



BOARD OF TRUSTEES

PUBLIC MINUTES

Date	:	14 July 2020	
Time	:	14:00	
Venue	:	Virtual Meeting via Zoom	
Present	:	Asha Choolhun [AC]	Trustee
		Clive-Anthony Douglas [CAD]	Trustees / Chair
		Phillip Minns [PM]	Trustee / Vice-Chair
		Nina Panayis [NP]	Trustee
		John Rolfe [JR]	Trustee
		Rosemary Tehrani [RT]	Trustee
Apologies	:	Mohammed Mamun [MM]	Trustee
		Patricia Regis [PR]	Trustee
In attendance	:	Tom Canning OBE [TC]	Chief Executive Officer
		Sarah Lack [SL]	Deputy CEO and Headteacher of Cleves
		Steven Lock [SGL]	Chief Finance and Operating Officer
		Rose Nelson [RN]	Virtual Chief Finance Officer
		David Lightman [CLERK]	Clerk

1. MEETING OPENING

- 1.1 The Chair welcomed everyone to the meeting. The board welcomed CC to her first meeting.
- 1.2 Apologies were received from MM and PR.
- 1.3 The Clerk noted that the meeting was quorate.

2. DECLARATION OF INTERESTS, PECUINARY OR OTHERWISE IN RESPECT OF ITEMS ON THE AGENDA

- 2.1 There were no declarations of interest on any item on the agenda.

3. CONSTITUTION AND MEMBERSHIP LIST

- 3.1 SGL reported that there is now a full board.
- 3.2 SGL reported that CAD and PM are up for re-election in November.

4. PUBLIC MINUTES OF THE PREVIOUS BOARD MEETING AND ACTIONS ARISING

- 4.1 The minutes of the previous meeting held on 2 April 2020 were **AGREED** and **RATIFIED** as a correct record.

5. MAIN BUSINESS

5.1 Update from the CEO

The CEO gave a verbal update on the actions taken by the Trust since the announcement to close schools and all of the complexities that has entailed for the 7 schools. Details are contained in the CEO Report. TC said that there has not been one Covid case across the whole trust.

The trust has offered blended learning across the schools and from September there will be a full academic year with a recovery period for the first term.

Expecting interim visit from OFSTED after September for Monega. All other school visits are scheduled between 2020 and 2021.

TC shared a letter from Baroness Berridge to thank the trust for all the work it has done during the pandemic.

AC asked about the plan for wraparound care from September. TC said that schools need to open up again to allow parents to get back to work. Breakfast club will open asap, and the trust will be able to provide wraparound care, apart from Tollgate.

TC said that the trust has been advertising for the headship of Cleves Primary School to release SL to work across the trust in her capacity as Deputy CEO. SL said that the Trust had decided to appoint Nneoma Onyemachi who gave a brilliant interview.

TC added that the Headteacher at Shaftesbury had been working with TC to support the Lubuvitch Jewish Multi-Academy Trust in North London. TC has been asked by the DfE if GH can be the interim CEO from September, initially for two terms.

JO, current Deputy Headteacher at Shaftesbury will be made Acting Headteacher.

TC said that the trust is 3.5 years in, now with 7 schools, the schools have progressed and we're ready to grow.

TC, CAD and SGL met with the Regional Schools Commissioner via Zoom to discuss growth strategies.

CAD reported back on the wider conversation on trust growth. In the meeting with the Schools Commissioner, we were able to demonstrate that the trust has the capacity and capability to expand in both primary and secondary across Kent, M25, Essex and Cambridge. CAD said it was a very good conversation and she was asked to come back within three months with a response. TC added that they are putting together a map of the areas the Trust will be willing to operate in.

TC and SGL met with Cyril Jackson Primary School in Tower Hamlets who are interested in converting and are talking to a number of trusts.

Trustees thanked the CEO for his update.

5.2 Finance update

RN presented to Trustees the Monthly Financial Management update for May 2020.

While it has been a very challenging year, Boleyn Trust has been very robust. At the top level the year will end with a surplus of £1.65m. Funding was budgeted at £31m but will end up with 32m. Staffing costs budgeted £21.4m and will end with £23.6m, 10% up on budget but still remains at 73% of funding. Other expenditure went down by £200k.

It was noted that the Trust and constituent schools remain in a healthy financial position and that in light of the current pandemic, this would increase further due to the non-spend of schools at this time. RN then gave an executive summary of the schools' individual positions:

Setting	Full Year Surplus	Carried Forward Surplus
Cleves	£97,000	£320,000
Monega	£61,000	£389,000
New City	£285,000	£492,000
Ravenscroft	£95,000	£790,000
Rosetta	£640,000	£1,787,000
Shaftesbury	£300,000	£618,000
Tollgate	£82,000	£126,000
Teaching School	£47,000	£47,000
SCITT	£8,000	£8,000
HQ	£47,000	£261,000

In total the trust will carry forward a sum of £4,822m.

With capital reserves the school received two lots of SCA funding and the executive has approved £875k on capital works, carrying over a balance of £340k unallocated capital works.

RN presented the budget. This has been very challenging due to Covid. All schools have been given an extension for the budget submission by the ESFA until the end of September. The budget will be in two phases. A flash budget and a revised final budget following Government announcement in August / September.

RN presented a 5-year budget to show the viability of the schools. Next year's figures show a slight drop in funding and an increase in staffing costs though this is being addressed by the executive. Value for money will continue to be core to spending which will reduce other spending. The trust will always be viable as the trust is strong with very strong financial management.

Total expenditure will go up by 1% taking budgeted surplus from 5% to 4% next year and a surplus of £1.2m retained earnings carried forward.

In terms of the capital budget, it's in two parts. The trust to date has received £1.216m in SCA funding and allocated £875k to capital work, as outlined in the document shared with trustees previously.

The remaining £340k can be allocated throughout the academic year.

Overall the trust allocated £2.8m to capital and secured £2.47m for specific projects with £340k available for other work.

RN gave an executive summary of each school's budget at the end of 2021.

Setting	In-Year Surplus
Cleves	£44,000
Monega	£38,000
New City	£109,000
Ravenscroft	£485,000
Rosetta	£65,000
Shaftesbury	£360,000
Tollgate	£40,000
Teaching School	£27,000
SCITT	£15,000
HQ	£51,000

CAD and TC thanked RN for all that she has done for the trust.

CAD asked if any of the surplus was being given back to the heads again. TC said no as it was apparent that this wasn't good last year as it compromised the level of support the Trust could offer the schools.

5.3 Financial Services and Internal Audit Tender

SGL asked RN to excuse herself, so that the outcome of the tender could be discussed.

SGL and TC explained the tender process and why the Audit Committee decided to retain RN and Academies Finance for another 3 years with the option of an additional two years if both parties agree.

Both CAD as Chair of the Trust and AA as Chair of the Audit Committee both shared their thoughts and their agreement with the above recommendation.

RN will be known as the Finance Specialist going forward with SGL retaining the job title of Chief Finance and Operating Officer and continues to be the named CFO of The Boleyn Trust.

SGL said that he would be informing all organisations who tendered the decision after this meeting.

SGL requested delegated authority for himself as CFOO and TC as CEO to sign off the Service Level Agreement with Academies Finance at the appropriate time.

Trustees **AGREED** to delegated authority being passed to the CFOO and CEO for the above purpose.

6. STANDING ITEMS

6.1 No Item to report.

7. ANY OTHER URGENT BUSINESS

7.1 No urgent business was tabled or discussed.

8. DATE, TIME AND VENUE OF NEXT MEETING

8.1 The date of the next meeting will be **Thursday, 17 September 2020** at **16:00pm** via **Zoom**.

8.2 There being no further business, the Chair thanked everyone for attending and the meeting closed at 15:12pm



BEHAVIOUR AND DISCIPLINE STATEMENT

Introduction

This statement of principles establishes the Trust's expectations and approach to ensuring a positive and enabling approach to the management of behaviour and discipline across all schools within the Boleyn Trust. The purpose of this statement is to establish general principles to inform policy and practice relating to pupil behaviour and discipline. It is relevant for Headteachers, Local Governing Bodies, staff and parents and will inform consistent day to day working practices that ensure positive, safe and respectful learning environments across the Trust.

The Boleyn Trust aims to provide a supportive learning environment which recognises every student's rights and responsibilities. We aim to treat everyone we have responsibility for with respect and dignity, and to provide a positive learning and working environment free from discrimination, harassment or victimisation.

Statement of Principles: Positive Behaviour

The Trust's approach to promoting positive behaviour in pupils requires school policy and procedures to promote the following 5 characteristics of positive behaviour in students:

- Commitment
- Care
- Consideration
- Courtesy
- Co-operation

These characteristics help students become more successful in their learning, increasing their chances of achieving their potential.

Statement of Principles: Restorative Discipline

The Trust embraces a restorative approach to maintaining discipline within its schools and requires school policy and procedures to promote best restorative practices (including mediation) as approved by the Anti-bullying and Youth Justice Board, the Ministry of Justice and the Department for Education. Restorative practices will hold offenders to account for what they have done, help them to understand the real effect of what they have done, and make them take responsibility or make amends

School Behaviour Policies

Each school will have a behaviour policy. The Board of Trustees and Local Governing Body will set the general principles that inform the behaviour policy in consultation with the Headteacher, school staff, parents and pupils. Behaviour policies will include measures to prevent all forms of bullying among pupils. Head teachers will publicise the school behaviour policy, in writing, to staff, parents and pupils at least once a year.

Headteachers will develop each school's behaviour policy and procedure in the context of this

statement of principles. They will set standards of behaviour in accordance with Trust expectations and set out how those standards will be achieved, including:

- school rules
- disciplinary penalties for breaking the rules
- rewards for good behaviour

Powers to discipline

Teachers, teaching assistants and other paid staff with responsibility for pupils have the power to discipline pupils whose behaviour is unacceptable, who break the school rules or who fail to follow a reasonable instruction. Their power to discipline applies to pupil behaviour in school and outside school, in certain circumstances, for example, on school trips.

Punishment

Teachers, teaching assistants and other paid staff with responsibility for pupils can impose any reasonable disciplinary penalty in response to poor behaviour. Reasonable penalties can include: confiscation, retention or disposal of a pupil's property; and detention. Headteachers, in discussions with the Chief Executive Officer will decide whether to exclude a pupil for a fixed period (to suspend) or to permanently exclude them.

Searching pupils

School staff can search pupils with their consent for any item. Headteachers and staff authorised by the Headteacher have the power to search pupils or their possessions, without consent, where they suspect the pupil has a "prohibited item". Prohibited items are:

- knives and weapons
- alcohol
- illegal drugs
- stolen items
- tobacco and cigarette papers
- fireworks
- pornographic images
- any article that has been or is likely to be used to commit an offence, cause personal injury or damage to property
- any item banned by the school rules which has been identified in the rules as an item which may be searched for.

Use of powers to search will be in accordance with the following guidelines:

<http://www.education.gov.uk/schools/pupilsupport/behaviour/behaviourpolicies/f0076897/screening-searching-and-confiscation>

Allegations of abuse against staff

Allegations of abuse will be taken seriously, and Trust schools will ensure they deal with allegations quickly in a fair and consistent way that provides effective protection for the child and supports the person who is the subject of the allegation. Every effort will be made to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated. Suspension will not be used as an automatic response when an allegation has been reported. The school's behaviour policy will set out the disciplinary action that will be taken against pupils who are found to have made malicious accusations against school staff.

The management of allegations of abuse against staff will be in accordance with Department for Education guidance 'Keeping Children Safe in Education'. The latest version can be found at:

<https://www.gov.uk/government/collections/statutory-guidance-schools>

Exclusion

The Headteacher, supported by the Chief Executive Officer, will decide whether to exclude a pupil, for a fixed term or permanently, in line with the legal requirements on the use of exclusion and having regard to statutory guidance.

The management of exclusions will be in accordance with the following guidelines:

<https://www.gov.uk/government/publications/school-exclusion>.

Parents have the right to make representations to the governing body (or discipline committee) about an exclusion and the governing body will review the exclusion decision in certain circumstances, which includes all permanent exclusions. Where a local governing body upholds a permanent exclusion, parents have the right to request that an independent review panel reviews this decision. The independent panel will include a representative from the Trust's Board of Trustees. Parents may also make a claim of discrimination in respect of an exclusion, either to the First-tier Tribunal in relation to disability discrimination or the County Court in relation to other forms of discrimination.

Boleyn Trust schools will comply with their duty to arrange suitable full-time education for an excluded pupil from the sixth school day of any fixed period exclusion of more than five school days. Local authorities are under a duty to arrange suitable full-time education from the sixth school day of a permanent exclusion.

Parents

Boleyn Trust schools will ask parents to sign, a Home School Agreement that outlines the responsibilities of the parent and the school; including those around behaviour and attendance. Parents are under a legal duty to ensure that their child (aged 5-16) receives a suitable full-time education either at a school or by making other suitable arrangements. Parents are expected to work in partnership with school staff in making sure their child is well behaved at school.

This statement was ratified by the Board of Trustees on 17 September 2020.

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Chair of the Board of Trustees



SAFEGUARDING AND CHILD PROTECTION STATEMENT

We maintain an attitude of 'it could happen here'

Safeguarding determines the actions we take to keep children safe and protect them from harm in all aspects of their school life. As a multi academy trust (MAT) we are committed to safeguarding and promoting the welfare of all our pupils. The actions that we take to prevent harm, to promote well-being, to create safe environments, to respond to specific issues and vulnerabilities all form part of the safeguarding responsibilities of the MAT.

We recognise our moral and statutory responsibility and make every effort to provide a safe environment underpinned by a culture of openness where both children and adults feel secure, able to talk, and believe that they are being listened to.

Safeguarding and Child Protection policies available on individual school websites, have been developed to ensure compliance with Section 175 of The Education Act 2002, Section 11 of the Children's Act 2004, Working Together to Safeguard Children 2015 and Keeping Children Safe in Education 2020. All schools follow the Local Safeguarding Children Board's interagency policies and procedures.

Each school's local governing body is responsible for the implementation of the Safeguarding and Child Protection Policy for the school. This is on the agenda and monitored at every full local governing body meeting. Each local governing body has a designated Safeguarding governor who reports and provides feedback at every full board meeting. The designated Safeguarding governor meets regularly with the school's Designated Safeguarding Lead (DSL) to ensure compliance. This involves completing an annual Safeguarding audit and the 360 degree 'e safety' self-review. The DSL for the school provides the local governing body with an annual written report. The DSL must complete the annual Safeguarding Training and Induction return for the Local Safeguarding Children Board. This ensures that all staff are fully trained and up to date with policies and procedures.

All schools must have in place robust reporting systems to document any safeguarding and child protection issues to build a chronology of events. This enables them to identify and address individual and whole school concerns and patterns. The use of a robust reporting system allows schools to share information and work more effectively with other agencies. Schools will robustly follow the policy if they have concerns about the management of a case by Children and Social Care.

This policy works in conjunction with other relevant policies all which safeguard the interests and welfare of children e.g. safer recruitment, anti-bullying, whistle blowing, health and safety, special education needs and disabilities and the single equality scheme. Policies are reviewed annually or updated if national guidance requires it during the year.

This statement was approved by the Board of Trustees on 17 September 2020.

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CLIVE-ANTHONY DOUGLAS
FOR AND ON BEHALF OF THE BOARD OF TRUSTEES

Attendance Policy

1. Rationale

Boleyn Trust Schools convey the importance for excellent attendance and punctuality to parents, pupils and teachers. Children quickly pick up the message that their education is important, and that their presence is essential. As part of the United Nations Convention on the Rights of the Child (UNCRC), it clearly states that every child has a right to an education. The twice-daily requirement to register pupils can and should be perceived as an opportunity for the School to receive children formally from home and serve as an introduction to the session.

At the Boleyn Trust we recognise that statistically pupils whose attendance falls below 97% achieve significantly less well than their peers and for that reason emphasise the need for pupil attendance to be maximised. Children are expected to attend for the full time of the academic year, unless there is a good reason for absence. There are two types of absence:

- Authorised (where the School approves pupil absence e.g. absence due to sickness, religious observance, funerals);
- Unauthorised (where the School will not approve absence e.g. holidays during term time, taking children out of school without permission i.e. birthdays, parents or siblings attending medical appointments).

In line with our Safeguarding practices, our schools have a first day of absence calling policy to ensure we know our pupils' whereabouts.

This policy applies to all pupils across the Trust, including children of non-statutory school age.

2. Policy Statement

If a child is absent, parents should call the School office by 9.30am on the first day of absence stating a reason. Parents must contact the School daily to update on the medical condition and the anticipated length of time of any continued absence. On the child's return to school, a note explaining the reason for the absence and/or medical evidence must be provided.

Pupil absence rates are carefully monitored. The School is keen to work with parents to increase the amount of time a child spends in school. In such cases, the Attendance Officer and/or the Education Welfare Officer (EWO) will invite parents in to discuss the reasons for the absences and consider possible solutions. Where there is little or no improvement, a penalty notice may be issued and/or court proceedings instigated.

Leave of absence during Term Time

A pupil's absence during term time can seriously disrupt their continuity of learning. Not only do they miss the teaching provided on the days they are absent, they are also less prepared for the lessons building on that after their return. There is a consequent risk of underachievement, which the School and parents must seek to avoid.

Under guidance given by the Department of Education, schools are not able to authorise family holidays during term time. School term dates are published a year in advance;

therefore, the School does not see any reason for parents to take their child(ren) out of the School during term time.

Parents wishing to request leave of absence must:

- Request a copy of the Boleyn Trust Attendance Policy and Request for Leave of Absence Form (**Annex 2**) from the School Office;
- Complete a Request for Leave of Absence Form.

Applications must be made in advance and the Headteacher must be satisfied that there are exceptional circumstances based on the individual facts and circumstances of the case.

In considering whether or not to authorise leave of absence, the School will consider each case individually. Parents will be notified in writing of the School's decision on exceptional leave.

Parents who take their child(ren) on a leave of absence without the School's permission could be issued with a Penalty Notice (a fine of up to £60). In cases where there is more than one pupil in the family, a Penalty Notice will be issued for each parent of each child.

Where leave of absence has been granted, the Headteacher will determine the number of days a pupil can be away from school. A leave of absence is granted entirely at the Headteacher's discretion. The regulations do not allow schools to give retrospective approval. If the leave of absence is not applied for in advance, the absence will be recorded as unauthorised.

Religious Observance

Boleyn Trust Schools will treat absence as authorised when it is due to religious observance. Following DfE guidance, the day must be exclusively set apart for religious observance by the religious body to which the parents belong. Where necessary, School staff will seek advice from the parents' religious body about whether it has set the day apart for religious observance. The School will expect to be notified by parents in advance if their child(ren) will be absent for religious observance.

Interviews at other educational institutions

Following DfE guidance, Schools should be satisfied that the interview and/or test is linked to transfer to another educational institution. Absence should be limited to the time taken to complete the test and travel to and from the educational institution. Parents/carers will be asked to provide evidence of appointments in advance.

Lateness

Pupils who are consistently late disrupt not only their own education but also that of others. Please refer to your child(ren)'s School website for specific timings of the School day.

In cases of persistent lateness, the parent/carer(s) will be invited to meet with a member of the Senior Leadership Team, Attendance Officer or EWO to seek a resolution.

Absence for Medical Reasons

Parents must make every effort to arrange medical appointments outside school hours. If it is necessary for a child to be out of school for this reason, the child should be returned to school directly after the appointment. The Attendance Officer may request medical evidence for longer periods of absence and for children who are absent for a week or longer.

Rewards

Children will be rewarded for consistently excellent attendance and most improved attendance. Rewards are given out in assemblies and the children are encouraged to achieve consistently good attendance.

What can parents do to help?

- Follow the Attendance policy guidelines for reporting absence.
- Send a note when your child returns to school after absence.
- Make non-emergency appointments outside school time.

If you are worried about your child's attendance at school what can you do?

- Talk to your child about concerns they may have about school; it may be something simple.
- Talk to the Attendance Officer, Class teacher or a member of the Senior Leadership Team at the Academy.
- You may contact the EWO, who will work with you and the Academy to resolve the situation (number available from the Academy Office).

3. Policy Status and Review

The Board of Trustees has agreed to this Policy and, as such, it applies to all Schools within the Trust. Please note that should any further national guidance be issued by external agencies that are relevant to this policy, it will be updated accordingly prior to the review date shown below and re-circulated.

Date approved: September 2020

Review date: August 2024

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Chair of the Board of Trustees

Admissions Policy

1. Rationale

The Boleyn Trust comprises seven primary schools. The numbers and criteria for admission are detailed below. Into Reception the following numbers are admitted each September:

Setting	Local Authority	Numbers admitted
Cleves Primary School	London Borough of Newham	60
Monega Primary School	London Borough of Newham	90
New City Primary School	London Borough of Newham	90
Ravenscroft Primary School	London Borough of Newham	90
Rosetta Primary School	London Borough of Newham	90
Shaftesbury Primary School	London Borough of Newham	90
Tollgate Primary School	London Borough of Newham	60

2. Policy Statement

For schools within the London Borough of Newham, the Boleyn Trust follows the Newham Local Authority Admissions policy and procedures. Full details can be found here:

<https://www.newham.gov.uk/schools-education/primary-school-admissions/1>

3. Policy Status and Review

The Board of Trustees has agreed to this Policy and, as such, it applies to all Schools within the Trust. Please note that should any further national guidance be issued by external agencies that are relevant to this policy, it will be updated accordingly prior to the review date shown below and re-circulated.

Date approved: **September 2020**

Review date: **August 2024**

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Chair of the Board of Trustees

Whistleblowing Policy

1. Rationale

The Trust is committed to achieving the highest possible standards of service and ethical standards and this policy will enable you to raise your concerns of serious wrongdoing without fear of reprisal.

This policy applies to all individuals working for the Trust at all levels and grades, whether they are employees, contractors, and casual or agency staff.

Whistleblowing is distinct from the Complaints procedure which should be used if you have a complaint relating to your personal circumstances in the workplace. Concerns about wrongdoing within the Trust such as fraud, malpractice, mismanagement, breach of health and safety law or any other illegal or unethical act either on the part of management, the Local Governing Body or by fellow employees should be raised using this procedure.

This policy has been introduced in line with the Public Interest Disclosure Act 1998 (which you can consult at <http://www.opsi.gov.uk/acts/acts1998>) to enable workers to raise issues of concern in an appropriate manner.

2. Policy Statement

This policy aims to:

- Encourage workers to feel confident in raising concerns
- Establish a fair and impartial investigative procedure
- Provide avenues for workers to raise concerns and receive appropriate feedback
- Ensure that workers receive a response to concerns and are aware of how to pursue them if they are not satisfied
- Ensure that workers will be protected from any reprisals or victimisation by the school, provided that there is reasonable belief that the matter disclosed tends to show wrongdoing and that the disclosure has been made in an appropriate manner.

Scope

This policy may be used by all workers at a school to raise concerns where the wellbeing of others or the school itself is at risk.

The term worker broadly includes employees, contractors, agency workers, trainees and a person who is or was subject to a contract to undertake work or services for the school.

Responsibilities

The Trust is responsible for maintaining fair, consistent and objective procedures for matters relating to whistleblowing.

The Headteacher has overall responsibility for the internal organisation, control and management of each school.

Timing

The whistleblowing procedure should normally be conducted within the timescales laid down in this document. However, if there is a valid reason to do so, timescales can be varied. If this is initiated by management, the employee should be given an explanation if this occurs and informed when a response or meeting can be expected. Delays should not normally exceed 10 working days.

What to raise concerns about

The Public Interest Disclosure Act lists matters about which concerns can be raised, provided they are in the public interest, which are as follows

- a. That a crime has been committed, is being committed, or is likely to be committed
- b. That a person has failed, is failing, or is likely to fail to comply with any legal obligation to which they are subject,
- c. That a miscarriage of justice has occurred, is occurring, or is likely to occur
- d. That the health and safety of an individual has been, is being, or is likely to be endangered
- e. That the environment has been, is being or likely to be damaged
- f. That information tending to show any of a) to e) above has been concealed or is likely to be deliberately concealed.

Particular concerns that may fall within the terms of this policy include, for example, breach of a code of conduct, wilful maladministration and corruption, misuse of funds, theft or fraud. We anticipate that disclosure will most likely relate to the actions of employees, contractors, and casual or agency staff, but they may also relate to the actions of a third party.

Boleyn Trust assurances to workers

To ensure workers have the right to disclose a concern

Workers have the right to disclose a concern/issue if the school does not deal with the matter. However, the duty of fidelity is implied by the law in every contract of employment and prohibits employees from disclosing employers' confidential information, unless it is in the public interest that information is disclosed or unless the School fails to properly consider or deal with the issue.

To protect workers

If a worker makes a disclosure on one or more of the matters listed above and they have a reasonable belief that the concern is real, the worker will not suffer any detriment, even if after investigation it transpires that the concern is unfounded, unless the concern has been raised falsely or maliciously. The Trust will not tolerate the harassment or victimisation of any worker raising a genuine concern, this may include disciplinary action.

If a worker requests that their identity is protected, the school will not disclose it unless required to do so in law. If the situation arises where the school is unable to resolve the concern without revealing the worker's identity (for instance because the worker's evidence is needed in court), the school will discuss with the worker how the matter should proceed. However, it must also be stated that if a worker chooses not to disclose their identity it will

be much more difficult for the Trust to look into the matter or to protect their position or to give them feedback. Accordingly, while the Trust will consider anonymous reports, it will not be possible to apply all aspects of this policy for concerns raised anonymously.

Internal procedure

Stage one - notification

The worker (the Representer) raising the concern should do so orally or in writing to their line manager or to the Headteacher. The Representer has the right to have the matter treated confidentially.

If the line manager or the Headteacher believes the concern to be genuine and that it is appropriate to use the Whistleblowing procedure, the manager should contact the Chair of the Local Governing Body. The Chair of the Local Governing Body will either act as Assessor or will appoint another Assessor who is not implicated (which could be the Headteacher).

The Chair of the Local Governing Body will notify the Chair of the Board of Trustees that a concern has been raised and the nature of the concern but will not divulge the personal details of the representer.

Should it be alleged that the Chair of the Local Governing Body is involved in the alleged malpractice; the Chair of the Board of Trustees should be contacted in place of the Chair of the Local Governing Body.

If the Representer feels unable to raise their concern with their line manager or the Headteacher in the first instance, they may contact the Chair of the Local Governing Body directly. If this occurs, the Representer will be asked to explain why they feel unable to raise the concern with their line manager or the Principal.

Stage two – the meeting

The Assessor will interview the Representer within ten working days, in confidence, or earlier if there is an immediate danger to loss of life or serious injury and will:

Obtain as much information as possible from the Representer about the grounds for the belief of malpractice;

- Consult with the Representer about further steps which could be taken;
- Inform the Representer of appropriate routes if the matter does not fall within the Whistleblowing Procedure;
- Report all matters raised under this procedure to the Trusts Chief Executive Officer.

At the interview with the Assessor, the Representer may be accompanied by a recognised trade union representative or a work colleague. The Assessor may be accompanied by a note taker.

The Assessor will update the Chair of the Local Governing Body (if they are not acting as the assessor) and the Chair of the Board of Trustees following the meeting but will not divulge the personal details of the representer.

Stage three – the outcome

Within ten working days of the interview, the Assessor will recommend to the Headteacher, or the person's line manager, one or more of the following:

- The matter be investigated internally by the Trust
- The matter be investigated by an external person appointed by the Trust
- The matter be reported to the Department for Education
- The matter be reported to the Police.
- No further action be taken.

The grounds on which no further action is taken may include:

- The Assessor is satisfied that, on the balance of probabilities, there is no evidence that malpractice has occurred, is occurring or is likely to occur;
- The matter is already (or has been) the subject of proceedings under one of the school's other procedures or policies;
- The matter concerned is already the subject of legal proceedings, or has already been referred to the police, an external investigator, the Department for Education or another public authority.

If no further action is to be taken, then this will be reported to the Chief Executive Officer.

Should it be alleged that the Headteacher or Line Manager is involved in the alleged malpractice, the Assessor's recommendation will be made to the Chief Executive Officer.

The recipient of the recommendation (Headteacher or Chief Executive Officer) will ensure that it is implemented unless there is good reason for not doing so in whole or in part. Such a reason will be reported to the next meeting of the Local Governing Body / Board of Trustees and to the Assessor.

The conclusion of any agreed investigation will be reported by the Assessor to the Representer in writing within ten days and a copy passed to the Chair of the Local Governing Body if they are not acting as Assessor. A copy will also be sent to the Chair of the Board of Trustees.

If the Representer has not had a response within the above time limits, he or she may appeal to the Chief Executive Officer but will inform the Assessor before doing so.

The Representer may at any time disclose the matter on a confidential basis to a solicitor or trade union representative for the purpose of taking legal advice.

External contacts

Whistleblowing to an external body without first going through the internal procedure is inadvisable without compelling reasons. A reason may be that the Representer is not content with the conclusion of the Assessor. In particular, this means being careful about what is said to the media. Compelling reasons could be the involvement of the senior managers, serious health and safety issues or possible discrimination. The external bodies which could be used include:

- The Department for Education

- Member of Parliament
- National Audit Office
- Health and Safety Executive
- Police.

If you do not feel able to raise your concern in the ways outlined above, you should consult the Public Interest Disclosure Act for information about other routes by which a disclosure may be made.

Malicious Accusations

Deliberately false or malicious accusations made by a Representer will be dealt with under the Schools disciplinary procedure.

The school will ensure the Representer is protected from any form of victimisation or discrimination.

3. Policy Status and Review

The Board of Trustees has agreed to this Policy and, as such, it applies to all Schools within the Trust. Please note that should any further national guidance be issued by external agencies that are relevant to this policy, it will be updated accordingly prior to the review date shown below and re-circulated.

Date approved: **September 2020**
 Review date: **August 2024**

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Chair of the Board of Trustees

Staff Expenses Policy

1. Rationale

At the Boleyn Trust, staff may claim reimbursement for reasonable expenses incurred wholly, necessarily and exclusively in the course of the business of the school or the Trust. These may arise from attending meetings, training or conferences, or purchases made on the school or Trust's behalf. Any purchase made must be approved by the budget holder prior to purchase. It is essential that Inland Revenue regulations are met and therefore this policy must be adhered to when making an expense claim.

2. Policy Statement

Claiming Expenses

Payments for the personal expenditure of staff must be made using HCSS.

The purchase of classroom equipment and items should normally be completed using the purchase ordering system and paid for directly by the school.

Staff should make reasonable efforts to get the best value possible when purchasing items, food or travel tickets.

Supporting documents required as evidence, such as receipts and bills, must be attached to the expense claim on HCSS.

Claims must be approved and signed by the budget holder in accordance with the Scheme of Financial Delegation.

Claims by the Headteacher must be authorised by the Chair of Governors.

Claims by the Executive Team must be authorised by the Accounting Officer.

Claims by the Accounting Officer must be authorised by the Chief Finance and Operating Officer and reported to the Trustees termly.

Claims which do not meet approval will not be processed and will be returned.

A copy of a completed claim will be recorded and stored on HCSS. The original, with any supporting documents, will be sent to the central finance team/ payroll provider for payment.

The submission of false claims will be treated as fraud and will lead to disciplinary action.

Tax considerations

Claims adhering to the procedures in this Policy will be paid without the deduction of income tax. However, it is the claimant's responsibility to ensure payment for any due tax is made.

Other expenses will be paid via payroll. These will be treated as benefits-in-kind and taxed accordingly.

Travel Expenses

Payment for mileage will be paid at the rate in the LA in which the school is situated.

Staff are encouraged to car pool where possible and sharing is expected where staff start from and return to the same location after making the same visit.

Mileage claims must have attached a VAT receipt for fuel used. The claimant is responsible for attaching the receipt and the person authorising the claim is responsible for checking the receipt is valid prior to payment.

An appropriate receipt must:

- Be dated before the date of the journey claimed for.
- Show the amount of fuel purchased in litres.
- Show the name of the fuel supplier and their VAT registration number.
- Account for at least 25% of the total amount of the mileage claim.

If several low mileage claims are submitted, a single receipt showing fuel purchased to cover all the miles claimed is sufficient.

The date of, reason for, starting point and destination of the journey should all be shown on the Staff Expenses Claim Form.

Claims should be submitted monthly. Claims submitted over 6 months after the expense was incurred will not be paid.

Parking or speeding fines will never be reimbursed. Toll road charges may be reimbursed if the budget holder's permission has been granted before the journey is made.

Business mileage will never be paid for a journey from home to a normal place of work.

If a journey starts at home or finishes at home, the mileage claimed should be the lesser of the distance travelled compared to normal home to work mileage.

Vehicle Insurance

The Trust does not provide car insurance for staff using their own vehicles, although individual schools may take out this cover. Staff members are responsible for ensuring they are appropriately insured prior to travel.

Staff must also ensure that the car is safe and legal to drive.

Travel by Rail, Bus or Aeroplane

The use of public transport for eligible journeys will be reimbursed upon receipt, provided the expenses are reasonable. Staff should ensure they travel by the most economical method bearing in mind both the cost and travel time. Any overseas travel should be approved by the Accounting Officer before booking to confirm that it is in the interests of the Trust. Accompanying overseas school trips for pupils will fall into that category.

Staff should use the most economical class of travel. Generally, this is standard or economy class unless the cost of first class is at the same cost. If a member of staff wishes to travel first class, they may do so on reimbursement to the Trust of the difference in the fare.

The school will not pay for the travel of any accompanying person, unless their attendance is required as a representative of the school or the staff member requires assistance by means of reasonable adjustments.

Cost of Meals and Accommodation

The cost of meals purchased by staff required to work at a location away from their home or the normal place of work may be claimed.

No reimbursement will be made for an activity or visit where the staff member normally would have provided their own lunch e.g. school trips. However, the cost of meals will be paid when on a course or otherwise away overnight.

Reasonable expenses for the cost of accommodation, food and drink will be reimbursed when supported by receipts.

Only the cost of accommodation required for business purposes will be reimbursed by the school or Trust. It will not meet the cost of additional parties or accommodation provided to a spouse or other family members.

Personal items, such as alcoholic drinks, mini-bars, newspapers, movies etc. will not be reimbursed and their total should be deducted from any bills submitted for expenses purposes.

If an employee chooses to stay with friends or relatives instead of in a hotel, an allowance of £30 per night may be claimed.

Telephone and Mobile Expenses

Business calls made from a home telephone or personal mobile phone may be reimbursed subject to provision of an itemised telephone bill and their inclusion on the Staff Expenses Claim Form. Line or equipment rental will not be reimbursed.

The School provides mobile phones for operational purposes and to some senior staff. Such phones can be used for personal use (for example to let someone know you will be late home) on occasion bills will be monitored and any excessive personal use will need to be reimbursed.

Cleaning of Uniforms/ equipment

A limited number of staff are provided with branded uniforms or other equipment as part of their role in the Trust. The uniforms should be maintained by the staff member, so they are clean and tidy in use. No expenses can be claimed for cleaning unless the cost is exceptional (and more than would be expected for other work attire).

Overseas Travel

When travelling overseas the same general principles for staff expenses as above apply. Travel arrangements should be made through an ABTA registered agent. Insurance provision should be investigated before the trip and if necessary additional cover purchased.

It is recognised that on some occasions, when not accompanying children, a member of staff may wish to extend their stay into the weekend or school holidays for personal reasons. This is permitted if any additional expenditure (flight cost, hotel room, subsistence) is paid for by the member of staff.

3. Policy Status and Review

The Board of Trustees has agreed to this Policy and, as such, it applies to all Schools within the Trust. Please note that should any further national guidance be issued by external agencies that are relevant to this policy, it will be updated accordingly prior to the review date shown below and re-circulated.

Date approved: September 2020

Review date: August 2024

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Chair of the Board of Trustees

Travel to Work Policy

1. Rationale

The purpose of this policy is to explain the circumstances in which the Trust will make an interest-free loan to an employee, the procedure for making the loan, and the conditions that will apply to the loan.

The terms of the policy may be varied from time to time at the Trust's discretion. The trust may terminate the policy without notice at any time or exclude employees from participating in the policy at its discretion.

The policy does not form part of employees' contracts of employment.

The Trust makes loans to employees for the following purposes:

- Season Ticket Loan
- London Borough of Newham Parking Permit

2. Policy Statement

Season ticket loan

The Trust will provide a loan to an employee for the purpose of purchasing an annual season ticket to facilitate travel between work and home by public transport. The loan will not cover other travel costs, for example costs associated with the use of a car for getting to and from a train station, such as parking costs.

Eligibility

An employee is entitled to apply for a loan unless he/she:

- has not yet passed his/her probation period;
- does not have sufficient monthly salary to make the necessary repayments;
- has served notice of resignation;
- has received notice from the Trust terminating his/her employment;
- is subject to disciplinary proceedings that could result in his/her dismissal;
- is subject to an active final written warning; or
- is repaying a previous loan from the Trust.

In deciding whether or not to provide a loan, the Trust may take into account:

- the employee's ability to repay the loan, taking into account his/her salary and other loan or financial commitments;
- the employee's personal circumstances; and
- extenuating circumstances.

Trust's discretion

The Trust will decide at its absolute discretion whether or not to grant a loan to an employee at his/her request, and whether or not the full amount of the loan requested will be provided.

The Trust reserves the right to deny a loan application on whatever grounds it deems appropriate.

Repayment period

The loan repayment period will be agreed between the Trust and the employee and will depend on the type and amount of the loan. The usual length of a loan repayment period is [12] months.

Once the loan is made, the Trust will make deductions in equal [monthly] instalments from the employee's salary for the purposes of repayment of the loan. The first deduction will be made from the employee's salary in the month following the month in which the loan is made. Deductions from the employee's salary for the purpose of repaying the loan will be itemised on the employee's payslip.

Termination of employment

In the event of the termination of employment for any reason, the employee will be required to reimburse the Trust for the outstanding amount of the loan. A deduction equivalent to the outstanding amount on the loan will be made from any final payments due to the employee. Pay for these purposes includes (but is not limited to) salary, holiday pay, expenses and bonus payments.

In the event that the employee's final pay is insufficient to allow for the whole of any such deduction, or the Trust agrees, on the employee's request, to further time for repayment of the outstanding amount, the employee will be required to make a separate payment to the Trust, to be paid to the Trust within one month of the termination of his/her employment. If relevant, the HR department will set out a schedule for repayment of the outstanding amount.

If the employee does not repay the loan in accordance with this policy, the Trust may take legal action to recover the amount outstanding.

Procedure

To apply for a loan, an employee must complete a loan application form, which is available in **Appendix 1**.

The employee should return the completed form to the Headteacher. The Trust will take up to five working days to consider the application. If the application is approved, the Headteacher will contact the employee and request that he/she enters into a written agreement with the Trust for repayment of the loan.

On receipt of the signed written agreement for repayment of the loan, the Trust will initiate a transfer direct into the employee's bank or building society account within three working days.

Disciplinary action

It is a disciplinary offence for an employee to abuse this policy. If an employee is found to have abused the policy, he/she will be subject to disciplinary proceedings, which could lead to dismissal.

3. Policy Status and Review

The Board of Trustees has agreed to this Policy and, as such, it applies to all Schools within the Trust. Please note that should any further national guidance be issued by external agencies that are relevant to this policy, it will be updated accordingly prior to the review date shown below and re-circulated.

Date approved: September 2020

Review date: August 2024

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Chair of the Board of Trustees

Annex 1: Loan Request Form

I would like to apply for a:

- Season ticket loan ☐
- London Borough of Newham Parking Permit ☐

Employee's name:

Setting:

Job title:

Date of commencement of employment:

Amount of loan required:

Date loan required*:

*Please note that the Trust may not be able to provide the loan by the date required if you have not given sufficient notice in accordance with the loans policy.

Please provide the bank account details below where you would like the funds deposited. This must be the same bank account which we pay your salary into.

Account Name:

Account Number:

Account Sort Code:

Bank or Building Society Name:

Please tick "yes" or "no" for each question:

Have you passed your probation period? ☐ Yes ☐ No

Do you have sufficient monthly salary to make loan repayments? ☐ Yes ☐ No

Have you served notice terminating your employment or received notice from the Trust terminating your employment? ☐ Yes ☐ No

Are you subject to disciplinary proceedings? ☐ Yes ☐ No

Are you subject to an active final written warning? ☐ Yes ☐ No

Are you in receipt of a loan from the Trust that you are currently repaying? ☐ Yes ☐ No

Have you made a previous application for a loan from the Trust? ☐ Yes ☐ No

If yes, on what date did you make the application?

The information in this application form is true to the best of my knowledge and belief.

Employee's signature: Date:

Authorisation:

The Headteacher or in the case of an employee from HQ the CEO should sign the form once he/she has checked the accuracy of the information provided by the employee.

signature: Date:

Once authorised, this should be scanned over to the Chief Finance and Operating Officer at Head Officer to be processed.

Annex 2

[Recipient's name]
[Recipient's address]
[Recipient's town]
[Recipient's postcode]

Dear []

This letter sets out the terms on which the Trust is prepared to advance you a loan of £[amount] in accordance with your request dated [date] for the purpose of [purchasing a season ticket/London Borough of Newham Parking Permit].

The loan will be free of interest and repayable on a [monthly] basis, commencing on [date] at the rate of £[amount] per [month] by way of deduction from your salary.

In the event that you leave the Trust's employment for whatever reason before the loan has been repaid in full, you will be required to reimburse the Trust for the outstanding amount of the loan. You agree that any outstanding monies due to the Trust in respect of this loan may be deducted from any sums due to you from the Trust, including (but not limited to) your [final salary/outstanding expenses/bonus/holiday pay].

If there is still an amount outstanding after making such deductions, or the Trust agrees, on your request, to further time for repayment of the outstanding amount, you agree to make a separate payment to the Trust within one month of the termination of your employment. If relevant, the HR department will set out a schedule for repayment of the outstanding amount.

The loan may constitute a taxable benefit, in which case you will be responsible for the payment of all tax due.

Please sign and date the attached copy of this letter in acknowledgment of your agreement to the above terms.

Yours sincerely,

STEVEN LOCK
Chief Finance and Operating Officer

To Boleyn Trust

I hereby agree to the terms set out in the above copy letter.

Signed:

Dated:

Trustee and Local Governor Expenses Policy

1. Rationale

The Boleyn Trust acknowledges the role of Trustees and Governors in setting the strategic direction and monitoring the performance of the Trust. Although the role is voluntary the Trust wishes to provide a facility for Trustees and Governors to be reimbursed for expenditure which they may incur in the course of their duties. This policy applies equally to all Trustees and Governors within the Boleyn Trust and details which expenses are payable for attendance at 'Approved Duties'. However, it is always open to any individual to choose whether or not to claim, irrespective of this policy.

2. Policy Statement

Claiming Expenses

The expenses which may be claimed are summarised below:

- Travel expenses;
- Subsistence expenses;
- Childcare and baby-sitting expenses;
- Governor assistance;
- Miscellaneous expenses.

All claims submitted for payment must be supported by a valid receipt.

Approved Duties

The following is a list of activities that the Boleyn Trust has deemed an "Approved Duty" for the purpose of claiming expenses under this policy:

- Properly convened meetings of the Trust, and Local Governing Boards;
- Other duties designated by the Trust or Local Governing Body, e.g. acting as a member of a panel convened for recruitment, disciplinary, pay or other approved reason;
- Attendance at a meeting or conference approved by the Trust and or Local Governing Body.

It should be noted that visits to the Trust schools by any Trustee or Governor will not qualify for payment under this policy.

Allowable Expenses

Trustees and Governors may only claim expenses in respect of actual expenditure incurred whilst attending the above meetings, undertaking training/development and otherwise acting on behalf of the Boleyn Trust. These expenses are not subject to tax as long as only actual expenditure is reimbursed and a valid receipt has been attached to the claim form.

Expenses that cannot be claimed by law

- 'attendance allowances' i.e. payment for actually attending meetings;
- loss of earnings.

Travel Expenses

Consideration should be given to the mode of transport to ensure that the most cost-effective means of travel is used. The costs of travel by car should be checked against other forms of public transport including rail travel prior to the journey being made.

All payments are on the basis that the journey was actually undertaken, and expenditure necessarily incurred. Trustees and Governors are encouraged to coordinate travel arrangements where possible to minimise the costs to the Trust. If Trustees and Governors share transport, only the driver is eligible to claim for the journey. The following may be claimed:

- the approved mileage rates currently in force as set out on HMRC website;
- the actual cost of standard rate public transport including bus and train fares (cheap rate fares should be used where they are available);
- the actual cost of car parking;
- toll road charges;
- taxi fares (in exceptional circumstances i.e. no other transport options available and attendance essential).

Mileage claimable must be calculated on the basis of the shortest, most practical route for the journey. Where it is reasonable and practical to use public transport then Trustees and Governors will be expected to do so.

Under no circumstances will the Boleyn Trust reimburse car parking fines, speeding tickets, damage to a vehicle whilst on official duties or the costs associated with any offences under the Road Traffic Acts.

Trustees and Governors should only travel by air if approved in advance by the Accounting Officer.

Cost of Meals and Accommodation

The cost of meals purchased by Trustees and Governors required to be at a location away from their home may be claimed. The cost of meals and accommodation will be paid when on a course or otherwise away overnight.

Reasonable expenses for the cost of accommodation, food and drink will be reimbursed when supported by receipts.

Only the cost of accommodation required for the purposes of the Boleyn Trust will be reimbursed by the school or Trust. The Boleyn Trust will not meet the cost of additional parties or accommodation provided to a spouse or other family members.

Personal items, such as mini-bars, newspapers, movies etc. will not be reimbursed and their total should be deducted from any bills submitted for expenses purposes.

Childcare and Baby-Sitting Allowances

Trustees and Governors may claim an allowance for childcare costs incurred on approved duties. This is not a round sum allowance, but must be for actual expenses incurred when it is

necessary for a non-family member to be paid to look after a child or children to allow a Trustee or Governor to attend approved duties

The allowance will be the actual expenses incurred. The Academy Trust will pay up to £50 per annum for this category of expense.

Assistance Allowances

Trustees and Governors may claim an allowance for costs relating to additional needs incurred on approved duties. These may include:

- Support for the cost of a signer;
- Audio equipment;
- Braille transcription;
- Translation of documents.

The Boleyn Trust will pay up to £50 per annum for this category of expense.

Miscellaneous Allowances

Trustees and Governors may claim reasonable expenses for the following costs incurred in carrying out their approved duties:

- Photocopying or printing;
- PC ink cartridges;
- Stationery including paper;
- Postage.

The Trust will pay up to £10 per annum of this category of expense. Often the school can print documents far cheaper than can be achieved on a home printer and therefore, if printed documents are required, these should be requested from the school in the first instance.

Payment of Expenses

Unless substantial sums are involved, claims should be submitted termly in arrears and claim forms must be submitted to the Chair of Trustees for Trustees or the Chair of the Local Governing Board in the case of Governors for review and approval. The Vice Chair in each case will authorise payments in respect of any claims made by the Chair. Payment will be made by the individual schools for Local Governors and the Chief Finance and Operating Officer for Trustees by BACS.

The Chair of Trustees or Local Governing Board, Headteacher, Chief Finance and Operating Officer or School Business Lead have the right to ask for additional evidence to support any expense claims made under this Policy. The School Business Lead will maintain a record of claims made including date, name, amount and reason for budget monitoring purposes. Trustees and Governors' expenses are subject to audit.

All claims must be supported by a valid receipt, e.g. bus ticket, phone bill, till receipt, child care receipt etc. All receipts which contain VAT must be retained by the Trust in accordance with current VAT legislation. In the case of telephone calls, an itemised phone bill must be provided where possible identifying the relevant calls where a claim is being made. Where an

itemised bill is not available full details of the calls must be provided. Claims outstanding for more than six months will not be accepted.

Publication of Expenses

The Boleyn Trust is obliged to publish details of all allowances and expenses paid to Trustees and governors on its public website and in its annual accounts.

3. Policy Status and Review

The Board of Trustees has agreed to this Policy and, as such, it applies to all Schools within the Trust. Please note that should any further national guidance be issued by external agencies that are relevant to this policy, it will be updated accordingly prior to the review date shown below and re-circulated.

Date approved: September 2020
Review date: August 2024

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Chair of the Board of Trustees

Local Governor Visits Policy

1. Rationale

The purpose of this policy is to provide a framework for Boleyn governors to make focused visits to their Schools so that they can build an effective working relationship with the staff and have a better understanding of the context in which they work.

2. Policy Statement

Aims of a Visit

- To gain a deeper understanding of the school to inform the Local Governing Board decision making process;
- To gain a deeper understanding of the responsibilities of a governor;
- To get to know the staff and develop a supportive relationship;
- To get to know the school within the remit of the Local Governing Board and to get to know the children;
- To focus on their area of responsibility or on an agreed aspect of the school improvement plan;
- To monitor the performance of the school and triangulate the information provided in reports from the senior leadership team, Ofsted, external consultants;
- To observe the impact of school improvement strategies.

During the Visit

- Governors will respect confidentiality always but will also have due regard for safeguarding policy and procedures;
- Governors will remember that they **are not** visiting the school in an inspectorial role;
- Governors will comply with and observe any school rules and/or routines.

After the visit

- Governors will thank the school staff;
- Governors will discuss their school visit with the Headteacher;
- Governors will respect rules of confidentiality always;
- Governors will complete the relevant Proforma for their visit;
- Governors will circulate and present the report to other members of the Local Governing Board at their next full meeting.

3. Policy Status and Review

The Board of Trustees has agreed to this Policy and, as such, it applies to all Schools within the Trust. Please note that should any further national guidance be issued by external agencies that are relevant to this policy, it will be updated accordingly prior to the review date shown below and re-circulated.

Date approved: September 2020

Review date: August 2024

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Chair of the Board of Trustees

Annex 1: Record of Visit

Name:	
Date:	

Purpose of visit

(How does the visit relate to a priority in the School Development Plan and/or an aspect of the School's self-evaluation document?)

Type here...

Governor observations and comments

(E.g. What did you see? What did you learn? What would you like clarified? How long did the visit last?)

Type here...

Key issues arising for the Local Governing Board

Type here...

Date shared with the Headteacher:	
Date shared with the Local Governing Board:	

Action agreed

(record any action agreed by the Local Governing Board regarding this visit)

Type here...

Annex 2: Questions to ask

The following questions are based on questions in the National Audit Office publication *'Improving School Performance. A guide for school governors'*, and the Ofsted briefing for inspectors *'The quality of teaching and the use of assessment to support learning'*. Use them as a guide in a meeting or on school visits – it is not intended you work systematically through the list.

Discuss with the Headteacher how best to use these questions to help you gradually build up a picture of the Academy's strengths and areas for development. Think about what evidence could be provided in relation to each question. For example, you wouldn't need to ask if children were proud of their work if you observed them in class, sharing their work with their peers, pointing out where their work is displayed, taking it home to show their parents.

Making learning attractive to children

- What processes do we have in place to involve pupils in decision making, such as school council or pupil access to the Local Governing Board? How do we know they are effective?
- To what extent do these processes represent the views of all pupils, including those from minority groups, those with learning difficulties and those who rarely ask or answer questions? How do we know? What have we done in response listening to pupils?
- Have we carried out subject audits to find out how interested and motivated pupils are in lessons and what things they like or dislike about the subject? What were the findings? What action has been taken?
- Do teaching staff have regular joint planning meetings to discuss what teaching and learning approaches work best across the curriculum to interest and motivate pupils? Have there been any significant changes in practice? If so, what impact have they had?
- How do subject leaders gain access to, and keep up to date with, resources that are proven to involve pupils most effectively in teaching and learning? Are they being used to best effect? Are we achieving value for money?
- What training do teaching staff have to ensure they understand how information and communications technology such as interactive whiteboards or iPads can best be used to make learning attractive to pupils? How effective is it?
- Are pupils engaged, working hard, making a good effort, applying themselves, concentrating and productive?
- Are pupils happy with their work? Are they proud of it?
- Are pupils interested in their work and in what they are learning? Or are they easily distracted?
- Are resources sufficient?

Quality of learning

- Are pupils making links between previous/new learning?
- Are pupils working independently? Are they self-reliant?
- How well do pupils collaborate with each other?
- How well do pupils follow routines/expectations?

Monitoring pupils' achievements

- Does the School have a culture of high expectations and achievement? How do we know?
- Are the School's targets 'stretching' enough for all pupils? How do we know?
- Are we meeting, exceeding or not meeting targets? Do we understand why?

- Are governors and staff understanding and using the various sources of information about the school's performance, including Analyse School Improvement reports? If not, how can we improve confidence and competence in data analysis?
- Are our systems to monitor pupils' achievements effective, both in identifying pupils who are working at relatively low levels as well as more able pupils who could move on more quickly? How do we know?
- Do we identify subject and year groups' specific strengths and weaknesses and put action plans in place to tackle weaknesses? What impact are these having?
- What new skills and knowledge are pupils gaining?

Further questions relating to pupils' achievement

- What are children's results in English and mathematics? How do they compare with previous years and with other schools/academies?
- Where have we improved? Do we know why?
- Are there differences between the achievement of different year groups or key stages, and if so, why?
- What percentage of children met their targets/exceeded their targets/failed to meet their targets?
- Are there significant differences in the performance of:
 - children eligible for free school meals
 - girls and boys (NB reading and writing)
 - children in care
 - children eligible for pupil premium funding
 - child carers
 - pupils with special educational needs
 - very able pupils
 - pupils with English as an additional language and the others
 - the majority and any other minority groups, such as travellers?

In meetings with the assessment leader you could explore:

- Key Stage test and teacher assessment results (anonymised).
- The work of a range of pupils – average, below average and above average (anonymised).
- The impact of assessment and tracking data in identifying pupils in need of targeted support
- The impact of the academy's curriculum focus – e.g. move towards a mastery approach
- Analyse School Performance data, Fischer Family Trust and other pupil progress and achievement data.

Special Needs

- How are pupils with special educational needs integrated into lessons?
- How have Individual Education Plans (IEPs) been adapted to support children in their lessons?

Communication

- How are parents kept informed about pupil progress?
- What steps are being taken to encourage parents to support their children's learning?
- How are governors kept informed about standards and the progress of pupils?
- How do governors celebrate the School?

Gifts and Hospitality Policy

1. Rationale

The Boleyn Trust with all its constituent schools is committed to the highest level of integrity, honesty and accountability in all its business dealings. All trustees, staff, directors and councillors are expected to maintain high standards of propriety and professionalism in all their dealings, ensuring they are free from any conflict of interest through their business in the name of the Trust.

Definitions

A Gift is any item or service which is received free of charge; or personally offered at a discounted rate or on terms not available to the general public.

Hospitality is the offer of food, drink, accommodation or entertainment or the opportunity to attend any cultural or sporting event not available to the general public.

Prevention of Fraud and Bribery Act 2010 makes it a criminal offence to:

- Offer, promise or give a bribe,
- Request agree to or accept a bribe, (by an organisation) fail to prevent bribery by those acting on its behalf ('associated persons') to obtain or retain business or a business advantage for the organisation.

Under this act, a bribe is 'a financial or other advantage' offered, promised or given to induce a person to perform a relevant function or activity improperly, or reward them for doing so.

2. Policy Statement

In order to protect all adults involved with the trust, and the reputation of the trust from accusations of bribery or corruption staff must take extreme care that none of their dealings, directly, or indirectly, could be deemed as a reward or benefit, in line with the Bribery act 2010. This act makes it a criminal offence.

The trust will hold a Gifts and Hospitality Register (**Annex 1**).

It is common for appreciative parents and students/pupils to register their thanks for the work of staff in the form of a small personal gift. If these are valued at less than £30 these are perfectly acceptable with reference to senior members of staff. These will not need to be added to the register.

Hospitality in the form of working lunches, coffees etc. are perfectly acceptable, and it would be appropriate to offer this to gain cordial relationships in support of good relationships with visiting staff or business colleagues. These would not be added to the register.

If a member of staff is offered a gift or hospitality whilst involved in the procurement of goods and services, tenders for work or when liaising with anyone conducting business with the trust other than light refreshments, it is their responsibility to discuss this with the Chief Finance and Operating Officer before accepting such benefit within 5 days. If acceptable, this would need adding to the register.

If not accepting a gift would be regarded as causing offence, (such as a sudden and unexpected gift, or one where it would cause cultural offence) the item should be accepted. The matter should then be brought to the attention of the Chief Executive Officer as soon as possible who may decide to return the gift, discuss it with the Chair of Board of Trustees, or/and may donate it to a trust raffle/ fair or a charitable cause.

Examples of gifts or hospitality that should not be accepted are cash or monetary gifts; gifts or hospitality offers to a member of your family; gifts or hospitality from a potential supplier or tendered in the immediate period before tenders are invited or during the tender process. Where a gift is received on behalf of the trust, the gift remains the property of the trust.

All gifts/hospitality over the value of £30 must be recorded in the trust's Gift and Hospitality Register, whether accepted or not.

Instances of non-compliance

In the case where it is believed a member of staff, trustee, or local governor has not declared a gift or hospitality, then a formal investigation will be instigated by the Chief Finance and Operating Officer/Chair of the Trust Board. This may take the form of disciplinary procedures in the case of employees if misconduct is indicated.

3. Policy Status and Review

The Board of Trustees has agreed to this Policy and, as such, it applies to all Schools within the Trust. Please note that should any further national guidance be issued by external agencies that are relevant to this policy, it will be updated accordingly prior to the review date shown below and re-circulated.

Date approved: September 2020
Review date: August 2024

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Chair of the Board of Trustees

Freedom of Information Policy

1. Rationale

Introduction: what a publication scheme is and why it has been developed

One of the aims of the Freedom of Information Act 2000 (which is referred to as FOIA in the rest of this document) is that public authorities, including all maintained trusts, should be clear and proactive about the information they will make public.

To do this we must produce a publication scheme, setting out:

The classes of information which we publish or intend to publish; The manner in which the information will be published; and Whether the information is available free of charge or on payment.

The scheme covers information already published and information which is to be published in the future. All information in our publication scheme is available in paper form.

Some information which we hold may not be made public, for example personal information.

This publication scheme conforms to the model scheme for trusts approved by the Information Commissioner.

2. Policy Statement

Aims and Objectives

The trust aims to:

enable every child to fulfil their learning potential, with education that meets the help every child develop the skills, knowledge and personal qualities needed for life and work and this publication scheme is a means of showing how we are pursuing these aims.

Categories of information published

The publication scheme guides you to information which we currently publish (or have recently published) or which we will publish in the future. This is split into categories of information known as 'classes'. These are contained in section 6 of this scheme.

The classes of information that we undertake to make available are organised into four broad topic areas:

- Governance documents
- Pupils & Curriculum
- Trust Policies and
- other information related to the trust

How to request information

If you require a paper version of any of the documents within the scheme, please contact the trust by telephone, email, or letter.

Contact details are set out below:

Address: The Boleyn Trust, Tollgate Primary School, Barclay Road, London E13 8SA
Telephone: 020 7476 1848
Email: info@boleyntrust.org

To help us process your request quickly, please clearly mark any correspondence “**FOI REQUEST**”

If the information you’re looking for isn’t available via the scheme, you can still contact the trust to ask if we have it.

Paying for information

Information published on our website is free, although you may incur costs from your Internet service provider. If you don’t have Internet access, you can access our website using a local library or an Internet café.

If your request means that we have to do a lot of photocopying or printing, or pay a large postage charge, or is for a priced item such as some printed publications or videos we will let you know the cost before fulfilling your request.

Feedback and Complaints

We welcome any comments or suggestions you may have about the scheme. If you want to make any comments about this publication scheme or if you require further assistance or wish to make a complaint then initially this should be addressed to: The Chief Operations Officer, The Boleyn Trust, Tollgate Primary School, Barclay Road, London E13 8SA (info@boleyntrust.org).

If you are not satisfied with the assistance that you get or if we have not been able to resolve your complaint and you feel that a formal complaint needs to be made, then this should be addressed to the Information Commissioner’s Office. This is the organisation that ensures compliance with the Freedom of Information Act 2000 and that deals with formal complaints.

They can be contacted at: Information Commissioner
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF

Enquiry/Information Line: 01625 545 700

E Mail: publications@ic-foi.demon.co.uk

Website : www.informationcommissioner.gov.uk

3. Policy Status and Review

The Board of Trustees has agreed to this Policy and, as such, it applies to all Schools within the Trust. Please note that should any further national guidance be issued by external agencies that are relevant to this policy, it will be updated accordingly prior to the review date shown below and re-circulated.

Date approved: September 2020

Review date: August 2024

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Chair of the Board of Trustees

Central Funding and Appeals Policy

1. Rationale

The Academies Financial Handbook makes clear that a Multi-Academy Trust has the freedom to amalgamate a proportion of general annual grant (GAG) funding from all its academies to form one central fund to be used to meet the normal running costs at any of its constituent academies within the trust. Whilst this is often referred to as 'top-slicing', the Boleyn Trust call this our Central Support Fund.

The Department for Education currently recommend a top slice of between 4 and 10%. For the academic years 2020/ 2022, the Boleyn Trust will retain only 5% of constituent academies GAG funding excluding:

- Pupil Premium Funding
- Year 7 Catch Up funding
- Any academy specific sports grants
- Universal Free School Meals Funding
- Other non-GAG Government Funding
- Top-Up Funding for special educational needs (SEN)- or Additional Educational Needs funding (AEN) in mainstream academies
- Other income generated by individual schools

2. Policy Statement

As the Boleyn Trust is a relatively new trust, the Board seek to ensure that transparency, prudence and fairness underpin its planning in welcoming new partner schools. The Boleyn Trust will give consideration to the funding needs and allocations of each constituent school.

There is an appeals mechanism which is described within this policy document for schools who may feel that they are being treated unfairly by the Boleyn Trust Central Support Fund.

A statement will be issued to constituent academies no later than 31 August for the next academy year detailing the funds to be retained by the Boleyn Trust. The constituent schools will have a period of 10 working days to appeal.

The Central Support Fund will be used to fund the following expenditure on behalf of the schools within the Boleyn Trust:

- Chief Executive Officer.
- Chief Finance and Operating Officer.
- Finance Specialist.
- Director of Learning.
- HR Manager.
- Estates Manager.
- Executive Business Manager.
- Internal and External Audit costs.
- HR and Legal Services costs.
- Health and Safety costs.
- Education and Skills Funding Agency (ESFA) returns costs.
- Bank charges.

- Annual actuary re-valuation fees (initial actuary valuation to be funded from Academy Conversion Grant).
- In-house CPD for staff including NQT training.
- Board and Board Committee Clerking (excluding local governing boards)
- Payroll administration and pension returns.
- Support in training and up-skilling of administration and finance staff to meet trust-wide demands.
- Development of trust-wide lead practitioners in key areas.
- External School Improvement costs.
- School to School support costs.
- Access to the Teaching School.

Outside of the Central Support Fund, the trust will work collaboratively and use its purchasing power on those high-value purchases/services to ensure that we provide best value for taxpayers and ensure we target as much money to front-line children.

Separate accounts relating to the running of the trust will be maintained and made available to all Boleyn Trust schools.

Schools joining the trust will be expected to fund the following from their conversion grant or from any Revenue or Capital reserves held to allow them to be fully integrated into the Boleyn Trust Management systems:

- Implementation of Financial Management System
- Any legal costs related to the conversion - including maintenance and upgrades for the above on an on-going basis.

The Boleyn Trust reserves the right to amend this policy on an annual basis at the beginning of each financial year. Where appropriate the Central Support Fund may be adjusted to reflect the costs relating to that financial year, the increasing services provided directly by the Boleyn Trust or cost savings generated through streamlining of back-office functions. The Central Support Fund will be kept under regular review by the Central Operations Team. As the Trust's work develops recommendations from the Central Operations Team will be considered by the Audit Committee.

GAG Pooling

GAG pooling can help to alleviate financial pressures within individual schools during periods of fluctuating income and expenditure. In the immediate future, however, the Boleyn Trust will not retain any additional amount in addition to the Central Support Fund.

The Boleyn Trust reserves the right to review the relative benefits of introducing a pooling policy on an annual basis at the beginning of each financial year. The Headteachers Board will be fully consulted before a proposal is put to the Board. If implemented, where appropriate pooling may be adjusted to reflect the costs incurred in the previous financial year.

Appeals

The Academies' Financial Handbook states:

“If a constituent academy’s principal feels that the academy has been unfairly treated, they should first appeal to the trust. If the academy’s principal grievance is not resolved, they can then appeal to the Secretary of State, via the ESFA, whose decision is final and who can disapply the provisions for pooling” (Section 5.30)

The Boleyn Trust appeals process is:

- The constituent schools have 10 working days from the issuing of a Boleyn Trust settlement statement from the Boleyn Trust Chief Finance and Operating Officer to the school to appeal;
- Appeals should be made in writing directly to the Chief Executive officer;
- The Chief Executive Officer will consider the appeal and notify the school of her/his decision within 10 working days of receipt of the written appeal

3. Policy Status and Review

The Board of Trustees has agreed to this Policy and, as such, it applies to all Schools within the Trust. Please note that should any further national guidance be issued by external agencies that are relevant to this policy, it will be updated accordingly prior to the review date shown below and re-circulated.

Date approved: **September 2020**

Review date: **August 2024**

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Chair of the Board of Trustees

Complaints Policy

1. Dealing with complaints – Initial concerns

It is important to be clear about the difference between a concern and a complaint. Taking informal concerns seriously at the earliest stage will reduce the numbers that develop into formal complaints.

The policy which follows deals with complaints, but the underlying principle is that concerns ought to be handled, if at all possible, without the need for formal procedures. The requirement to have a complaints procedure need not in any way undermine efforts to resolve the concern informally. In most cases the class teacher or the individual delivering the service in the case of extended School provision, will receive the first approach. It would be helpful if staff were able to resolve issues on the spot, including apologising where necessary.

2. Dealing with complaints – Formal Procedures

The formal procedures will need to be invoked when initial attempts to resolve the issue are unsuccessful and the person raising the concern remains dissatisfied and wishes to take the matter further.

3. Framework of Principles

Our Complaints Procedure:

- encourages resolution of problems by informal means wherever possible;
- is easily accessible and publicised;
- is simple to understand and use;
- is impartial;
- is non-adversarial;
- allows swift handling within agreed time-limits for action and keeping people informed of progress;
- ensures a full and fair investigation;
- respect people's desire for confidentiality;
- addresses all the points at issue and provide an effective response and appropriate redress, where necessary;
- provides information to the School's senior management team so that services can be improved.

4. Investigating Complaints

At each stage, the person investigating the complaint makes sure that they:

- establish what has happened so far, and who has been involved;
- clarifies the nature of the complaint and what remains unresolved;
- meets with the complainant or contacts them (if unsure or further information is necessary);
- clarifies what the complainant feels would put things right;
- interviews those involved in the matter and/or those complained of, allowing them to be accompanied if they wish;
- conducts the interview with an open mind and is prepared to persist in the questioning;

- keeps notes of the interview.

5. Resolving Complaints

At each stage in the procedure the School will keep in mind ways in which a complaint can be resolved. It might be sufficient to acknowledge that the complaint is valid in whole or in part. In addition, it may be appropriate to offer one or more of the following:

- an apology;
- an explanation;
- an admission that the situation could have been handled differently or better; an assurance that the event complained of will not recur;
- an explanation of the steps that have been taken to ensure that it will not happen again;
- an undertaking to review School policies in light of the complaint.

It would be useful if complainants were encouraged to state what actions they feel might resolve the problem at any stage. An admission that the School could have handled the situation better is not the same as an admission of negligence.

6. Vexatious Complaints

This procedure should limit the number of complaints that become protracted. However, there will be occasions when, despite all stages of the procedures having been followed, the complainant remains dissatisfied. If the complainant tries to reopen the same issue, the Chair of the Local Governing Body or CEO is able under this policy to inform them in writing that the procedure has been exhausted and that the matter is now closed.

7. Time-limits

Complaints need to be considered, and resolved, as quickly and efficiently as possible using time limits published in this policy. However, where further investigations are necessary, new time limits can be set and the complainant sent details of the new deadline and an explanation for the delay.

8. Publicising the complaints policy and procedure

The Governing Body will publicise the complaints policy and procedure in:

- the School prospectus (if they have one);
- the information given to new parents when their children join the School;
- any Home-School agreement;
- the School website.

9. Confidentiality

The investigation of any complain will be kept confidential at all stages and any papers provided to those investigating or adjudicating on complaints will be marked confidential and destroyed, except for the file copy, which itself, will be confidential.

10. Stage one: Complaint heard by staff member

- 10.1 It is in everyone's interest that complaints are resolved at the earliest possible stage. The experience of the first contact between the complainant and the School can be crucial in determining whether the complaint will escalate. To that end, staff will be periodically made aware of the procedures so that they know what to do when they receive a complaint. It is important to remind all staff involved about the importance of maintaining confidentiality at all times during the complaints process.
- 10.2 Parents should never feel or be made to feel that a complaint made in a reasonable and appropriate way will be taken amiss or will reflect adversely on the student or his/her opportunities at the School. The School will try to investigate and try to resolve every complaint in a positive manner and will treat every complaint as an opportunity to improve our service.
- 10.3 The School will try to respect the views of a complainant who indicates that he/she would have difficulty discussing a complaint with a particular member of staff. In these cases, the matter will be referred to a Deputy Headteacher or to the Headteacher who may, if they feel it appropriate, refer the complainant to another staff member. Alternatively, they may not feel this is necessary. Where the complaint concerns the Headteacher, the complainant can be referred to the Chairman of Governors or CEO.
- Put right any matter which may have gone wrong
 - Review our systems and procedures in the light of the relevant circumstances
 - NB complaints brought by staff should be investigated using the Grievance procedure and not this Complaints Policy.
 - Only complaints received in writing (preferably using the Complaints form (Annex 3) will be considered.
 - Anonymous complaints will not be considered.
 - Complaints must be made within 3 months of the event. Complaints after this period will not be considered.
 - The person dealing with the complaint will investigate the complaint.
- 10.4 Similarly, if the member of staff directly involved feels too compromised to deal with a complaint, the Deputy Headteacher or Headteacher may consider referring the complainant to another staff member. The member of staff may be more senior but does not have to be. The ability to consider the complaint objectively and impartially is crucial.
- 10.5 Where the first approach is made to a governor, the next step would be to refer the complainant to the appropriate person dealing with the complaint. Governors should not act unilaterally on an individual complaint outside the formal procedure or be involved at the early stages in case they are needed to sit on a panel at a later stage of the procedure.
- 10.6 The person dealing with the complaint will ensure that a written or oral acknowledgement is provided to the complainant within 5 School term time days of receiving a complaint. The acknowledgement will give a brief explanation of the School's complaints procedure and will give a target date for providing a response to

the complaint which should normally be within 10 School term time days. If the target cannot be met a letter should be written within 10 School term time days explaining the reason for the delay and providing a revised target date.

- 10.7 The person dealing with the complaint will seek to meet or speak with all of the appropriate people in order to establish the facts relating to the complaint, if the information given on the complaints form necessitates this. This may include the complainant, staff and any other person.
- 10.8 Once all of the facts have been established the person dealing with the complaint will then produce a written response to the complainant, or may wish to meet the complainant to discuss/resolve the matter directly.
- 10.9 A written response should contain an outline of the complaint and a summary of the response to the complaint including the decision reached and the reasons for it. Where appropriate this should also include what response the School will take to resolve the complaint. This may be by way of a general description e.g. 'Action taken within the Disciplinary Procedure'.
- 10.10 When the investigation has been concluded the complainant and the member of staff concerned will be informed in writing of the outcome. This may be to the effect that:
 - There is insufficient evidence to reach a conclusion, so the complaint cannot be upheld
 - The concern was not substantiated by the evidence
 - The concern was substantiated in part or in full. Some details may then be given of the action the School may be taking to review procedures etc. but details of the investigation or of any disciplinary procedures will not be released.
 - The matter has been fully investigated and that appropriate procedures are being followed which may be strictly confidential (e.g. where staff disciplinary procedures are being followed)
- 10.11 This letter or report must be endorsed by the Headteacher. It should also inform the complainant that should he/she wish the complaint to progress to the second stage of this procedure then he/she should send a written request stating this to the Headteacher within 10 School term time days of receiving the response.
- 10.12 If no further communication is received from the complainant within 10 School term time days, it is deemed that the complaint has been resolved and should end.

11. Stage two: Complaint heard by Headteacher

- 11.1 If the complainant is dissatisfied with the way the complaint was handled at stage one, they may go to Stage 2 and have the Headteacher hear the complaint. The Headteacher may delegate the task of collating the information to another staff member but not the decision on the action to be taken.
- 11.2 The same timings as in Stage 1 will apply.

12. Stage three: Complaint heard by Governing Body complaints appeal panel

- 12.1 The complainant needs to write to the Clerk to the Governors or CEO as directed by the Headteacher giving details of the complaint.
- 12.2 The Clerk to the Governors should write to the complainant acknowledging receipt of the written request for the complaint to be heard. This acknowledgement must be sent within 5 working days and should inform the complainant of the arrangements for hearing the complaint within 20 School term time days of receiving it. The letter should explain that the complainant has the right to submit any further documents relevant to the complaint. These must be received within 5 working days of the date of the hearing to allow adequate time for the documents to be circulated.
- 12.3 No person involved should have previous involvement in the complaint.
- 12.4 The Governors' appeal hearing is the last School-based stage of the complaints process and is not convened to merely rubber-stamp previous decisions.
- 12.5 Individual complaints would not be heard by the whole Governing Body at any stage, as this could compromise the impartiality of any hearing set up for disciplinary purposes against a member of staff following a serious complaint.

The Governing Body may nominate a number of members with delegated powers to hear complaints at that stage, and set out its terms of reference. These include:

- drawing up its procedures;
 - hearing individual appeals;
 - making recommendations on policy as a result of complaints.
- 12.6 The Chairman or CEO will typically chair the Complaints Panel, but in their absence the panel can be drawn from the nominated members and may consist of three or five Governors. In this case the panel may choose their own Chairman. One member of the panel will be independent of the management and running of the school – the remaining members will be chosen from the Local Governing Body.
- 12.7 If the complaint is about the Headteacher a hearing by the CEO or Chairman of Governors becomes Stage Two. If the complainant is unhappy he/she needs to write to the Clerk of Governor where upon a panel of three to five governors will hear the complaint. One member of the panel will be independent of the management and running of the school and the remaining members will be Governors not previously involved in the complaint. Their decision will be final.

13. The remit of the complaints appeal panel

- 13.1 The panel can:
 - dismiss the complaint in whole or in part;
 - uphold the complaint in whole or in part;

- decide on the appropriate action to be taken to resolve the complaint;
- recommend changes to the School's systems or procedures to ensure that problems of a similar nature do not recur.

13.2 There are several points which any governor sitting on a complaints panel needs to remember:

- a) It is important that the appeal hearing is independent and impartial and that it is seen to be so. No Governor may sit on the panel if they have had a prior involvement in the complaint or in the circumstances surrounding it.
- b) The aim of the hearing, which needs to be held in private, will always be to resolve the complaint and achieve reconciliation between the School and the complainant. However, it has to be recognised the complainant might not be satisfied with the outcome if the hearing does not find in their favour. It may only be possible to establish the facts and make recommendations which will satisfy the complainant that his or her complaint has been taken seriously.
- c) An effective panel will acknowledge that many complainants feel nervous and inhibited in a formal setting. Parents often feel emotional when discussing an issue that affects their child. The panel Chairman will ensure that the proceedings are as welcoming as possible.

13.3 The Clerk to the Governors will write and inform the complainant and any witnesses, the panel etc. of the date and location of the meeting 5 working days in advance. The notification to the complainant should also inform him/her of the right to be accompanied to the meeting by a friend/ interpreter. The letter should explain how the meeting will be conducted and the complainant's right to submit further written evidence to the panel. The Headteacher has the right to bring representation if so desired.

13.4 Intervention of parallel investigations relevant to the complaint by the Police or social services may cause variation to these time scales. Any such variation will be notified to the complainant.

14. Hearing the complaint at the meeting

The aim of the meeting will be to resolve the complaint and achieve reconciliation between the School and the complainant.

In the interest of natural justice, the introduction of previously undisclosed evidence or witnesses would be a reason to adjourn the meeting so that the other side has time to consider and respond to the new evidence.

The recommended conduct of the meeting is as follows:

- a) The Chairman of the panel will welcome the complainant, introduce the panel members and explain the procedure.
- b) The Chairman of the panel will invite the complainant to explain the complaint.
- c) The Committee members may question the complainant about the complaint and the reasons why it has been made.

- d) The Headteacher will be invited by the Chairman of the panel to question the complainant about the complaint and why it has been made.
- e) The Chairman of the panel will invite the Headteacher to make a statement in response to the complaint. At the discretion of the Chairman of the panel the Headteacher may invite members of staff directly involved in the complaint to supplement his/her response.
- f) The Committee members may question the Headteacher and/or members of staff about the response to the complaint.
- g) The Chairman of the panel will allow the complainant to question the Headteacher and/or members of staff about the response to the complaint.
- h) Any party has the right to call witnesses, subject to the approval of the Chairman of the Committee.
- i) The Committee, the Headteacher and the complainant have the right to question any such witness.
- j) The Headteacher will be invited by the Chairman of the panel to make a final statement.
- k) The complainant will be invited by the Chairman of the panel to make a final statement.
- l) The Chairman of the panel will explain to the complainant and the Headteacher that the decision of the panel will now be considered, and a written decision will be sent to both parties within 15 working days. The Chairman of the panel will then ask all parties to leave except for members of the Committee.
- m) The Committee will then consider the complaint and all the evidence presented and;
 - i. Reach a decision on the complaint and the reasons for it.
 - ii. Decide upon the appropriate action to be taken to resolve the complaint.
- n) The Governors sitting on the panel need to be aware of the complaint's procedure before the meeting.

15. Roles and Responsibilities

15.1 The Role of the Clerk

The clerk is the contact point for the complainant and is required to:

- set the date, time and venue of the hearing, ensuring that the dates are convenient to all parties and that the venue and proceedings are accessible;
- collate any written material and send it to the parties in advance of the hearing; meet and welcome the parties as they arrive at the hearing;
- record the proceedings;
- notify all parties of the panel's decision.

15.2 The Role of the Chairman of the Panel. The Chairman of the Panel has a key role, ensuring that:

- the remit of the panel is explained to the parties and each party has the opportunity of putting their case without undue interruption; the issues are addressed;
- key findings of fact are made;
- parents and others who may not be used to speaking at such a hearing are put at ease;

- the hearing is conducted in an informal manner with each party treating the other with respect and courtesy;
- the panel is open minded and acting independently;
- no member of the panel has any involvement in an earlier stage of the procedure; each side is given the opportunity to state their case and ask questions;
- written material is seen by all parties.

16. Recording

- 16.1 The panel will make findings and recommendations after the hearing and a copy of those findings will:
- i. be provided to the complainant and, where relevant, the person complained about;
 - ii. available for inspection on the school premises;
- 16.2 A written record of those findings will be kept of all formal complaints that are received and:
- i. whether they are resolved following a formal procedure, or proceed to a panel hearing;
 - ii. the action taken by the school as a result of those complaints (regardless of whether they are upheld);
- 16.3 All correspondence, statements and records relating to individual complaints are to be kept confidential except where the Secretary of State or a body conducting an inspection under section 109 of the Education and Skills Act 2008 requests access to them.

3. Policy Status and Review

The Board of Trustees has agreed to this Policy and, as such, it applies to all Schools within the Trust. Please note that should any further national guidance be issued by external agencies that are relevant to this policy, it will be updated accordingly prior to the review date shown below and re-circulated.

Date approved: **September 2020**
 Review date: **August 2024**

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Chair of the Board of Trustees

Annex 1: Checklist for a panel hearing

The panel needs to take the following points into account:

- The hearing is as informal as possible.
- Witnesses are only required to attend for the part of the hearing in which they give their evidence. Students may not appear as witnesses, but they may provide statements.
- After introductions, the complainant is invited to explain their complaint, and be followed by their witnesses.
- The Headteacher may question both the complainant and the witnesses after each has spoken.
- The Headteacher is then invited to explain the School's actions and be followed by the School's witnesses.
- The complainant may question both the Headteacher and the witnesses after each has spoken.
- The panel may ask questions at any point.
- The complainant is then invited to sum up their complaint.
- The Headteacher is then invited to sum up the School's actions and response to the complaint.
- Both parties leave together while the panel decides on the issues.
- The Chairman explains that both parties will hear from the panel within a set time scale.

Annex 2: Flowchart



Annex 3: Complaints Form

CONFIDENTIAL

Please complete and return to the Headteacher who will acknowledge receipt and explain what action will be taken.

Your name	:	
Address	:	
Postcode	:	
Daytime telephone number	:	
Evening telephone number	:	

If you are the parent of a pupil who attends the school, please provide their name and your relationship:

Please give details of your complaint:

What action, if any, have you already taken to resolve your complaint.
(who did you speak to and what was the response?)

What actions do you feel might resolve the problem at this stage?

Are you attaching any paperwork? If so, please give details:

Signature:

Date:

Date acknowledgement sent

:

By who

:

Complaint referred to

:

Date

:

Code of Conduct for Members, Directors (Trustees) and Local Governors

1. Introduction

- 1.1 This code of conduct was approved by the Board on **10 September 2019** in accordance with **Article 137 (b)** of the **Articles of Association (2019)** for Boleyn Trust.
- 1.2 This Code is intended as a guide, to indicate the standards of conduct and accountability which are expected of Members, Trustees, and Local Governors to enable them to understand their legal and ethical duties and to assist them both in carrying out those duties and in their relationship with the Boleyn Trust and the Chief Executive Officer. This Code therefore is aimed at promoting effective, well informed and accountable governance, and is not intended to be a definitive or authoritative statement of the law or good practice.
- 1.2 As a public office-holder, Members, Trustees and Local Governors behaviour and actions must be governed by the principles set out in this Code of Conduct and in accordance with the Seven Principles of Public Life (which have become known as the Nolan Principles), as outlined in section 3 of this Code. It is their responsibility to ensure that they are familiar with, and comply with, all the relevant provisions of the Code.
- 1.3 If a Member, Trustee or Local Governor is in doubt about the provisions of this Code or any documents referenced, the Chief Finance and Operating Officer should be consulted and, if necessary, professional advice should be obtained. However, ultimate responsibility for the appropriateness of conduct and for any act or omission in that capacity rests with the individual.
- 1.4 This Code applies to every committee, Local Governing Body or working party of the Trust. Each Member, Trustee and Local Governor will declare on an annual basis that they are eligible to serve in their respective capacity.
- 1.5 By accepting appointment to the Boleyn Trust, each person agrees to accept the provisions of this Code.

2. Interpretation

- 2.1 'ESFA' means the Education and Skills Funding Agency or any successor body;
- 2.2 'DfE' and 'BIS' means respectively the Department for Education and the Department for Business, Innovation and Skills or successor body;
- 2.3 'Trust' and/or 'Company' means the Boleyn Trust;
- 2.4 'Member', 'Trustee' and 'Local Governor' means respectively the Members of the Trust, Trustees of the Trust, and Local Governing Body members of the Schools;
- 2.5 'Chair' and 'Clerk' means respectively the Chair of the Board of Trustees of the Trust and the Clerk to the Board;
- 2.6 'Committee' means the Committees of the Board, including Local Governing Bodies of the Schools;

- 2.7 All other definitions have the same meaning as given in the Articles of Association; and
- 2.8 Words imparting one gender impart any gender.

3. Key principles of public life

- 3.1 The key principles upon which this Code of Conduct is based are the Seven Principles of Public Life. These are:

Selflessness	You should take decisions solely in terms of the public interest. You should not do so in order to gain financial or other material benefits for yourself, your family or your friends.
Integrity	You should not place yourself under any financial or other obligation to outside individuals or organisations that might, or might be perceived to, influence you in the performance of your official duties.
Objectivity	In carrying out public business, including awarding contracts and recommending individuals for rewards and benefits, you should make choices on merit.
Accountability	You are accountable for your decisions and actions to the public and must submit yourself to whatever scrutiny is appropriate for your office.
Openness	You should be as open as possible about the decisions and actions that you take. You should give reasons for your decisions and restrict information only when the wider public interest clearly demands.
Honesty	You have a duty to declare any private interests relating to your public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.
Leadership	You should promote and support these principles by leadership and example.

- 3.2 These principles should inform the actions and decisions of Members, Trustees and Local Governors in their work with the Trust.

4 Aims and values

- 4.1 The Boleyn Trust is committed to being actively involved in the economic, social and cultural development of the communities it serves. The Trust's vision, together with the corporate objectives of the Trust as agreed by the Members and Board of Trustees from time to time, seek to encapsulate the core purposes and aims of the Trust. Trustees should have due regard to these purposes and aims when conducting the business of the company and considering the activities and proposed activities of the Trust.
- 4.2 The Trust is committed to ensuring that it conducts its business in accordance with

the highest ethical standards as set out in more detail in this Code.

- 4.3 The Trust recognises its obligations to all those with whom it has dealings, including employees, pupils, suppliers, other educational institutions and the wider community.

In particular, the Trust is committed to:

- Combating any discrimination within the Trust on the grounds of the characteristics protected by the Equality Act 2010;
- Engaging with the wider community which the Trust serves in order to understand and meet its needs, in accordance with the Trust's vision.

5. Duties

- 5.1 Members, Trustees and Local Governors owe a fiduciary duty to the Trust. This means that they should show it the highest loyalty and act in good faith in its best interests. Each individual should act honestly, diligently and (subject to the provisions appearing in paragraph 11 of this Code relating to collective responsibility), independently. The actions of the Members, Trustees and Local Governors should promote and protect the good reputation of the Trust and the trust and confidence of those with whom it deals.
- 5.2 Decisions taken by Trustees, Members and Local Governors at meetings of the Trust and its committees must not be for any improper purpose or personal motive. Decisions taken must always be for the benefit of the Trust, its pupils and staff and other users of the Trust and must be taken with a view to safeguarding public funds. Accordingly, Trustees must not be bound in their speaking and voting by mandates given to them by other bodies or persons.
- 5.3 Trustees must observe the provisions of the Memorandum and Articles of Association and in particular the responsibilities given to the Board of Trustees under Company and Charity law.
- 5.4 Members, Trustees and Local Governing Bodies should comply with the Memorandum and Articles of Association, Schemes of Delegation and Terms of Reference of the Board's Committees to ensure that the Trust conducts itself in a proper, fair, open and transparent manner and only exercises its powers for the purpose for which they are conferred. Trustees should promote the success of the Trust for the benefit of its stakeholders.
- 5.5 Members, Trustees and Local Governing Bodies should also have regard to the different, but complementary, responsibilities given to the Chief Executive Officer of the Trust. It is the Members' function to determine strategic policy and overall direction and to monitor the performance of the Trust. It is the Board of Trustees' responsibility to monitor the performance of the CEO. It is the CEO's role to implement the Board's decisions, and to manage the Trust's affairs within the budgets and framework fixed by the Board. Board members (Trustees) should work together so that the Board and the Chief Executive perform their respective roles effectively.
- 5.6 Members, Trustees and Local Governors should refer to the Chief Finance and

Operating Officer for advice relating to the governance functions.

6. Statutory accountability

- 6.1 Members, Trustees and Local Governors are collectively responsible for observing the duties set out in the Articles of Association, the Trust's Funding Body Agreement and the Academies Financial Handbook.
- 6.2 The Accounting Officer of the Trust is directly responsible and accountable to Parliament for ensuring that the use to which the Trust puts its funds are consistent with the purposes for which the funds were given and comply with the conditions attached to them. He may be required to appear before the Committee of Public Accounts, alongside the ESFA's Accounting Officer, to give an account of regularity and propriety of all expenditure of its funds and for ensuring value for money by the Trust.
- 6.3 The Board of Trustees is accountable to Parliament for ensuring the financial health of the Trust, and to the Courts for ensuring that the Trust is conducted in accordance with Company law and Charity law.

7. Skill, care and diligence

- 7.1 Members, Trustees and Local Governors should in all their work for the Trust exercise such skill as they possess, and such care and diligence as would be expected from a reasonable person in the circumstances. This will be particularly relevant when they are acting as agents of the Trust; for example, when functions are delegated to a committee of the Board or to the Chair. They should be careful to act within the terms of reference of any committees on which they serve.

8. Powers

- 8.1 Board members are responsible for taking decisions which are within the powers given to the Trust by company law and through the provisions of the Articles of Association, clauses 4 - 9 (Object). If a Trustee thinks that the Board is likely to exceed its powers by taking a particular decision, he or she should immediately refer the matter to the Chief Finance and Operating Officer for advice.

9. Conflicts of Interest

- 9.1 Members, Trustees and Local Governors must ensure that no conflict arises, or could reasonably be perceived to arise, between their public duties and their private interests financial or otherwise.
- 9.2 They must comply with the Trust's Policy on handling conflicts of interests. As a minimum, these will require them to declare publicly any private interests which may, or may be perceived to, conflict with their public duties. The Policy will also require them to remove themselves from the discussion or determination of matters in which they have a financial interest. In matters in which they have a non-financial interest, you should not participate in the discussion or determination of a matter where the interest might suggest a danger of bias.

- 9.3 Members, Trustees and Local Governors are reminded that under the Articles of Association they must not receive any remuneration for their role, save as the CEO of the Trust and staff members of the Local Governing Bodies, save where this would be permitted under Article 6.7 and 6.8 in accordance with charity law and where necessary with the consent of the Charity Commission.
- 9.4 They are reminded that under the Articles of Association, company law and charity law, they must disclose to the Trust any direct or indirect financial interest they have, or may have, in the supply of work to the Trust or the supply of goods and services for the purposes of the Trust, or in any contract or proposed contract concerning the Trust, or in any other matter relating to the Trust or any other interest of a type specified by the Trust in any matter relating to it, or any duty which is material and which conflicts or may conflict with the interests of the Trust.
- 9.5 They are responsible for ensuring they are familiar with the Trust's Policy on Conflicts of Interests and that their personal declaration within the Trust's register of members' interests is accurate and up to date.
- 9.6 If an interest of any kind (including an interest of a spouse or partner of a Members, Trustees and Local Governor or of a close relative or his/her partner or spouse) is likely or would, if publicly known, be perceived as being likely to interfere with the exercise of their independent judgement, then they must refer to the provisions of the Conflict of Interest Policy.
- 9.7 For the purpose of clause 9.6 "close relative" includes but is not limited to a father, mother, brother, sister, child, grandchild and stepfather / mother / brother / sister / child.
- 9.8 The Clerk will maintain a Register of Interests which will be open for public inspection. Members, Trustees and Local Governors must disclose routinely all business interests, financial or otherwise, which they may have, and the Clerk will enter such interests on the Register. They must give sufficient details to allow the nature of the interests to be understood by enquirers and should inform the Clerk whenever their circumstances change, and interests are acquired or lost. In deciding whether an interest should be disclosed, they should have regard to the meaning given to "interest" in paragraphs 9.6 and 9.7 of this code.

10. Gifts and Hospitality

- 10.1 Members, Trustees and Local Governors may not accept gifts, hospitality or benefits of any kind from a third party which might be in breach of the Bribery Act 2010 and the Trust's Anti-Fraud and Bribery Policy or be seen to compromise their personal judgement or integrity. Any offer or receipt of such gifts, hospitality or benefits should immediately be reported to the Chief Finance and Operating Officer.
- 10.2 They must never canvass or seek gifts or hospitality.
- 10.3 They should inform the Chief Finance and Operating Officer of any offer of gifts or hospitality and ensure that, where a gift or hospitality is accepted, this is recorded in a public register in line with the Trust's policy.

- 10.4 They are responsible for their decisions on the acceptance of gifts or hospitality and for ensuring that any gifts or hospitality accepted can stand up to public scrutiny and do not bring the Trust into disrepute.

11. Collective Responsibility

- 11.1 The Boleyn Trust operates by taking majority decisions in a corporate manner at quorate meetings. Therefore, a decision of the Members, Board of Trustees or Local Governors, even when it is not unanimous, is a decision taken by that body collectively and each individual member has a duty to stand by it, whether or not he or she was present at the meeting when the decision was taken. Members, Trustees and Local Governing Body members should respect the principle of collective decision-making and corporate responsibility.
- 11.2 They should not use, or attempt to use, the opportunity of public service to promote their personal interests or those of any connected person, firm, business or other organisation.
- 11.3 If they disagree with a decision taken by the Board, their first duty is to have any disagreement discussed and recorded in Minutes. If the person strongly disagrees, he or she should consult the Chair and, if necessary, raise the matter with the Board of Trustees when it next meets. If no meeting is scheduled, the Articles of Association (clause 110) make provision for a meeting to be called by any three Trustees, by giving notice in writing to the Chief Finance and Operating Officer. Trustees shall then be given notice in writing by the Clerk, together with an Agenda, at least 7 clear days prior to the meeting.

12. Openness and Confidentiality

- 12.1 The requirements of the Companies Act and the Charities Act emphasise the need for public accountability. The importance of conducting business openly and transparently is paramount. Accordingly, agendas, minutes and other papers relating to meetings of the Trust are normally available for public inspection once approved for publication by the Chair (Article 124).
- 12.2 There will be occasions when the record of discussions and decisions will not be made available for public inspection (Article 125); for example, when the Board considers sensitive issues or named individuals and for other good reasons. Such excluded items will be kept in a confidential file by the Chief Finance and Operating Officer and will be circulated in confidence to Trustees.
- 12.3 Some confidential items are likely to be of a sensitive nature for a certain period of time only (for example information relating to a proposed commercial transaction or collaboration with another institution). The Board should specify how long such items should be treated as confidential or, if this is not possible, such items should be regularly reviewed to consider whether the confidential status should be removed or whether the public interest in disclosure outweighs that confidential status and the item made available for public inspection. When considering such issues, the Trust Board must also consider the requirements of the Freedom of Information Act 2000.
- 12.4 It is important that the Trust and its committees (including Local Governing Bodies)

have full and frank discussions in order to take decisions collectively. To do so, there must be trust between those with a shared corporate responsibility for decisions. They should keep confidential any matter which, by reason of its nature, the Chair or members of any committee of the Board are satisfied should be dealt with on a confidential basis.

- 12.5 Members, Trustees and Local Governors should not make statements to the press or media or at any public meeting relating to the proceedings of the Trust or its committees without first having obtained the approval of the Chair of the Board of Trustees or, in his or her absence, the Vice Chair. It is unethical for them to publicly criticise, canvass or reveal the views of others which have been expressed at meetings of the Trust or its committees.
- 12.6 The Trust must investigate all allegations of irregularity (unlawful or unethical) conduct, financial malpractice, equality and diversity issues and health and safety risks to staff, pupils or the public.

13. Attendance at Meetings

- 13.1 A high level of attendance at meetings of Members, the Board and Local Governing Bodies is expected so that members can perform their functions properly.

14. Training and Development

- 14.1 The Trust shall seek to ensure that all Trustees and Local Governors are appointed on merit in accordance with an open selection procedure determined by the Board and drawn widely from the communities that the Trust works with and serves, so as to be representative of those communities. The Board should have regard to the provisions relating to the membership of the Board in the Articles of Association, the need to combat discrimination and to promote equality, and the need to make available a range of necessary skills and experience to ensure that the Board carries out its functions effectively.
- 14.2 Trustees and Local Governing Body members must obtain a thorough grounding in their duties and responsibilities by participating in training and ongoing development from time to time, including training which may relate to their specific role, e.g., as a Safeguarding Link Governor. All new Boleyn Trust Governors are required to undertake induction training and Chairs are required to undertake Chair's training.
- 14.3 In order to promote effective governance, the Board and Governing Bodies should carry out an annual review of their performance as part of a continuing and critical process of self-evaluation.

15. Agreement to Code of Conduct

- 15.1 By signing this Code of Conduct, you agree to abide by the standards set out in the Code and in the linked policies for the duration of your appointment.
- 15.2 You understand and agree that it is your responsibility to inform the Chief Finance and Operating Officer of the details of any arrest, criminal conviction or caution made against you by the police at any time.

16. Declaration

I have read and agree to abide by this Code of Conduct. I agree to inform the Chief Finance and Operating Officer of:

1. the details of any arrest, criminal conviction or caution made against me by the police at any time; and
2. the details of any interests under the Conflict of Interest Policy; and
3. the details of any gifts / hospitality under the Gifts and Hospitality Policy.

Signed:

Full name: **ASHA CHOOLHUN**

Signed:

Full name: **CLIVE-ANTHONY DOUGLAS**

Signed:

Full name: **MOHAMMED MAMUN**

Signed:

Full name: **PHILLIP MINNS**

Signed:

Full name: **NINA PANAYIS**

Signed:

Full name: **PATRICIA REGIS**

Signed:

Full name: **JOHN ROLFE**

Signed:

Full name: **ROSEMARY TEHRANI**

Signed:

Full name: **CARLY CLARKE**

Business Charge Card Policy

1. Rationale

The Boleyn Trust is committed to ensuring that its systems of financial governance conform to the requirements of both propriety and sound financial management.

This includes making sure that there are adequate controls in place over the use of the business charge cards. These enable the schools in the Trust to purchase goods/services where the company being used provides the best value but an invoice cannot be raised or a credit account cannot be set up. They are particularly useful for making purchases over the internet.

The business charge cards are provided by our bankers, Lloyds Bank. They are not a credit card as academy trusts are unable to borrow under ESFA regulations, but are a payment card which are paid off in full each month. Purchases are charged to the budget and must be authorised in accordance with the Financial Scheme of Delegation.

This Policy is intended to provide guidance and assistance in the correct and responsible use of the business charge cards.

2. Policy Statement

Each card issued will be in the name of the Headteacher on behalf of the school the member of staff is attached to, or to the trust if they are linked to the central team, each card will have an identification number.

Each member of staff who has a card issued to them is to be made aware of the limit of their individual card and keep within this limit. They must sign an agreement which states they understand the conditions of issue (**Annex 1**).

Any staff member who has been issued with a card and subsequently terminates their employment with the Boleyn Trust must return their card which will be destroyed on receipt.

Members of staff found to be breaching the terms and conditions for use of their card will have the card confiscated and disciplinary action may also be taken.

Restrictions

Limits for authorising expenditure, at order stage, are as detailed in the Boleyn Trusts Financial Scheme of Delegation. Use of the card by a cardholder who is not the budget holder should only be made on receipt of an order signed by the authorised budget holder.

The Business Charge Card must not be used for any non-business or personal expense. Selected merchant/retailer types may be restricted by the card issuer to prevent expenditure on non-approved items.

The Business Charge Card must not be used for regular payments.

The Business Charge Card must not be used to obtain cash from an automatic transaction machine (ATM).

The Business Charge Card should not be used to obtain goods/services which can be procured via a normal credit account.

The school Business Charge Card should not be used to purchase fuel while travelling in a personally owned or leased vehicle. Reimbursement of this expenditure must be made via the travel expense claims process. The card may be used to purchase fuel for the school minibus and may also be used to purchase train tickets or toll road fees for business use as covered by the Staff Expenses Policy.

Only secure sites should be used to make online purchases (for example the website shows the padlock symbol). If there is any doubt as to whether it is a secure site, the purchase should not be made.

Business charge card insurance and/or subscriptions for card protection services must not be purchased.

Any costs/charges incurred arising as a result of a card being misused will be charged to the person responsible.

Record keeping, reconciliation and payment

Receipts/invoices are required to support every item of expenditure and a VAT receipt/invoice obtained if any purchases contain any VAT charges.

Statements will be issued by the bank which must be reconciled with receipts and signed off in accordance with the Financial Scheme of Delegation.

In the event of there being any expenditure on the statement that has not been authorised by the cardholder, the central team should be alerted immediately and the matter investigated with the bank.

Business charge expense forms must be submitted in a timely manner in accordance with the month end timetable provided to schools by the central team.

Authorised statements and supporting documents must be kept for a period of six years plus the current financial year so that they can be produced if an audit is undertaken.

All Business Charge Cards are linked to Lloyds Bank and will be paid off in full monthly by a direct business charge to the Trust current account.

Security

The Business Charge Card must be signed on receipt.

The Business Charge Card must be kept secure at all times and either held personally or stored in a locked drawer or filing cabinet.

PIN numbers must be kept secure and must not be written down nor disclosed to anyone.

Lost or stolen cards must be reported immediately to the Chief Finance and Operating Officer.

3. Policy and Status Review

The Board of Trustees has agreed to this Policy and, as such, it applies to all Schools within the Trust. Please note that should any further national guidance be issued by external agencies that are relevant to this policy, it will be updated accordingly prior to the review date shown below and re-circulated.

Date approved: September 2020

Review date: August 2024

.....
Chair of the Board of Trustees

Annex 1: Cardholder Agreement

I, **[your name]**, hereby acknowledge receipt of the Lloyds Business Charge Card: XXXX – XXXX – XXXX – [enter card last 4 digits only].

I understand that improper use of this card may result in disciplinary action as well as personal liability for any improper purchases. As a cardholder, I agree to comply with the terms and conditions of this agreement and the Credit Card Policies and Procedures for Five Colleges, Inc. I acknowledge receipt of the Credit Card Policies and Procedures and confirm that I understand the terms and conditions.

As a holder of this Business Charge Card, I agree to accept the responsibility and accountability for the protection and proper use of the card. I will return the card to the Chief Finance Officer upon demand during the period of my employment. I understand that the card is not to be used for personal purchases and that I must provide a receipt for every purchase. If the card is used for personal purchases or for purchases for any other entity or if I fail to provide a receipt substantiating a legitimate business expense by the end of the current month, the Boleyn Trust will be entitled to reimbursement from me of such purchases (through deduction of my paycheck). The Boleyn Trust shall be entitled to pursue legal action, if required, to recover the cost of such purchases, together with costs of collection and reasonable legal fees.

.....
Signature: Card Holder

.....
Date

.....
Signature: Chief Finance and Operating Officer

.....
Date