Bronte Academy Trust

Financial Assurance Framework Policy

Reviewed By	Approved By	Date of Approval	Version Approved	Next Review Date
Working Party	JB	23 April 18		23 April 19
DH	JB	13 Jan 20		13 Jan 21
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1 PURPOSE AND STATUS

Bronte Academy Trust is a charitable company limited by guarantee. The Trust Board is collectively accountable for the governance and operation of the Trust and for ensuring compliance with company law, charity law, the Funding Agreement, the Academy Trust Handbook and other applicable requirements.

The purpose of this framework is to provide the Board with a structured view of the principal sources of assurance across the Trust. It applies to all four academies - Haworth Primary School, Lees Primary School, Oakworth Primary School and Oldfield Primary School - and to all central Trust functions.

This framework does not transfer accountability from the Board. Responsibilities may be delegated through the Scheme of Delegation, but accountability remains with the Board. Local Governing Bodies and academy leaders operate within the authority delegated to them.

2 REGULATORY FRAMEWORK

The Trust will comply with the edition of the Academy Trust Handbook in force at the relevant time. This policy reflects the Academy Trust Handbook 2026, effective from 1 October 2026. Where an external requirement changes, the new requirement takes precedence over this policy and the policy will be updated at the earliest practical opportunity.

- The Trust's Articles of Association and Funding Agreement.
- The Academy Trust Handbook and its Schedule of Musts.
- The Academies Accounts Direction, model accounts and auditor framework applicable to the relevant financial year.
- The Companies Act 2006, applicable charity law and the Charities Statement of Recommended Practice.
- HM Treasury Managing Public Money and the Seven Principles of Public Life.
- The Procurement Act 2023 and associated regulations, where applicable.
- DfE guidance on internal scrutiny, risk management, related-party transactions and financial management good practice.

3 ASSURANCE PRINCIPLES

The Trust's assurance arrangements will be proportionate to its size, complexity and risk profile. Assurance will be based on evidence and will support timely action rather than operate as a retrospective compliance exercise.

- Regularity - transactions comply with the Trust's legal, contractual and delegated authorities.
- Propriety - decisions meet high standards of public conduct, integrity and openness.
- Feasibility - proposals are capable of being implemented sustainably and to the intended timetable.
- Value for money - resources are used economically, efficiently and effectively.
- Accountability - responsibilities, approvals and evidence are clear and retained.
- Risk-based assurance - scrutiny is directed towards the areas of greatest financial and non-financial risk.

- Independence - assurance is obtained from sources sufficiently independent of the activity being reviewed.
- Continuous improvement - findings are tracked, implemented and used to strengthen controls.

4 ROLES AND RESPONSIBILITIES

4.1 Members

- Approve the Trust's external auditor, except where the Companies Act 2006 permits the trustees to appoint.
- Receive the audited annual report and financial statements.
- Use their powers under the Articles where governance is failing or where intervention is otherwise required.

4.2 Board of Trustees

- Retain collective accountability for the Trust and ensure compliance with regulatory, contractual and statutory requirements.
- Ensure regularity, propriety, feasibility and value for money, and take ownership of financial sustainability and going-concern responsibilities.
- Approve the annual budget, three-year financial plan, annual report and accounts, key financial policies and the programme of internal scrutiny.
- Maintain oversight of the Trust's risk register, conducting a full review at least annually.
- Ensure that delegated responsibilities and limits are documented, understood and monitored.
- Receive management accounts, committee reports, internal scrutiny findings and external audit findings, and ensure timely corrective action.

4.3 Risk and Finance Committee

As Bronte Academy Trust has annual revenue income below the threshold requiring a separate audit and risk committee, the combined Risk and Finance Committee fulfils the audit and risk committee functions. When audit matters are discussed, Trust employees attend to provide information but do not participate as committee members.

- Oversee financial strategy, budgets, management accounts, cash flow, reserves and financial risks.
- Oversee and approve the annual risk-based internal scrutiny programme and the people or organisations who will deliver it.
- Review the risk register when setting the scrutiny programme and ensure financial and non-financial risks are addressed.
- Receive a report from the internal scrutineer at each relevant meeting and monitor implementation of recommendations.
- Review the external audit plan, annual report and accounts, auditor findings and management responses.

- Assess external auditor effectiveness and resources and report annually to the Board and Members with recommendations on reappointment, dismissal or retendering and remuneration.
- Report to the Board on the adequacy of internal control, risk management and assurance arrangements.

4.4 Chief Executive Officer / Accounting Officer

- Carry personal responsibility to Parliament and DfE for the Trust's financial resources.
- Assure the Board, DfE, Parliament and the public of high standards of regularity, propriety, feasibility and value for money.
- Maintain oversight of financial transactions, assets, banking arrangements, systems and accounting records.
- Complete and sign the annual statement on regularity, propriety and compliance.
- Notify the Board in writing where proposed action is incompatible with the Articles, Funding Agreement, Academy Trust Handbook or Accounting Officer duties, and escalate to DfE where required.
- Notify the Board if the Trust's ability to operate as a going concern is at risk and ensure DfE is notified where required.
- Maintain the financial risk register entries, compliance calendar and action trackers, and report significant concerns promptly

4.5 Chief Financial Officer

- Lead the Trust's detailed financial procedures and provide professional financial advice to the CEO, Board and committees.
- Maintain effective budgeting, accounting, cash management, payroll oversight, procurement, financial reporting and year-end arrangements.
- Prepare monthly management accounts comprising an income and expenditure account with budget variances, cash-flow forecasts and a balance sheet.
- Ensure financial information is accurate, timely, supported by evidence and subject to appropriate review and reconciliation.
- Coordinate internal scrutiny and external audit while protecting the independence of the assurance providers.
- Ensure statutory financial returns and notifications are complete and submitted by the applicable deadlines.

4.6 Headteachers (alongside the CEO and CFO)

- Manage delegated budgets within the Scheme of Delegation and Financial Regulations.
- Monitor staffing, curriculum, income, expenditure, commitments and local risks, and respond promptly to adverse variances.
- Ensure purchasing, recruitment, payroll changes, income collection, asset management and authorisations follow Trust controls.
- Provide accurate information and evidence for management accounts, forecasts, returns, audits and scrutiny reviews.

- Escalate suspected fraud, irregularity, control failure, financial pressure or conflicts of interest immediately.

4.7 Local Governing Bodies

Local Governing Bodies provide local oversight and challenge within their delegated remit. They receive relevant financial and risk information, monitor academy priorities and escalate concerns to the Board. They do not replace the Board's corporate accountability or exercise powers not delegated through the Scheme of Delegation.

4.8 Governance Professional

The Governance Professional supports compliant decision-making by maintaining accurate minutes, declarations, registers, committee records and the governance calendar, and by ensuring that reserved and delegated decisions are directed to the correct body.

5 FINANCIAL PLANNING AND MONITORING

5.1 Budget setting

The CFO will coordinate a rolling three-year financial plan. Headteachers will contribute academy-level plans based on pupil numbers, staffing, curriculum needs, known commitments, funding assumptions, estates priorities and identified risks. The Risk and Finance Committee will scrutinise the plan before recommendation to the Board for approval.

Budgets must be aligned with educational priorities, integrated curriculum and financial planning, reserves policy, estates planning and the Trust risk register. Assumptions and sensitivity analysis will be recorded.

5.2 Monthly management accounts

Management accounts will be prepared every month and will include income and expenditure against budget, explanations of material variances, cash-flow forecasts and a balance sheet. They will be shared with the Chair of Trustees monthly and considered by the Board when it meets. The Risk and Finance Committee will undertake detailed scrutiny under its terms of reference.

The Trust uses a tolerance of plus or minus 5 per cent as a management indicator. This does not prevent investigation of smaller variances that are material by value, recurring, unusual or indicative of risk. Corrective action, revised forecasts and accountable owners will be recorded.

5.3 Cash, reserves and going concern

- Cash will be monitored and forecast so that the Trust does not become overdrawn or enter into borrowing without authority.
- The Board will approve and review a reserves policy and ensure reserves are sufficient, purposeful and supported by plans.
- The Accounting Officer will report promptly to the Board where the Trust's ability to operate as a going concern may be at risk.
- Investments and savings will prioritise security and liquidity over financial return and will be managed under an approved investment policy.

6 Internal control framework

The CFO will maintain documented financial procedures proportionate to the Trust's operations. Controls will include the following.

Control area	Minimum assurance requirement
Delegation and approval	Current Scheme of Delegation and Financial Regulations; documented approval limits; evidence of authorisation.
Segregation of duties	No single individual controls initiation, approval, payment and reconciliation. Bank accounts, systems and records are operated by more than one person.
Budgetary control	Approved budgets, monthly reporting, variance investigation, forecast updates and documented corrective action.
Banking and cash	Independent bank reconciliation, controlled access, dual authorisation and regular cash-flow forecasting.
Income	Complete recording, prompt banking, debt monitoring, reconciliations and approval of write-offs within delegated limits.
Purchasing and contracts	Business need, budget approval, proportionate competition, Procurement Act compliance, value-for-money evidence, contract oversight and conflict checks.
Payroll and people	Authorised appointments and variations, establishment checks, payroll reconciliation and independent review of changes.
Assets and estates	Asset records, security, disposals approval, planned maintenance and assurance over statutory estates compliance.
Systems and data	Role-based access, prompt leaver removal, backups, cyber controls, change control and review of privileged access.
Journal entries and reconciliations	Adequate narrative and evidence, appropriate authorisation, timely control-account reconciliations and review.
Related parties	Complete declarations, register checks, DfE reporting or approval where required, at-cost compliance and transparent decision-making.
Business continuity	Tested continuity arrangements covering finance, payroll, banking, systems, key suppliers and records.

7 RISK MANAGEMENT

The Board retains overall responsibility for risk management. The Trust will maintain a risk register covering its full operations, including financial, educational, safeguarding, people, estates, cyber, legal, operational and reputational risks. The Board will conduct a full review at least annually, with more frequent review by the Risk and Finance Committee and responsible leaders.

Each material risk will identify an owner, inherent and residual risk assessment, controls, further action, deadline and assurance source. The internal scrutiny programme will be informed by the risk register. Contingency and business-continuity arrangements will form part of the Trust's risk management system.

8 INTERNAL SCRUTINY

The Trust will maintain an independent, objective and risk-based programme of internal scrutiny covering financial and non-financial controls. It will evaluate control design and compliance, advise the Board on weaknesses and provide assurance that risks are identified, reported and managed.

- The Risk and Finance Committee will approve written terms of reference and an annual programme providing coverage across the year.
- The programme will be informed by the risk register, previous findings, external audit, DfE reviews and significant organisational changes.
- Work will be performed by suitably qualified or experienced people who are independent of the activity reviewed. It will not be performed by members of the senior leadership or finance team.
- The Trust may use a bought-in internal audit service, an in-house internal auditor, a suitably qualified non-employed trustee, an independent peer review by another trust CFO, or specialist providers for non-financial areas.
- Internal scrutineers will report directly to the Risk and Finance Committee and provide updates at each relevant meeting.
- Findings will be made available promptly to all trustees. Management actions will identify an owner, deadline and status and will be followed through to closure.
- An annual summary report for the year ended 31 August will set out work completed, key findings, recommendations and conclusions. It will be submitted to DfE by 31 December with the audited accounts.
- The governance statement will explain which internal scrutiny options were used and why; the findings will inform the Accounting Officer's annual statement.

9 EXTERNAL AUDIT AND ANNUAL ACCOUNTS

The Trustees will appoint the external auditor. The audit and regularity engagement will be in writing and separate from any additional services. The Trust should retender the external audit contract at least every five years.

The external auditor will provide a statutory opinion on whether the financial statements give a true and fair view. Acting separately as reporting accountant, the auditor will provide a regularity assurance conclusion addressed jointly to the Trust and DfE.

Requirement	Deadline or frequency
Prepare annual report and financial statements	For each year ending 31 August
Board approval and signature	In sufficient time to meet statutory submission deadlines
Submit audited accounts, management letter and internal scrutiny summary report to DfE	By 31 December
Provide annual report and accounts to every Member and anyone requesting a copy	Following approval
Publish annual report and accounts on the Trust website	As soon as possible after approval and by 31 January
Publish MAT funds-distribution summary statement	By 31 January, accompanying the annual accounts
File accounts with Companies House	By 31 May for a 31 August year-end, subject to Companies Act requirements
Review external auditor effectiveness and recommendation to Members	Annually
Retender external audit	At least every five years

10 Statutory returns and regulatory assurance

- The Trust will complete and submit all DfE financial returns by the published deadlines, including the budget forecast return and any accounts return or supporting return required for sector reporting.
- The Trust will complete the School Resource Management Self-Assessment Checklist by the specified annual deadline. The Financial Management and Governance Self-Assessment applies to new operational trusts and must be submitted within three months of opening the first academy.
- Information submitted to DfE that affects funding will be subject to appropriate review so that it is accurate and complies with funding criteria.
- The Trust will notify DfE of relevant governance changes within 14 calendar days and update its website and Companies House records where applicable.
- The Trust will cooperate with DfE financial management reviews, funding audits, investigations and requests for information.

11 FRAUD THEFT IRREGULARITY AND WHISTLEBLOWING

The Trust has zero tolerance of fraud, theft, bribery and deliberate financial irregularity. Prevention and detection are the responsibility of everyone working for or governing the Trust. Suspicions must be reported immediately under the anti-fraud, whistleblowing or escalation arrangements and must not be investigated informally where doing so could compromise evidence or due process.

- The Board must notify DfE as soon as possible of fraud, theft or irregularity exceeding £5,000 individually or £5,000 cumulatively in a financial year.
- Unusual fraud must be reported to DfE regardless of value.
- Material cybercrime must be reported to DfE where required by the Academy Trust Handbook, alongside reports to the appropriate authorities and insurers or RPA.
- Losses, write-offs and special payments will be considered and approved only within the Trust's delegated authority and DfE approval will be obtained where required.
- The Board will approve a whistleblowing procedure, publish it on the Trust website, ensure staff know how to raise concerns and ensure concerns are handled properly and fairly.

12 CONFLICTS OF INTEREST AND RELATED PARTIES

Members, trustees, local governors, the Accounting Officer and relevant staff must declare interests at least annually and whenever circumstances change. Meeting-specific conflicts must be declared, recorded and managed. Registers will be kept up to date and published where required.

Before entering a related-party agreement, the Trust will establish need, value for money, compliance with the at-cost rules and whether DfE notification or prior approval is required. The Chair and Accounting Officer must ensure that their ability to control or influence decisions does not conflict with these requirements.

13 ASSURANCE REPORTING AND ESCALATION

Assurance is only effective when concerns lead to action. Significant weaknesses, suspected irregularity, breaches, missed deadlines, unmanageable financial pressures and risks outside tolerance must be escalated promptly rather than held for the next scheduled meeting.

Issue	Initial escalation	Further reporting
Material budget variance or cash concern	CFO to CEO and relevant headteacher	Risk and Finance Committee; Board if material or urgent
Control failure or overdue high-risk action	Responsible lead to CFO and CEO	Risk and Finance Committee and internal scrutineer
Suspected fraud theft or irregularity	CEO/Accounting Officer and Chair; preserve evidence	Board, DfE and other authorities where thresholds or circumstances require
Accounting Officer concern about proposed Board action	Written advice from Accounting Officer to Board	Immediate written notification to DfE if the Board proceeds and the concern remains
Going-concern risk	CFO to Accounting Officer and Chair immediately	Board ownership and DfE notification where required

Issue	Initial escalation	Further reporting
External or internal audit high-priority finding	CFO and responsible action owner	Risk and Finance Committee; all trustees promptly
Breach of delegated authority or related-party rules	CFO to Accounting Officer and Chair	Risk and Finance Committee, Board and DfE where required

14 ASSURANCE MAP

The following map summarises the minimum recurring assurance expected by the Board. It should be read with the annual governance, finance and compliance calendars.

Area	Responsible owner	Principal evidence	Frequency and recipient
Strategy and budget	CEO and CFO	Three-year budget, assumptions, sensitivity analysis and recovery actions	Annual approval; updates to Risk and Finance Committee and Board
Financial performance	CFO	Monthly management accounts, variance commentary, forecasts, cash flow and balance sheet	Monthly to Chair; each meeting to Risk and Finance Committee and Board
Academy budget control	Headteachers and CFO	Academy reports, staffing and commitment reviews, corrective actions	Monthly management review; committee reporting as scheduled
Risk management	CEO, CFO and risk owners	Risk register, action plan, continuity arrangements and incident reports	Regular committee review; full Board review at least annually
Internal controls	CFO and process owners	Reconciliations, approvals, access reviews, exception reports and procedure compliance	Monthly or termly depending on control; exceptions escalated promptly
Internal scrutiny	Risk and Finance Committee	Risk-based plan, reports, action tracker and annual summary report	Across the year; annual report by 31 December

Area	Responsible owner	Principal evidence	Frequency and recipient
External audit	External auditor and Risk and Finance Committee	Audit plan, annual accounts, management letter and regularity report	Annual to committee, Board, Members and DfE
Procurement and contracts	CFO and budget holders	Competition records, approvals, conflict checks, contracts and performance reviews	Per transaction; contract and compliance review at least annually
Payroll and workforce	CEO, CFO and HR leads	Establishment control, payroll reconciliation and approved changes	Monthly; exceptions reported promptly
Estates and assets	Strategic Site Lead and academy leaders	Condition surveys, compliance records, asset register and action plans	Termly or risk-based; committee and Board reporting
Systems cyber and data	IT Lead and DPO	Access reviews, backup evidence, incident logs, cyber and data-protection assurance	Termly and after incidents; Board assurance at least annually
Related parties and interests	Governance Professional and CFO	Registers, declarations, meeting minutes and DfE submissions or approvals	At least annually and on every change or transaction
Statutory returns	CFO and accountable data owners	Compliance calendar, review evidence and submission receipts	By each statutory deadline; exceptions to CEO and Chair
Fraud and whistleblowing	Accounting Officer and Chair	Registers, investigations, notifications and lessons learned	Immediate escalation; annual policy and control review

15 RECORD KEEPING

The Trust will retain sufficient records to demonstrate the basis of decisions, approvals, reconciliations, scrutiny, challenge and follow-up action. Records will be held securely, remain accessible for audit and comply with the Trust’s retention schedule, data-protection obligations and Funding Agreement requirements.

16 MONITORING AND REVIEW

The CFO will review this framework at least annually and after material changes to the Academy Trust Handbook, Accounts Direction, Funding Agreement, Trust structure, risk profile or assurance arrangements. The Risk and Finance Committee will recommend substantive changes to the Board.

Compliance will be monitored through management accounts, the compliance calendar, risk register, internal scrutiny programme, external audit, action trackers and committee reporting. The Board will receive assurance on the operation of the framework and will require identified weaknesses to be addressed within agreed timescales.

17 MONITORING AND REVIEW

This Financial Assurance Framework is reviewed annually by the Trust Board. Any changes to this policy will be communicated to all relevant stakeholders.

Declaration of Responsibility

This Financial Assurance Framework Policy was reviewed and formally adopted by Bronte Academy Trust on

..................................21 Sep 2026..............................Date

R. Norris

....Signed Chair of Trustees

....Signed Chief Executive Officer