



Internal Scrutiny Annual Report

2022-23

Hatfield Community Free School

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Executive Summary

Reviews undertaken: HR: June 23 Site Security: October 23 Statutory Policies & Website: January 23	Review provided by: Juniper Education Pharos Response Juniper Education	Overall Opinion: Good																							
<div style="text-align: center;"> <h3>Findings Summary</h3> <table border="1" style="margin: 10px auto; border-collapse: collapse;"> <caption>Findings Summary Data</caption> <thead> <tr> <th>Category</th> <th>Low</th> <th>Medium</th> <th>High</th> </tr> </thead> <tbody> <tr> <td>HR</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Site Security</td> <td>17</td> <td>20</td> <td>2</td> </tr> <tr> <td>Statutory Policies & Website</td> <td>10</td> <td>2</td> <td>0</td> </tr> </tbody> </table> </div>		Category	Low	Medium	High	HR	0	0	0	Site Security	17	20	2	Statutory Policies & Website	10	2	0	Total number of recommendations: 51 <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="background-color: #f8d7da;">High Priority</td> <td style="text-align: center;">2</td> </tr> <tr> <td style="background-color: #fff3cd;">Medium Priority</td> <td style="text-align: center;">22</td> </tr> <tr> <td style="background-color: #d4edda;">Low Priority</td> <td style="text-align: center;">27</td> </tr> </table>		High Priority	2	Medium Priority	22	Low Priority	27
Category	Low	Medium	High																						
HR	0	0	0																						
Site Security	17	20	2																						
Statutory Policies & Website	10	2	0																						
High Priority	2																								
Medium Priority	22																								
Low Priority	27																								

This report provides assurance that adequate controls are being operated within the trust, based on the understanding that the information provided during the review is accurate and complete. It should be noted however that recommendations to improve controls, if implemented, cannot guarantee that fraud or misappropriation could not occur.

Recommendations raised in the report issued should be considered by the board of trustees / Audit and Risk Committee to assist them in providing assurance over the suitability of, and compliance with, the systems and operational controls in place.

No fraud was identified or reported to us for the 2022-23 period. It remains the responsibility: of management to manage the control environment to help identify potential fraud and prevent the likelihood of fraud occurring.

Overall Opinion Criteria

Good	There is a sound system of internal control designed to manage risks. Many recommendations are of low-risk rating.
Satisfactory	There is generally a sound system of internal control processes, however there are a higher level of medium priority risks than low priority risks identified.
Requires Improvement	There are significant weaknesses in key areas in the systems of control, and a high number of high-risk recommendations have been identified in each review completed.
Poor	Many risks identified are of a high-risk nature, and there are significant process failings.

Introduction

The Academy trust handbook section 3.1 specifies “all academy trusts **must** have a programme of internal scrutiny to provide independent assurance to the board that its financial and non-financial controls and risk management procedures are operating effectively”. Providing that the trust has selected a scope of work for financial and non-financial controls and has considered its risk register, this Internal Scrutiny Report demonstrates how the trust meets the Academy trust handbook 2022 internal scrutiny requirements.

Please note that this report is an exception report and therefore only contains the details of any issues arising from the review of the scope of work detailed below.

Scope

The relevant board, informed by its risk register approved the below scope of work:

HR
Human Resource Management – Induction Processes
HR Policies and Procedures in-depth review – Content and compliance

Site Security
This includes a review of your policies and procedures and a detailed site survey to establish priorities, threats, challenges, and weaknesses. Your detailed report will provide practical advice, realistic recommendations and template documents covering:
alarms and monitoring systems
access control
visitor management
lockdown
emergency communications
VIPs
premises layout
crisis response plans

Statutory Policies & Website

The Juniper governance team maintain a policy tracker list. Policies provided by the trust are compared against this list to ensure all policies are in existence. Policy content of the selected policies will be reviewed, and any suggestions for improvements included in the final report.

Policy review - Protection of Biometric information

Policy review – Premises Management

Policy review - SEND

Review of renewal sign off and whether this complies with the Schedule of Delegation and other best practice guidance

Review of renewal frequency

Review of statutory information to be displayed on the website

Individual recommendations priority key:

A system of grading internal scrutiny findings, which have resulted in an action, has been adopted in order that the significance of the findings can be ascertained. Each finding is classified as High, Medium or Low. The definitions of each classification are set out below:

High Priority	Issues where there is a risk of significant financial impact on the trust that must be addressed immediately by the academy trust
Medium Priority	Issues where there is a risk of moderate financial impact on the trust, such as a control failure or the absence of a control in an area of moderate risk. These should be addressed soon.
Low Priority	Issues that relate to minor control deficiencies or enhancements in control efficiency. These should be addressed within an agreed timescale.

Summary of Findings

RAG	Finding	Recommendation
HR - Inductions		
	Checks performed to verify items listed in the scope of work found the systems to be in order and no issues were identified.	

RAG	Finding	Recommendation
Site Security		
Low Priority	Management could consider providing staff with conflicting resolution/difficult conversation training on a future INSET day. This training should give staff more confidence in dealing with parents who may present challenging behaviour towards staff members.	
Management Response:	<i>To be considered by SLT for inclusion in future staff training sessions.</i>	<i>Responsibility / Due Date: SLT by March 2024</i>
Low Priority	Encourage staff to be vigilant regarding parents' parking instead of dropping off or tailgating into the staff carpark and being prepared to politely challenge anyone doing either of the above.	
Management Response:	<i>Reminders to be issued to staff when a problem has been identified and the need to be vigilant to be included in the site security policy.</i>	<i>Responsibility / Due Date: Policy to be developed by SBM/Site Manager ready for approval at March 2024 FTB</i>
Low Priority	Encourage staff to be vigilant regarding tailgating into the staff carpark and be prepared to politely challenge anyone doing so.	
Management Response:	<i>Reminders to be issued to staff when a problem has been identified and the need to be vigilant to be included in the site security policy.</i>	<i>Responsibility / Due Date: Policy to be developed by SBM/Site Manager ready for approval at March 2024 FTB</i>

RAG	Finding	Recommendation	
Medium Priority	It is recommended that any hedging or low hanging tree canopies are trimmed back to reduce the opportunity for trespassers to use these as climbing aids.		
Management Response:	<i>This is monitored by the Site Manager as part of the grounds maintenance and parameter checks and additional work commissioned with our providers, John O Conner's where necessary.</i>	<i>Responsibility / Due Date:</i>	<i>On-going</i>
Low Priority	It is recommended that fire exits are regularly checked to ensure continued clear egress in the event that a school evacuation is required.		
Management Response:	<i>This is monitored by the Site Manager and all staff on a daily basis – reminders issued where necessary.</i>	<i>Responsibility / Due Date:</i>	<i>On-going</i>
Low Priority	Cycle security could be increased. Consideration could be given to improving security by encouraging parents and pupils to ensure they lock their own property when in the storage facility, through posters and/or briefings in school communications. Consideration could also be given to providing a lockable solution on the storage facility outside of school drop off and pick up times as bikes/scooters can attract opportunist offenders.		
Management Response:	<i>Reminders to parents, pupils and staff to be issued, including clear signage to lock property. Alternative provision outside of school drop off to be included on next review of asset management plan.</i>	<i>Responsibility / Due Date:</i>	<i>SBM and Site Manager to action by end of March 2024.</i>
Low Priority	If not already done so, consideration should be given to installing a silent alarm button in reception, linked to the alarm system that would initiate a police response.		
Management Response:	<i>To be explored and costed for consideration as part of the site security procedures.</i>	<i>Responsibility / Due Date:</i>	<i>Site Manager to action end of March 2024.</i>

RAG	Finding	Recommendation	
Medium Priority	We recommend the school considers improving the CCTV quality for the rear pedestrian gate by possibly replacing cameras with higher quality resolution/focal length to reach these areas. It is also strongly recommended that a CCTV monitor is installed in the school reception, so staff can monitor main entrances.		
Management Response:	<i>Explore the cost of improving the CCTV quality at rear and installing CCTV monitor in school reception area – include on asset management plan.</i>	<i>Responsibility / Due Date:</i>	<i>Site Manager/SBM by end of March 2024</i>
Medium Priority	It is highly recommended that a review of the security of the IT suite/server is undertaken and the cost of additional security measures, balanced against the cost of potential theft of IT equipment.		
Management Response:	<i>Explore the options and costs for increasing the security of the IT server room.</i>	<i>Responsibility / Due Date:</i>	<i>Site Manager/SBM in conjunction with HfL by end of March 2024</i>
Medium Priority	Consideration should be given to increasing the security of IT assets that can be easily moved by using cable locks or security cages for example.		
Management Response:	<i>Explore the options and costs for increasing the security of IT assets.</i>	<i>Responsibility / Due Date:</i>	<i>Site Manager/SBM in conjunction with HfL by end of March 2024</i>
Medium Priority	It is recommended that consideration be given to obtaining a lockable cabinet of security quality that can be bolted to the floor		
Management Response:	<i>Explore the costs of using a lockable cabinet of security quality and include on asset management plan.</i>	<i>Responsibility / Due Date:</i>	<i>Site Manager/SBM in conjunction with HfL by end of March 2024</i>

RAG	Finding	Recommendation	
Medium Priority	Consideration to be given on implementing a security marking system. The school maybe advised and assisted in this process by a local Herts Constabulary Crime Prevention Officer (CPO). The local Neighbourhoods Policing Team could possibly advise if there is a CPO and how to contact them.		
Management Response:	<i>Introduce and roll out security marking system for IT and high value items.</i>	<i>Responsibility / Due Date:</i>	<i>Site Manager/SBM by end of February 2024</i>
Medium Priority	We recommend that the current system of key control be reviewed as to its suitability. A system where keys are stored and issued, preferably from one location, with an appropriate recording system and overseen by a named person.		
Management Response:	<i>Introduce and monitor a robust and documented system of key storage, overseen by the Site Manager.</i>	<i>Responsibility / Due Date:</i>	<i>Site Manager/SBM by end of February 2024</i>
Medium Priority	It is strongly recommended that suitable and appropriate additional security controls are considered for managing master keys or those to security sensitive doors.		
Management Response:	<i>As above.</i>	<i>Responsibility / Due Date:</i>	<i>Policy to be developed by SBM/Site Manager ready for approval at March 2024 FTB</i>
Low Priority	It is recommended that consideration is given to creating a security policy, which compliments guidance provided by the DfE in their 'Guidance on school and college security ' (2019) https://www.gov.uk/government/publications/school-and-college-security/school-and-college-security		
Management Response:	<i>Site Security Policy to be written and approved by Trustees.</i>	<i>Responsibility / Due Date:</i>	<i>Policy to be developed by SBM/Site Manager ready for approval at March 2024 FTB</i>
Low Priority	When considering the implementation of a Security Policy, also consider how it could complement the existing school safeguarding policy.		
Management Response:	<i>This will be considered as part of the development of the Site Security Policy.</i>	<i>Responsibility / Due Date:</i>	<i>Policy to be developed by SBM/Site Manager ready for approval at March 2024 FTB</i>

RAG	Finding	Recommendation	
Low Priority	If, on consideration, a security policy is implemented it is recommended that security arrangements, policy and plans are regularly reviewed.		
Management Response:	<i>This will be included as part of the development of the Site Security Policy.</i>	<i>Responsibility / Due Date:</i>	<i>Policy to be developed by SBM/Site Manager ready for approval at March 2024 FTB</i>
Low Priority	It is recommended that the site security map be reviewed to ensure it shows locations of key security features, access points and service isolation points etc.		
Management Response:	<i>This will be included as part of the development of the Site Security Policy.</i>	<i>Responsibility / Due Date:</i>	<i>Policy to be developed by SBM/Site Manager ready for approval at March 2024 FTB</i>
Medium Priority	It is recommended that, if not already implemented, the new office structure to ensure continual staffing of school reception throughout the day is done so as soon as practicable.		
Management Response:	<i>The new structure allows the school office to be staffed for the school opening hours.</i>	<i>Responsibility / Due Date:</i>	<i>Implemented</i>
Low Priority	If not already done, we recommend periodic audits of the visitor management system be conducted to ensure compliance with this policy.		
Management Response:	<i>This will be included as part of the development of the Site Security Policy</i>	<i>Responsibility / Due Date:</i>	<i>Policy to be developed by SBM/Site Manager ready for approval at March 2024 FTB</i>
Medium Priority	We recommend the current lack delivery drivers access control be reviewed and an appropriate process be implemented.		
Management Response:	<i>This will be reviewed and a process included as part of the development of the Site Security Policy.</i>	<i>Responsibility / Due Date:</i>	<i>Policy to be developed by SBM/Site Manager ready for approval at March 2024 FTB</i>

RAG	Finding	Recommendation	
Medium Priority	It is highly recommended that a culture for all staff to wear an ID badge/lanyard is encouraged and noncompliance is challenged. This can enhance the professional image of the school and its staff and also enhance the security of the school, if all noncompliance is politely challenged by all staff.		
Management Response:	<i>Requirement to be communicated as part of staff induction and staff handbook with reminders issued to staff when necessary.</i>	<i>Responsibility / Due Date:</i>	<i>Ongoing</i>
Medium Priority	It is recommended that a review is conducted to identify all roles where wearing an ID badge/lanyard is not appropriate and ensure these staff members have access to school branded clothing		
Management Response:	<i>Work in progress for ensuring all staff members have access to school branding or an alternative means of ID where a lanyard is not suitable.</i>	<i>Responsibility / Due Date:</i>	<i>On-going and to be fully implemented by end of February 2024.</i>
Low Priority	There is already good use of radios to communicate with staff. If not already done so we recommend that consideration is given to the use of for all site staff, duty SMT member and school reception. This will aid communication in a security situation and serves as a deterrent to potential casual offenders.		
Management Response:	<i>Procedures already in place and operating well.</i>	<i>Responsibility / Due Date:</i>	<i>Implemented</i>
Low Priority	It is good to note that currently the system of electronic signing-in requires acknowledgement of the safeguarding policy. We remind of the importance of closely managing external users due to the potential security risk introduced by familiarity with using the site.		
Management Response:	<i>External users are closely monitored as part of our safeguarding procedures and processes.</i>	<i>Responsibility / Due Date:</i>	<i>Implemented</i>

RAG	Finding	Recommendation	
Low Priority	It is recommended any future security policy should include both the nursery and JAG as they are on the school estate. It is also recommended that a representative from the nursery and JAG should be invited to school Health & Safety meetings		
Management Response:	<i>This will be included as part of the development of the Site Security Policy and will be communicated to our school partners.</i>	<i>Responsibility / Due Date:</i>	<i>Policy to be developed by SBM/Site Manager ready for approval at March 2024 FTB</i>
Medium Priority	Guidance is provided by the DfE in their 'Guidance on school and college security ' (2019). It specifically provides templates for policies, regarding evacuation and 'invacuation' and we recommend the school uses this resource to inform itself, when reviewing it's security policy . https://www.gov.uk/government/publications/school-and-college-security/school-and-college-security .		
Management Response:	<i>To explore and consider whether to include in security policy.</i>	<i>Responsibility / Due Date:</i>	<i>Policy to be developed by SBM/Site Manager ready for approval at March 2024 FTB</i>
High Priority	It is highly recommended that the school considers implementing a clear operating procedure for lockdown. In the event of an immediate security incident, initiated by a clear method that is different to that used in the event of fire to enable staff and students to react appropriately and promptly. The use of a different toned alarm to that used for fire and is also recommended that these procedures are communicated with all staff and pupils and practice drills are conducted regularly.		
Management Response:	<i>Standalone critical incident policy to be produced and agreed by Trust Board.</i>	<i>Responsibility / Due Date:</i>	<i>Policy to be developed by Principal/SLT ready for approval at March 2024 FTB</i>
Medium Priority	A poster of bomb threat procedure is displayed in the reception office. It is recommended that these procedures are incorporated in a new Security policy should the school implement one and all staff made aware of these procedures. Please see my comments above regarding the information and templates available of the DfE website.		
Management Response:	<i>To form part of the site security policy.</i>	<i>Responsibility / Due Date:</i>	<i>Policy to be developed by SBM/Site Manager ready for approval at March 2024 FTB</i>

RAG	Finding	Recommendation	
High Priority	It is highly recommended that clear and effective procedures are introduced for dealing with a pupil reported missing from the site. Advice is contained on the DfE school and college security website. These procedures should be contained within a full security policy.		
Management Response:	<i>A flowchart exists to record the process for when a child does not turn up to school where no explanation has been provided by the parent/carer. Procedures to be documented for when a pupil is reported missing from the site.</i>	<i>Responsibility / Due Date:</i>	<i>Procedure to be developed by Principal/SLT ready for approval at March 2024 FTB.</i>
Medium Priority	It is highly recommended that clear and effective procedures are introduced for when and how to call the Police as informed by the NPCC's guidance to schools and these procedures should be briefed out to all relevant staff.		
Management Response:	<i>To document our current procedures as part of the site security policy which will be distributed to all staff.</i>	<i>Responsibility / Due Date:</i>	<i>Policy to be developed by SBM/Site Manager ready for approval at March 2024 FTB</i>
Medium Priority	It is highly recommended that the school establish a crisis response kit (grab bag) to be secured in reception/Head's office. Further information regarding planning for emergencies can be found on the UK Government website. https://www.gov.uk/government/publications/preparing-for-emergencies/preparing-for-emergencies .		
Management Response:	<i>Procedures to be reviewed against guidance and any necessary adjustments to be implemented and recorded in site security policy.</i>	<i>Responsibility / Due Date:</i>	<i>Office Manager in conjunction with SBM by end of February 2024.</i>
Low Priority	If not already done so, it is recommended that regular Health and Safety meetings include physical security, so any issues raised can be addressed in a timely manner. It is also good practice to minute these meetings with actions raised and how they were addressed, should they be questioned at a later date.		
Management Response:	<i>Future Health & Safety meetings to include physical security.</i>	<i>Responsibility / Due Date:</i>	<i>Site Manager in conjunction with Trustee link to be implemented at next meeting.</i>

RAG	Finding	Recommendation	
Medium Priority	As previously recommended above, consideration should be given to implementing a physical security policy. Without this policy in place, senior staff cannot evaluate or assess the impact any new initiatives may have on its day-to-day operation.		
Management Response:	<i>Site Security Policy to be developed and implemented.</i>	<i>Responsibility / Due Date:</i>	<i>Policy to be developed by SBM/Site Manager ready for approval at March 2024 FTB</i>
Low Priority	Consideration could be given to creating a WhatsApp group with other school site managers to share security information especially in real time should there be a security issue locally.		
Management Response:	<i>The school has an informal network with other local schools via the Principal and Site Manager relationships that have been established. Consideration to be given to this recommendation as part of the development of the site security policy.</i>	<i>Responsibility / Due Date:</i>	<i>Policy to be developed by SBM/Site Manager ready for approval at March 2024 FTB</i>
Low Priority	Consideration could be given to being proactive and contacting your local Neighbourhood Policing Team (NPT) and invite them to visit. You could ask for a named contact and suggest that when on patrol in the local area they are welcome to drop by into reception for a chat with staff at anytime. Good local informal relations can increase staff and pupils' feeling of safety, if a well-known local officer attends regularly, even if there is no official reason for the visit.		
Management Response:	<i>The school will continue to be proactive in contacting our local NPT.</i>	<i>Responsibility / Due Date:</i>	<i>Ongoing</i>
Medium Priority	As highlighted above consideration should be given to implementing a physical security policy. Within this policy the school lockdown procedures can be specified. It is good practice to carry out these procedures at the start of each term.		
Management Response:	<i>Will be considered as part of the development of the site security policy.</i>	<i>Responsibility / Due Date:</i>	<i>Policy to be developed by SBM/Site Manager ready for approval at March 2024 FTB</i>

RAG	Finding	Recommendation	
Medium Priority	As highlighted above, strong consideration should be given to implementing a physical security policy. Once this policy is in place, pupils can be made familiar with its requirements in an age-appropriate manner.		
Management Response:	<i>Consider will be given to this recommendation as part of the development of the site security policy and the best way for pupils to be made familiar with this requirements.</i>	<i>Responsibility / Due Date:</i>	<i>Policy to be developed by SBM/Site Manager ready for approval at March 2024 FTB</i>
Medium Priority	Once a new security policy is documented, it can inform how students can be provided with information and training in an age-appropriate manner about how to react in the event of a knife or firearms terrorist attack.		
Management Response:	<i>Consider will be given to this recommendation as part of the development of the site security policy and the best way for pupils to be made familiar with this requirements.</i>	<i>Responsibility / Due Date:</i>	<i>Policy to be developed by SBM/Site Manager ready for approval at March 2024 FTB</i>

RAG	Finding	Recommendation	
Statutory Policies & Website			
Low Priority	The website details opening and closing times and the total time this equates to in a typical week, however, break times are not mentioned.	It is recommended that reference is made to break times on the website.	
Management Response:	<i>Website now includes reference to a 15 minute morning break and a 1 hour lunchtime for EYFS and a 15 minute morning break and a 45 minute lunchtime for KS2</i>	Responsibility / Due Date:	<i>Completed by VH 18.1.23</i>
Low Priority	The SEND policy does not include a breakdown of where the SEND funding comes from.	It is recommended that the SEND policy includes reference to where the SEND funding comes from.	
Management Response:	<i>Policy reviewed with the funding information added. Will be provided to SEND Link Trustee to review and take to full board meeting on 15th March for approval.</i>	Responsibility / Due Date:	<i>SENCO/SEND link Trustee Approval at full board meeting on 15th March 2023</i>
Medium Priority	Trustee meeting minutes do not evidence that the SEND policy was approved.	Approval of policies should be clearly record in a set of trustee minutes.	
Management Response:	<i>This has been noted and will now be part of the procedures for updating and approving policies</i>	Responsibility / Due Date:	<i>SEND policy presented to full board meeting on 15th March 2023 for approval and noted in minutes</i>
Low Priority	The Premises Management policy should be reviewed annually according to the school schedule; however, the last date of review was September 2021.	Policies should be reviewed in accordance with regulations and the school's review schedule. Evidence of policy review should be recorded in trustee meeting minutes.	

<i>Management Response:</i>	<i>Premises Management Policy to be reviewed alongside the Health and Safety Policy Sep 22 to see if there are any gaps and to explore whether both policies should be combined going forward.</i>	<i>Responsibility / Due Date:</i>	<i>Reviewed by new Site Manager and SBM by May 2023 half term for approval at next trust meeting.</i>
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RAG	Finding	Recommendation	
Low Priority	<p>The following areas were not included within the Premises Management policy:</p> <ul style="list-style-type: none"> • The names of key people involved in premises management. • Reference to the Education Regulations 1999 under water supply section. • The load bearing structures section states that checks are not necessary as the building is a new build, however, how this area will be checked going forward should be considered now the building is 10 years old. • Risk Assessments – who does them, how often etc. • Evacuations – who is responsible, checks undertaken etc. • Reference to COSHH guidelines under cleaning section. • Reference to Workplace Regs 1992 under lighting, heating & ventilation section. • Gas Safety – who is responsible, checks on gas equipment. • Emergency lighting & intruder alarms – who is responsible, checks carried out & maintenance. • PAT testing – who is responsible, checks done. • Fixed electrical installations – who is responsible, checks carried out. 	The areas mentioned should be included in the school policy.	
Management Response:	<p><i>The majority of these areas are included in our Health and Safety Policy reviewed Sep 22. Premises Management Policy to be reviewed alongside the Health and Safety Policy Sep 22 to see if there are any gaps and to explore whether both policies should be combined going forward.</i></p>	Responsibility / Due Date:	<p><i>Reviewed by new Site Manager and SBM by May 2023 half term for approval at next trust meeting.</i></p>

RAG	Finding	Recommendation	
Medium Priority	The Health & Attendance Policy is reviewed by the Headteacher.	Any HR policies should be reviewed and approved by trustees and approval documented in the minutes of a meeting. The Headteacher as a member of staff could be subject to the content of the HR policies and should therefore not be reviewing/approving them.	
Management Response:	<i>New policy will be reviewed and approved by the resources committee on 6th March 2023. Document is available for resources committee members to view on GovernorHub.</i>	<i>Responsibility / Due Date:</i>	<i>Approved by Resources Committee on 6th March 2023</i>
Low Priority	<p>The policy is called “Health & Attendance” but only covers procedures for managing sickness absence.</p> <p>A health and attendance policy would normally focus on approaches to supporting good health and maximising attendance (e.g., wellbeing, mental health, flexible working) and procedures for managing all absences. It is noted that the Trust has a separate leave of absence policy for non-sickness related absences.</p>	It may be more appropriate for this policy to be called a “sickness absence management policy/procedure”.	
Management Response:	<i>New policy created through combination of current policies, model policies and feedback received through the audit.</i>	<i>Responsibility / Due Date:</i>	<i>Approved by Resources Committee on 6th March 2023</i>

RAG	Finding	Recommendation	
Low Priority	The Health & Attendance policy states that one trigger is “a continuous sickness absence of 10 working days or more”, whereas the Return-to-Work Meeting form references accumulated absences of ‘10 or more calendar days in a 6-month period’.	The accumulated absences of ‘10 or more calendar days in a 6-month period’ would seem the more appropriate trigger.	
Management Response:	<i>Trigger points aligned in the text of the policy (pg 15) and the Return to Work Meeting form (pg 23).</i>	<i>Responsibility / Due Date:</i>	<i>Approved by Resources Committee on 6th March 2023</i>
Low Priority	The Health & Attendance policy states that entitlement is in accordance with that operated by maintained schools - this is assumed to be the NJC Green Book Terms. The appendix indicates that for support staff, there is no entitlement to occupational sick pay for the first two days of absence. This is not consistent with Green Book Terms.	Either remove this condition or amend the policy section as follows: “Eligibility for occupational sick pay including duration and level of payment, is in accordance with the relevant conditions of service except where amended locally as set out in Appendix...”.	
Management Response:	<i>Reference to the school operating in accordance with framework for maintained schools (NJC Green Book) removed and specific sick pay entitlements outlined (pg 8)</i>	<i>Responsibility / Due Date:</i>	<i>Approved by Resources Committee on 6th March 2023</i>
Low Priority	The Health & Attendance policy refers to email reporting of absences.	While email reporting may be administratively more efficient, it is best practice for sickness absence to be reported verbally. This is proven to deter absences which are not wholly genuine.	
Management Response:	<i>Policy altered to reflect this recommendation (pg 6). If this change is agreed when the policy is approved, the staff handbook will need to be updated as well.</i>	<i>Responsibility / Due Date:</i>	<i>Approved by Resources Committee on 6th March 2023</i>

RAG	Finding	Recommendation	
Low Priority	The Health & Attendance policy states that self-certificates should be provided.	It is recommended that the policy states that self-certificates 'must', rather than 'should', be provided.	
Management Response:	<i>Policy altered to reflect this recommendations (pg 6).</i>	<i>Responsibility / Due Date:</i>	<i>Approved by Resources Committee on 6th March 2023</i>
Low Priority	<p>The Health & Attendance policy has no clear distinction between when informal and formal procedures will be used and whether formal procedures can be used without prior informal procedures, and if so in what circumstances.</p> <p>It is not clear who will conduct formal meetings and in particular who has the power to issue warnings and to dismiss.</p>	<p>It is recommended that Informal procedures are used once trigger points are met, and an Attendance Improvement Plan (AIP) put in place. If the AIP is not met or attendance subsequently deteriorates, this would then trigger formal procedures.</p> <p>Roles should be defined in line with the Trust's Scheme of Delegation.</p>	
Management Response:	<i>Policy altered to reflect this recommendation (pg 15-19).</i>	<i>Responsibility / Due Date:</i>	<i>Approved by Resources Committee on 6th March 2023</i>

EMERGING ISSUES

Acquiring and Converting a New School

An education whitepaper published in March 2022, set out the Government's ambition for all schools to be part of a multi-academy trust by 2030. Trusts will be looking to acquire further schools. Juniper can help with the due diligence for this process. Please contact carly.quickcrockford@junipereducation.org should you require any further information.

Wellbeing

It has been reported that staff stress levels are high, leading to many staff leaving the education sector altogether. Mitigating the impact of stress in the workforce should be implemented into everyday trust life by use of a wellbeing charter and strategies and structures that are put in place. Juniper can assess the general wellbeing of staff and provide suitable recommendations to help improve staff wellbeing and staff retention. Please contact carly.quickcrockford@junipereducation.org should you require any further information.

Cyber Security

Cyber security has continued to be a growing area of concern and risk over the past 18 months, with more people working remotely and an increased frequency of email hacking, phishing and malvertising. The July 2020 [governance update](#) advises that schools should include an assessment of cyber security within their risk registers, and the ESFA have produced further guidance and suggested questions that trustees can ask on the [National Cyber Security Centre website](#).

GDPR

An increasing number of schools are incurring unplanned costs, both direct and indirect, because of the increase in basic, and easily avoidable, data protection incidents and poorly managed school communications. This is combined with the increasing awareness of data subject of their right to bring a claim [on average in the order of £5,000 per claimant], directly against a school, leading to considerable potential risk to a school. Our GDPR associate has created a briefing video which helps you understand the changing risk to your school and employ some basic strategies and resources to help mitigate them and protect your school against unplanned costs. If you would like access to this briefing, please contact carly.quickcrockford@junipereducation.org

USEFUL LINKS

ACADEMY TRUST HANDBOOK

The Academy trust handbook 2022 is effective from September 2022. Trustees should ensure that they have read this document and noted any changes to ensure any new requirements are adhered to.

[ATH 2022 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

INTERNAL SCRUTINY IN ACADEMY TRUSTS

This good practice guide provides guidance for trustees, audit and risk committees, accounting officers, and chief financial officers (CFOs) in academy trusts.

[Internal scrutiny in academy trusts - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

Bespoke Reviews

If our portfolio of reviews does not include a particular area of interest or risk identified by the trust board, please contact us to discuss our bespoke review options.

Consulting

Juniper is available to provide consulting services in many areas of running a multi academy trust, from centralisation implementation and restructuring to expansion and attracting schools. Please contact us if you would like more information on our consulting work.

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Non-Financial Reviews Offered

PE & Sports Premium Review

Schools must use PE and sport premium funding to make additional and sustainable improvements to the quality of the PE, physical activity, and sport they provide. Our review will look at whether the funding is being used effectively to develop and add to your provision and examine your own evaluation of the impact using the 5 key indicators set out in the DfE guidance.

Pupil & Recovery Premium Review

Evidence shows that disadvantaged children generally face additional challenges in reaching their potential at school and often do not perform as well as other pupils. Pupil and recovery premium grants provide funding for schools to provide extra support for these pupils. Our review team will take on the role of 'critical friend', highlighting areas of strength around the school's approach to the use of the premiums, but also identifying what can be improved.

Safeguarding Internal Scrutiny Review

Keeping pupils safe is a core responsibility of schools and is rightly a key part of legislation and inspection. A safeguarding internal scrutiny review will assure settings of what they are doing well and provide recommendations to further improve practice and meet and exceed statutory expectations.

SEND Internal Scrutiny Review

Children and young people with special educational needs and disabilities should achieve well in their early years, at school and in college, and lead happy and fulfilled lives. Supporting SEND pupils safe is a core responsibility of schools and is rightly a key part of legislation and inspection. A SEND internal scrutiny review will assure settings of what they are doing well and provide recommendations to further improve practice and meet and exceed statutory expectations.

SEND Ofsted Audit

Though Ofsted doesn't give separate grades for a school's SEND provision, the evidence gathered is used to inform other judgements. Therefore, schools may find it useful to consider their provision in the same way as an inspection might.

We are pleased to offer an audit focussing on Ofsted criteria, in particular the requirements of paragraphs 360 to 364 of the inspection handbook.

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Sustainability Internal Scrutiny Review

Children and young people should have an understanding of the effects that human use of the world's resources has on them as individuals (including health, wellbeing, and financial wellbeing), the school community, their locality and the world. Our review team will take on the role of 'critical friend', highlighting areas of strength around the sustainability agenda, but also identifying what can be improved.

Teaching & Learning Review

Children and young people's education through the pandemic has suffered. Research is clear that some groups of pupils have fallen further behind than others. A key responsibility of schools is the need to prioritise the teaching of missed content so that pupils will be able to make sense of later work in the curriculum. This includes key knowledge, skills, vocabulary, concepts, and the links between concepts. Our review team will take on the role of 'critical friend', highlighting areas of strength around the school's approach to teaching for education, but also identifying what can be improved.