropriate officer b) Period of loan specified c) Responsibility/liability clearly explained <p>3) Confirm how the School ensures it maintains its premises and other assets to an adequate standard.</p>		

School:	Period	2021/22	Author	Date
Type:	Schools		Reviewed by	Date
Control Area:	Income [8]			

Ref Key	Control Process	Testing Procedure	Completed by Date	Result
8.1	Income via online payment systems			
	The majority of School income is now taken online through online payment applications	<p>Ascertain whether the School uses an on-line payment system for parents to make payments to the school and note what type of payments are made using this system (typically this will be school meal income and school trip contributions).</p> <p>1) Establish how the on-line account is checked and reconciled to the SIMs system and school bank account and assess the appropriateness of this. Invariably, the on-line account will be used to update SIMs. In particular consider:</p> <ul style="list-style-type: none"> • Whether the checks are frequent enough (this will depend on the income value); • How missing income is determined and subsequently followed up. • Is there any form of second or double check (this may be concurrent with the monthly bank reconciliation)? 		
8.2	Income should be receipted and fully documented			
	All income should be adequately receipted and recorded within the accounting records.	<p>1) Note the types of sundry (<u>cash</u>) income paid into the bank according to the bank paying-in slip counterfoils.</p> <p>2) <u>Pick a sample and v</u>erify that supporting records are being maintained to record the person from</p>		

Ref Key	Control Process	Testing Procedure	Completed by Date	Result
		whom the income has been received, the date received, the amount and the date the income is banked.		
8.3	Safeguarding of income received			
	Cash and cheques should be securely locked away (once accounted for) to safeguard against loss and theft.	Check to confirm that cash and cheques are securely locked away to safeguard against loss and theft.		
8.4	Authorisation of lettings (Test Schedule)			
	All lettings should be authorised by the Head Teacher within a framework determined by the Governing Body and should be recorded in a register or diary.	<p>Obtain a copy of the school's letting policy and establish whether:</p> <ol style="list-style-type: none"> 1. The policy is up to date and includes a list of current fees and charges, which is reviewed and approved annually by the Governing Body. 2. Test 3 (primary), or 5 (secondary) lets to ensure: <ol style="list-style-type: none"> a) There is a hirer's agreement; b) There is an up to date copy of the hirer's public liability insurance or that insurance is charged with the letting fee. 3. For a sample of 3 (primary), or 5 (secondary) lets: <ol style="list-style-type: none"> a) Ensure that an invoice was issued and that charges are in line with current scale. b) Issue was within an appropriate timescale of the let - in advance for one off lets; and c) Note the date of receipt and the date of banking and ensure that banking is being undertaken within a reasonable timescale. d) Check the sample to bank statements 4) All lettings are authorised by the Head Teacher and documented on booking forms (or equivalent 		

Ref Key	Control Process	Testing Procedure	Completed by Date	Result
		documentation). Note whether the booking forms appropriately indemnify the school.		
8.5	School meals debts are reviewed and action is taken where appropriate.			
	<p>School meals are paid for using an online payment system. The School can view each pupil's school meal account and determine the balance on the account.</p> <p>Where pupil meal accounts are in debt the School should take appropriate action to recover the debt.</p> <p>Where negative balances remain on School meal accounts this debt becomes the responsibility of the School.</p>	<p>Obtain a listing of School meals debts for pupils and note the value of the debts.</p> <p>Select 5 pupils with debts on their meal accounts and establish whether there is evidence that the School has taken appropriate action to recover the debt.</p>		

School:	Period	2021/22	Auditor:	Date
Type:	Schools		Reviewed by	Date
Control Area:	Health and Safety [9]			

Ref Key	Control Process	Testing Procedure	Completed by	Date	Result
9.1	Health and Safety Compliance Checks undertaken				
	To ensure that adequate health and safety compliance checks have been undertaken by the School and that these are up to date.	Refer to the schedule on page 41 and ask the School to complete the checklist. Verify the checklist completed to supporting documents held by the School.			

School:	Period	2021/22	Auditor:	Date
Type:	Schools		Reviewed by	Date
Control Area:	School Fund Accounting [10]			

Ref Key	Control Process	Testing Procedure	Completed by	Date	Result
10.1	Appropriate accounting records maintained for school fund transactions (Q28 SFVS)				
	To ensure that adequate and reliable accounting records are being maintained and that there is an annual review of the accounts as per SFVS Q28.	1) Identify who maintains the school's School Fund Account 2) Determine the accounting system used to maintain the School Fund.			
10.2	Annual independent audit review of the accounts(Q8 SFVS)				
	To ensure that adequate and reliable accounting records are being maintained and that there is an annual review of the accounts as per SFVS Q28.	1) Identify and comment whether income and expenditure and fund balance statements have been prepared and audited (obtain copies of statements and the auditor's report/opinion) in the last 12 months . 2) Identify and comment on whether the audited statements have been presented to the Governing Body (obtain a copy of the Governing Body Minutes) 3) Establish what the fund is used for (school trips, charity collections etc.) and where the fund has a high balance, seek an explanation as to how it was received and how it will be spent.			