



The Kite Academy Trust

THE KITE ACADEMY TRUST

FINANCE POLICY

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1 Introduction

The purpose of this policy is to ensure that The Kite Academy Trust maintains effective and transparent systems of financial control which meet the requirements of the Funding Agreement between the Secretary of State for the Department for Education (DfE), the Academy Trust Handbook (ATH) and the Academies Accounts Direction published by the DfE, Companies Act 2006 and the appropriate Charities SORP.

This policy applies to all Members, Trustees, Governors and employees, and adherence to its principles and procedures is mandatory.

2 Roles & Responsibilities

All Members, Trustees, Governors and employees must adhere to the 'seven principles of public life' (as outlined in Appendix A) and all financial decisions must demonstrate regularity, propriety and value for money, as required by the Academy Trust Handbook. The specific roles and responsibilities of all groups of people or individuals who carry financial and assurance responsibilities within The Kite Academy Trust are outlined below:

Kite Academy Trust Board of Trustees

The Kite Academy Trust Board of Trustees has wide responsibilities as defined under statute, regulations and the Master Funding Agreement as follows:

- Agreeing the long-term financial objectives of the Trust;
- Ensuring that Grants from the DfE are used only for the purposes intended;
- Delegating day-to-day financial management of the Trust to the CEO;
- Approval of the annual budgets and any material changes;
- Receiving reports on the expenditure against budget;
- Making decisions on actual financial requests from Hub Board and Trust Board Committees;
- Appointment of internal auditors;
- Reviewing the reports of auditors;
- Authorising contracts according to approved limits;
- Approval of The Kite Academy Trust financial statements;
- Appointment of the Chief Executive Officer and the Director of Finance;
- Reviewing annually the Finance Policy and Scheme of Delegation;
- Reviewing annually the terms of reference of The Kite Academy Trust Committees;
- Approval of any companies, subsidiaries or joint ventures.

The Trustees evidence that their responsibilities are met through:

- Review of financial monitoring reports on a termly basis;
- Ensuring production of an Annual Report and Financial Statements in accordance with all finance policies, Academy Trust Handbook, Academies Accounts Direction and the appropriate Charity SORP;
- Benchmarking key performance indicators against similar academies;
- Governance Statement within the Annual Report and Financial Statements;
- Independent Reporting Accountant's Assurance Report on Regularity within the Annual Report and Financial Statements;
- Production and monitoring of a Risk Register;
- Minutes of meetings;
- Ensuring adequate insurance cover is in place compliant with statutory obligation.

The Kite Academy Trust Finance, Audit & Risk Committee

The Board of Trustees have appointed the Finance, Audit & Risk Committee to provide assurance over the suitability of, and compliance with, its financial systems and operational controls.

The Committee provides assurance to the Board that risks are being adequately identified and managed by:

- Reviewing the risks to internal financial control of the Trust;
- Agreeing a programme of work to address and provide assurance on those risks.

To support this work, the Finance, Audit & Risk Committee can recommend the appointment of any of the following:

- The Trust's external auditor (appointment made by the Members);
- The external auditor to perform a supplementary programme of work;
- An internal audit service;
- The appointment of a non-employed Trustee with appropriate level of qualifications and or experience who neither charge or are paid by the Trust for their work;
- A peer review.

Chief Executive Officer

The Chief Executive Officer (CEO) is the Accounting Officer (AO) with responsibility to Parliament and the Department of Education for the propriety and regularity of the public finances for which they are accountable. The responsibilities are outlined in the Academy Trust Handbook and include:

- The initial review and authorisation of the budget;
- The regular monitoring of actual expenditure and income against budget;
- Ensuring annual accounts are produced in accordance with the requirements of the Companies Act 1985;
- Ensuring that the regular reports to the Board are full and accurate;
- Authorising orders, payments and awards of contracts within approval limits;
- Authorising changes to the academies' personnel establishment.

The AO will advise the Board of Trustees in writing if, at any time, in their opinion, any action or policy under consideration by them is incompatible with the terms of the Articles of Association, Funding Agreement or the Academy Trust Handbook.

The AO evidences that their responsibilities are met through:

- Compliance with the scheme of delegation, ensuring separation of duties (Appendix B);
- Verifying that the appropriate period end procedures have been undertaken and management reports produced (Appendix C);
- Verifying that an accurate Fixed Asset Register is maintained;
- Production of a Risk Register and subsequent actions;
- Benchmarking key performance indicators against similar academies;
- Minutes from appropriate Trustee/Committee meetings;
- A review of Value for Money within the Governance Statement in the annual report and financial statements;
- Statement of Regularity, Propriety and Compliance in the annual report and financial statements.

Director of Finance

The main responsibilities of the Director of Finance are:

- The management of The Kite Academy Trust financial position at a strategic and operational level;
- The maintenance of effective systems of financial control;
- Submitting grant applications, reports and returns to the DfE, the Teacher's Pension Scheme and HMRC;
- Ensuring that annual accounts are properly presented and adequately supported;

- Overseeing the preparation of monthly management accounts;
- Overseeing virement decisions for agreed budgets, within delegated powers;
- Authorising orders, payments and the award of contracts within agreed limits.

The Director of Finance shows that their responsibilities are met through:

- Compliance with the scheme of delegation, ensuring separation of duties (Appendix B);
- Evidencing that the appropriate period end procedures have been undertaken and management reports produced (Appendix C);
- Monthly submission of management accounts;
- Ensuring that an accurate Fixed Asset Register is maintained;
- Risk Register and subsequent actions;
- Supporting benchmarking key performance indicators against similar academies;
- Minutes from Committee meetings;
- A review of Value for Money;
- Timely submission of DfE reporting requirements;
- Ensuring production of an Annual Report and Financial Statements that adhere to all financial/accounting policies.

All Employees

All employees have the following responsibilities:

- the security of Trust property;
- avoiding loss or damage to Trust property;
- ensuring economy and efficiency in the use of resources;
- conforming with the requirements of the Trust's financial policies and procedures;
- reporting any misuse of Trust property or resources to their Line Manager.

3 Internal Control

Internal Control Framework

The Kite Academy Trust has established a control framework that recognises public expectations about governance, standards and openness. The Trust internal control framework includes:

- Co-ordinating the planning and budgeting processes in accordance with the DfE Academies Planning Calendar;
- Applying discipline in financial management, including managing banking, debt and cash flow, with appropriate segregation of duties (Appendices B & C);
- Preparation of monthly budget monitoring reports;
- Ensuring that delegated financial authorities are respected (Appendix B);
- Effective planning and oversight of any capital projects (Procurement & Tendering Policy);
- The management and oversight of assets (Asset Register and Write off & Disposals Policy);
- The propriety and regularity of financial transactions (Appendix C);
- Reducing the risk of fraud and theft (Whistleblowing Policy);
- Ensuring efficiency and value for money in the organisation's activities (Procurement & Tendering Policy);
- A process for independent checking of financial controls, systems, transactions and risks (Independent review of internal controls & Risk Register).

Fraud

To ensure compliance with the Academy Trust Handbook, the Trust will report to the Department for Education any instance of fraud, theft or irregularity exceeding £5,000, as well as any unusual or systemic fraud below this threshold, in line with reporting obligations.

Please see The Kite Academy Trust Anti-fraud & Corruption Policy.

Whistleblowing

The Kite Academy Trust has a policy in place for whistleblowing and ensures that all staff are aware to whom they can report their concerns, and the way in which such concerns will be managed.

Please see The Kite Academy Trust Whistleblowing Policy.

Risk Management

The Kite Academy Trust has made a considered choice about its desired risk profile, taking account of its legal obligations, business objectives and public expectations. The recognised risks, and arrangements for managing present and future risks are recorded in the Trust's Risk Register.

The Trust's procedures for the management of risk include contingency and business continuity planning.

Insurance

The Kite Academy Trust ensures that it has adequate insurance cover in compliance with its legal obligations as follows:

- Opted into the academies risk protection arrangements (RPA);
- Made separate arrangements for the insurance of any risks not covered in the RPA (e.g. equipment).

4 Financial Planning, Monitoring & Reporting

The Trust will prepare both medium term and short-term financial plans to secure its long-term financial sustainability. The plans will be prepared having regard to all known needs of the Trust, its academies and (where applicable) the Asset Management Plan.

Budget

The annual budget will reflect the best estimate of resources available to the Trust for the forthcoming year and will detail how these resources will be utilised. The CEO is responsible for its approval by the Board of Trustees.

A balanced budget for all funds across the Trust, which can draw on unspent funds brought forward from previous years, will be submitted to the DfE annually in line with the required timeline and following their template. The Board of Trustees will notify the DfE within 14 days if it is formally proposing to set a deficit revenue budget for the current financial year which it is unable to address, after unspent funds from previous years are taken into account.

To ensure strong financial control and adherence to approved spending plans, budget virements must be authorised in accordance with The Kite Academy Trust Budget & Budget Amendment Policy.

Monthly finance reports will be prepared by the Director of Finance. The reports will detail actual income and expenditure against budget both for each academy within the Trust and at a summary level for the CEO, Executive Headteachers, Academy Headteachers, Governors and Trustees.

This is evidenced by the following:

- Minutes of meetings;
- The submission of the annual budget, informed by the academy improvement plans and approved by the Board of Trustees, to the DfE (Revenue & Capital);

- The submission of a three-year budget plan, informed by the Academy Improvement Plans to the Board of Trustees (Revenue & Capital);
- Cash flow statement submitted to Trustees by the Director of Finance.

Cash Management

The opening of all bank accounts must be authorised by the Board of Trustees who must set out the arrangements covering the operation of accounts, including any transfers between accounts and cheque signing arrangements.

Cash Management arrangements are as follows:

- The Trust's accounts must avoid going overdrawn;
- The Trust's cash flow position will be reviewed on a monthly basis. Where the cash flow position is such that the bank account might become overdrawn, then the CEO has the authority to request from the DfE an early advance of the monthly budget allocation;
- Bank and cash control accounts will be reconciled on a monthly basis by the Finance Team.

Investments

The Board of Trustees may invest to further the Trust's charitable aims, but will ensure that investment risk is properly managed. When considering making an investment the Board of Trustees will:

- Only act within their powers to invest as set out in The Kite Academy Trust Articles of Association;
- Have an Investment Policy to manage, control and track financial exposure, and ensure value for money;
- Exercise care and skill in all investment decisions, taking advice as appropriate from a professional;
- Ensure that security takes precedence over revenue maximisation;
- Review the Trust's investments and Investment Policy (on an annual basis);
- DfE approval will be sought for investment transactions that are novel and/or contentious.

Income Generation

The Kite Academy Trust sets fees for chargeable services at full cost, and only applies an additional rate of return when in a commercial environment. Fees and charges for the cost of public services to other Government funded companies or bodies will be determined at full cost as per annex 6.1 of HM Treasury's Managing Public Money. The Kite Academy Trust has the following policies in place to govern its income generating activities:

- Charging & Remissions Policy - covers items such as classroom sales, trips and activities in line with the DfE guidance for maintained schools;
- Income & Lettings Policy – outlines aims, principles and strategy used for dealing with lettings and contains a schedule of chargeable rates.

5 Delegated Authorities

Connected Party Transactions

Trustees understand and comply with their statutory duties as company secretaries to avoid conflicts of interest, not to accept benefits from third parties and to declare interest in proposed transactions or arrangements.

Connected Party Transactions are goods or services provided by individuals or organisations connected to the Trust. In order to ensure that there can be no real or perceived conflicts of interest, the Trust has adopted the Trading with Connected Parties Policy (Appendix E).

Novel and/or Contentious Transactions

Novel payments or other transactions are those of which the Trust has no experience, or are outside the range of normal business activity for the Trust. Contentious transactions are those which might give rise to criticism of the Trust by Parliament, the public and/or the media. Novel and/or contentious transactions will always be referred to the DfE by the Board of Trustees for explicit prior authorisation.

Borrowing

The Trust will seek the DfE's prior approval for borrowing (including finance leases and overdraft facilities) from any source, where such borrowing is to be repaid from grant monies or secured on assets funded by grant monies, and regardless of the interest rate chargeable.

Credit cards will only be used for business (not personal) expenditure, and balances cleared before interest accrues.

Gifts and Hospitality

The Trust has a procedure in place for the acceptance of gifts and hospitality. This includes a register on the acceptance of gifts, hospitality, awards, prizes or any other benefit which might be seen to compromise employees' personal judgement or integrity and ensures that all employees are made aware of this.

When giving gifts, the Trust ensures that the value of the gift is reasonable, is within the limits stated in the gifts and hospitality procedure, the decision is fully documented, and has due regard to propriety and regularity in the use of public funds.

Special Payments

Special payments are transactions that fall outside of the Trust's planned range of activities which include:

- Employee severance payments;
- Compensation payments;
- Ex gratia payments.

Employee Severance Payments

If the Trust is considering making an employee severance payment above the statutory or contractual entitlements, the Board of Trustees **will** consider the following issues:

- Whether the proposed payment is in the interests of the Trust;
- Whether the payment is justified, based on a legal assessment of the chances of the Trust *successfully* defending the case at employment tribunal;
- Where a legal assessment suggests that the Trust is likely to be successful, a settlement will not be offered;
- If the settlement is considered to be justified, then the Board of Trustees will consider the level of settlement.

Employee severance payments will not be made where they could be seen as a reward for failure, such as gross misconduct or poor performance. The only acceptable rationale in the case of gross misconduct would be where legal advice is that the claimant is likely to be successful in an employment tribunal claim because of employment law procedural errors.

The following schedule of delegation applies to severance payments:

Statutory/contractual payment	Non-statutory/non-contractual payment	DfE prior approval required?
£40,000	£49,999	No
£80,000	£49,999	No
£40,000	£50,000	Yes – for £50,000
£80,000	£50,001	Yes – for £50,001

Compensation Payments

The Trust will make appropriate compensation payments to provide redress for loss or injury, for example: personal injuries; traffic accidents; or damage to property.

If the Board of Trustees are considering making a compensation payment it will base its decision on a careful appraisal of the facts, including legal advice where relevant, and ensure that value for money will be achieved.

The Trust has delegated authority to approve individual compensation payments provided any non-statutory/ non-contractual element is under £50,000. Where the Trust is considering a non-statutory/ non-contractual payment of £50,000 or more, DfE's prior approval **will** be obtained.

Where a compensation payment has been necessitated by an event that reveals concerns about the effectiveness of internal control systems, the Board of Trustees will take any necessary steps to put failings right.

Ex gratia payments

Ex gratia payments are a type of transaction that goes beyond statutory or contractual cover or administrative rules e.g. payments to meet hardship caused by official failure or delay, and payments to avoid legal action on the grounds of official inadequacy. Ex gratia transactions will always be referred to the DfE by the Board of Trustees for prior authorisation.

Fixed Assets

Trustees recognise the need to maintain an inventory of equipment in the Trust in order to:

- Ensure that staff take responsibility for the safe custody of assets;
- Ensure proper physical control of equipment;
- To provide an up-to-date record of the equipment available for teaching purposes;
- To manage the effective utilisation of assets and to plan for their replacement;
- To provide a basis for insurance cover and claims if equipment is damaged or destroyed, e.g. by fire, theft, vandalism or other disaster;
- To enable external auditors to evaluate the annual accounts and the Trust's financial position.

Details of all Fixed Assets are recorded in The Kite Academy Trust Fixed Asset Register. Post conversion all fixed assets are reflected within the fixed assets register at the date that they are first brought into use. The Fixed Asset Register will be checked annually and certified correct by the Director of Finance. All discrepancies are to be notified to the CEO immediately.

The capitalisation threshold for the Trust is items valued at £1,000 or more at the time of purchase, either individually or as a set. Details of useful economic lives of assets, and levels of depreciation are recorded on the Fixed Asset Register. Disposal of fixed assets is governed by the Write off & Disposals Policy.

The Kite Academy Trust will obtain written approval from the Secretary of State, via the DfE, for the following:

- Acquiring a freehold on land or buildings;
- Disposing of a freehold on land or buildings;
- Disposing of heritage assets beyond any limits set out in the Trust's funding agreement in respect of the disposal of assets generally;
- Novel or contentious property transactions.

Leases

The Trust will only enter into operating leases e.g. rental agreements. The Trust will ask for the Secretary of State's consent if we wish to:

- take out a finance lease on any class of asset for any duration from another party, as this would represent borrowing;
- take up a leasehold or tenancy agreement on land or buildings from another party for a lease term of more than five years;
- grant a leasehold or tenancy agreement on land or buildings to another party for a lease term of more than five years.

Procurement and Tendering

The Trust has a policy in place for procurement and tendering that reflects the DfE, and EU Public Sector Procurement, low, medium and high level procurement procedures.

The Procurement & Tendering Policy includes appropriate guidance and the details of any appropriate approvals required regarding any operating lease arrangements that may be considered during a procurement process.

Please see The Kite Academy Trust Procurement & Tendering Policy.

Contract Management

The Trust review all contracts annually when the budget is set to determine which contracts are due for renewal in the coming year. This supports a timely, appropriate procurement process that supports the VFM aims of economy, efficiency, and effectiveness.

Managing Surplus General Annual Grant/Reserves

The Trust is committed to using our allocated General Annual Grant (GAG) funding for the full benefit of our current pupils. Any surplus balances will be supported by a clear plan for their use in the near future to benefit our pupils. This plan is detailed in our Reserves Policy and is integrated with the budget plans to support the short-term and long-term financial sustainability of the Trust.

Please see The Kite Academy Trust Reserves Policy.

Appendix A - The 7 Principles of Public Life

1. Selflessness

Holders of public office should act solely in terms of the public interest.

2. Integrity

Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.

3. Objectivity

Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

4. Accountability

Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

5. Openness

Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

6. Honesty

Holders of public office should be truthful.

7. Leadership

Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

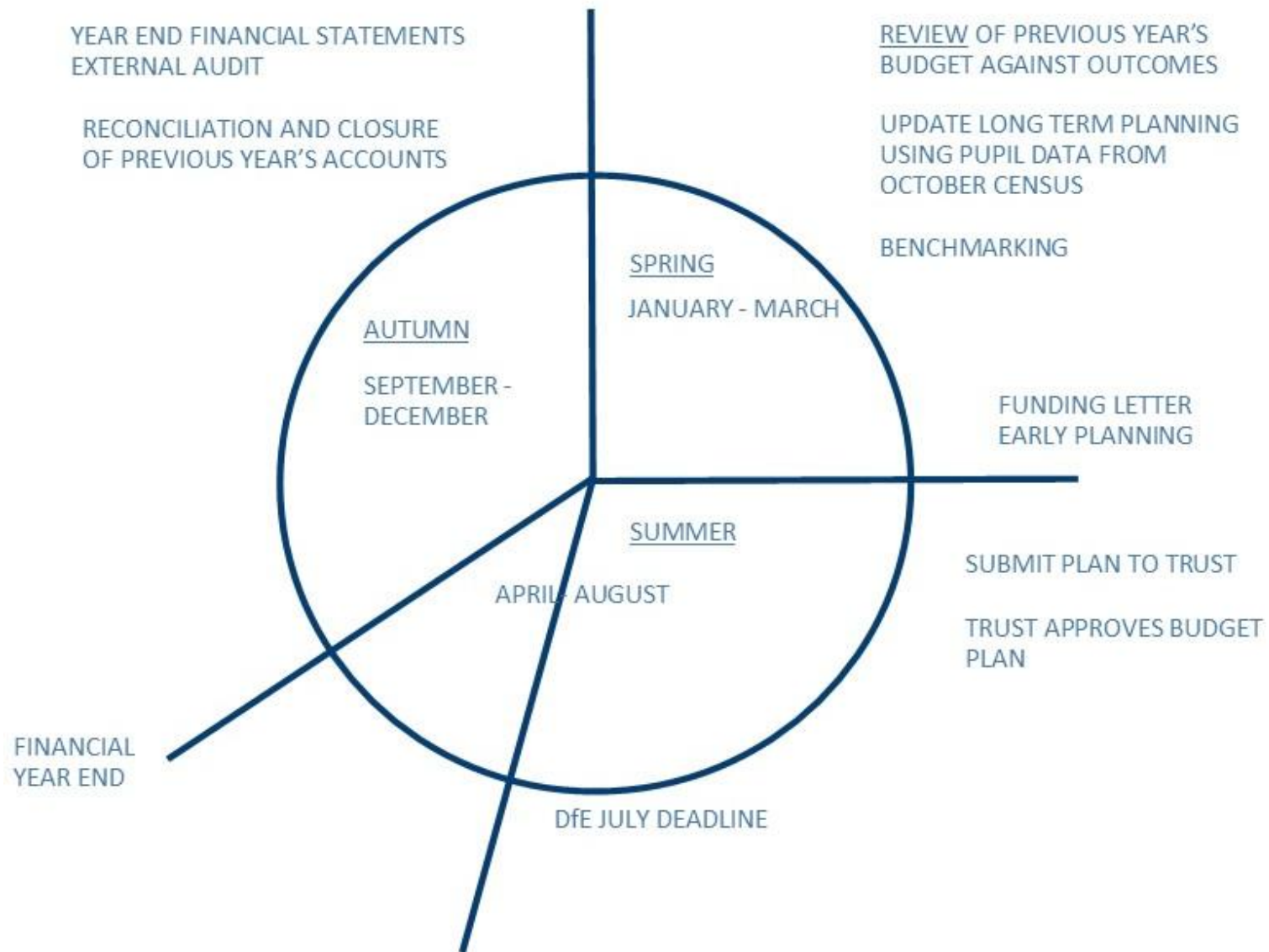
Appendix B - Kite Academy Trust Scheme of Financial Delegation

Delegated Responsibility	Value	Officer
Orders and payments for goods and services (includes petty cash, debit/credit card payments)	Up to £1.5k	1 signatory: Academy Headteacher
	£1.5k to £5k	1 signatory: Executive Headteacher/ Chief Education Officer
	Up to £5k	1 signatory: Business Services Team Manager
	£5k to £25k	1 signatory: Director of Finance/ Chief Education Officer/ Deputy CEO/ CEO
	£25k to £100k	2 signatories: Director of Finance/ Deputy CEO/ CEO
	+ £100k	3 signatories: 2 of Director of Finance/ Deputy CEO/ CEO plus Chair/ Vice Chair of Trustees
Signatory for BACS payment runs (including payroll)	Payment run to value of £750k	1 signatory: Director of Finance
All new staff contracts and contractual variation forms	All	2 signatories: Director of Finance and Academy Headteacher/ Executive Headteacher
All new contracts for goods and services	All	1 signatory: CEO / Director of Finance
Discretionary payroll payments	Up to £10k	2 signatories: Executive Headteacher/ Director of Finance/ Deputy CEO/ CEO
	+ £10k	2 signatories: Director of Finance/ Deputy CEO/ CEO/ Chair/ Vice Chair of Trustees
Signatory for DFE grant claims and DFE returns	Up to £100k	2 signatories: Director of Finance & CEO
	Over £100k	3 signatories: Director of Finance & CEO plus Chair/ Vice Chair of Trustees
Authority for disposal of unusable or obsolete items	Up to £10k	1 signatory: Director of Finance/ Deputy CEO/ CEO
	Over £10k	2 signatories: Director of Finance/ Deputy CEO/ CEO
Approval to write off debts or losses	Up to £10k	1 signatory: Director of Finance/ CEO
	Over £10k	2 signatories: Director of Finance & CEO

Appendix C - Monthly Control Account Reconciliation Schedule

Control Account	Nominal Balance	Supporting Document	Difference	Reason	Narrative
160210 FA: AUC: Additions DfE Cap Grant(work in progress)					Should agree to the CIF schedule
240100 CA: Debtors <1 year: Debtors control account					Should agree to Aged DR report
240220 CA: Debtors <1 year: Accrued DfE revenue grant					Should agree to Accruals & Prepayments schedule
240250 CA: Debtors <1 year: Accrued income - other					Should agree to Accruals & Prepayments schedule
240300 CA: Debtors <1 year: Prepayments (less than)					Should agree to Accruals & Prepayments schedule
240350 CA: Debtors <1 year: VAT recoverable					Should agree to outstanding VAT returns
260100 CA: Bank Accounts: Central Bank Account					See bank reconciliation
26010B CA: Bank Accounts: Treasury Account					See bank reconciliation
Varies CA: Bank Accounts: Bank Account 1 (Local)					See bank reconciliation
Varies School Fund					Should agree to SF balance per bank
310100 LB: Creditors <1 year: Trade Creditors (P I slip)					Should agree to Aged CR balance
310160 LB: Creditors <1 year: Credit Card					Should be zero or needs a comment
310200 LB: Creditors <1 year: Loans					Should be zero or needs a comment
310350 LB: Creditors <1 year: Other creditors					Should agree to Accruals & Prepayments schedule
310700 LB: Creditors <1 year: Other accruals					Should agree to Accruals & Prepayments schedule
360100 LB: Payroll control account: Payroll					Should be zero or needs a comment
360101 LB: Payroll control account: NI					Should agree to TP CR per payroll report
360102 LB: Payroll control account: Teachers Pension					Should agree to LGPS CR per payroll report
360103 LB: Payroll control account: LGPS					Should agree to PAYE/NI CR per payroll report

Appendix D - The Annual Budget Cycle



Appendix E - Trading with Connected Parties Policy

Principles Applying to Connected Party Relationships

Connected Party Transactions are goods or services provided by individuals or organisations connected to The Kite Academy Trust.

At Cost Requirements

The Kite Academy Trust will pay no more than 'cost' for goods or services provided to it by the following persons ('services' do not include services provided under a contract of employment):

- Any member or trustee of the Trust;
- Any individual or organisation connected to a member or Trustee of The Kite Academy Trust.

For these purposes the following persons are connected to a member, or Trustee:

- A relative of the member or Trustee. A relative is defined as: a close member of the family, or member of the same household, who may be expected to influence, or be influenced by, the person. This includes, but is not limited to, a child, parent, spouse or civil partner;
- An individual or organisation carrying on business in partnership with the member, Trustee or a relative of the member or Trustee;
- A company in which a member or the relative of a member (taken separately or together), and/or a Trustee or the relative of a Trustee (taken separately or together), holds more than 20% of the share capital or is entitled to exercise more than 20% of the voting power at any general meeting of that company;
- An organisation which is controlled by a member or the relative of a member (acting separately or together), and/or a Trustee or the relative of a Trustee (acting separately or together). For these purposes an organisation is controlled by an individual or organisation if that individual or organisation is able to secure that the affairs of the body are conducted in accordance with the individual's or organisation's wishes;
- Any individual or organisation that is given the right under the Trust's articles of association to appoint a member or Trustee of The Kite Academy Trust; or any body related to such individual or organisation;
- Any individual or organisation recognised by the Secretary of State as a sponsor of The Kite Academy Trust; or any body related to such individual or organisation

A body is related to another individual or organisation if it:

- Is controlled by the individual or organisation; or
- Controls the organisation; or
- Is under common control with the individual or organisation

For these purposes control means:

- holding more than 20% of the share capital (or equivalent interest); or
- having the equivalent right to control management decisions of the body; or
- having the right to appoint or remove a majority of the board or governing body

The 'at cost' requirement does not apply to the Trust's employees unless they are also one of the parties described above, i.e. connected to a member or Trustee of the Trust.

Whilst these provisions do not apply to contracts of employment, the same principles of securing value for money and using public money properly, including managing conflicts of interest, will still apply. Salaries paid should be appropriate to the individual's skills and experience and the salary rates paid in the wider market.

Should any staff/personnel of an individual or organisation connected to a member or Trustee of the Trust be based in, or work from the premises of, The Kite Academy Trust, that individual/ organisation and the Trust will agree an appropriate sum to be paid to the Trust for such use/occupation of the premises, save to the extent that they are carrying out work for the Trust.

At Cost/Full Cost – Definition for Provision or Receipt of Goods & Services

For these purposes the cost will be the ‘full cost’ of all the resources used in supplying the goods or services. Full cost includes:

- all direct costs (the costs of any materials and labour used directly in producing the goods or services);
- indirect costs (comprising a proportionate and reasonable share of fixed and variable overheads)

Full cost **will not** include an element of profit. Full cost for the provision of public services to other Government funded institutions will be determined as per annex 6.1 of HM Treasury’s Managing Public Money.

De Minimis for “At Cost/Full Cost” Transactions

The ‘at cost’ requirement applies to contracts for goods and services from a connected party exceeding £2,500, cumulatively, in any one financial year of the trust.

For these purposes, where a contract takes the Trust’s cumulative annual total with the connected party beyond £2,500, the element above £2,500 must be at no more than cost.

Professional Services

In relation to organisations supplying legal advice or audit services to The Kite Academy Trust, the ‘at cost’ requirement applies where the organisation’s partner directly managing the service is a member or Trustee of the Trust but not in other cases for those organisations. The published ethical standards for auditors also prevent partners or employees of the audit firm from acting as a Trustee of their client trust, but not of other trusts.

Documentation

The Kite Academy Trust will ensure that any agreement with an individual or organisation connected to a member or Trustee, as defined above, to supply goods or services to the Trust is properly procured through an open and fair process and is:

- Supported by a statement of assurance from that individual or organisation to the Trust confirming that their charges do not exceed the cost of the goods or services; and
- On the basis of an open book agreement including a requirement for the supplier to demonstrate clearly, if requested, that their charges do not exceed the cost of supply

Governor Allowances

The Trust will reimburse Members, Trustees and Governors for actual costs incurred in carrying out their duties as specified in the Expenses Policy.

Glossary of Terms

AAR	Academy Accounts Return - a financial return submitted to the DfE reflecting the Annual Financial Statements in a format appropriate for inclusion in the Whole Government Accounts
AO	Accounting Officer - the AO is responsible for compliance with the Academies Financial Handbook and Academies Accounts Direction. The individual must be a fit and suitable person for the role. In trusts comprising a single academy this should be the principal. In multi-academy trusts it should be the Chief Executive or Executive Principal
AoA	Articles of Association – the AoA set out the internal management, decision making and running of Kite Academy Trust and its liability. It forms an annex to the FA for each academy
CPT	Connected Party Transactions - CPT are transactions related to the provision of goods or services by individuals or organisations connected to The Kite Academy Trust
DfE	Department for Education - the DfE is the 'principal regulator' of academies. It is responsible for ensuring there is an adequate framework in place to provide assurance that all resources are managed in an effective and proper manner and that value for money is secured
FA	Funding Agreement - legally binding document between The Kite Academy Trust and the DfE
GAG	General Annual Grant - main funding grant received from the DfE
IS	Internal Scrutiny – this is a process for checking The Kite Academy Trust's financial systems, controls, transactions and risks
Trust	The Kite Academy Trust
MoA	Memorandum of Association - the MoA sets out the name of Kite Academy Trust. It provides for details of Trust members under the Companies Act 2006. It forms an annex to the FA for each academy
SORP	Statement of Recommended Practice - academies must comply with the Charity SORP
SoS	Secretary of State