

# Internal Scrutiny Annual Report 2024 - 2025

Client: Hatfield Community Free School

Date: July 2025

**Juniper**  
Education

**Executive Summary**

Reviews undertaken: Non-Financial Internal Scrutiny (Attendance): Feb 2025 Non-Financial Internal Scrutiny (Governance): Jun 2025 Non-Financial Internal Scrutiny (Risk Management): May 2025	Review provided by: Juniper Education Juniper Education Juniper Education																												
<div style="text-align: center;"> <h3>Findings Summary</h3> <table border="1"> <caption>Findings Summary Data</caption> <thead> <tr> <th>Category</th> <th>Green</th> <th>Yellow</th> <th>Red</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Attendance</td> <td>8</td> <td>0</td> <td>0</td> <td>8</td> </tr> <tr> <td>Governance</td> <td>2</td> <td>7</td> <td>0</td> <td>9</td> </tr> <tr> <td>Risk Management</td> <td>0</td> <td>3</td> <td>1</td> <td>4</td> </tr> </tbody> </table> </div>	Category	Green	Yellow	Red	Total	Attendance	8	0	0	8	Governance	2	7	0	9	Risk Management	0	3	1	4	<table border="1"> <tr> <td colspan="2" data-bbox="1505 359 2098 491">Total number of recommendations: 21</td> </tr> <tr> <td data-bbox="1505 491 1890 630">High Priority</td> <td data-bbox="1890 491 2098 630">1</td> </tr> <tr> <td data-bbox="1505 630 1890 769">Medium Priority</td> <td data-bbox="1890 630 2098 769">10</td> </tr> <tr> <td data-bbox="1505 769 1890 901">Low Priority</td> <td data-bbox="1890 769 2098 901">10</td> </tr> </table>	Total number of recommendations: 21		High Priority	1	Medium Priority	10	Low Priority	10
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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 2024-25 period. It remains the responsibility: of management to manage the control environment to help identify potential fraud and prevent the likelihood of fraud occurring.

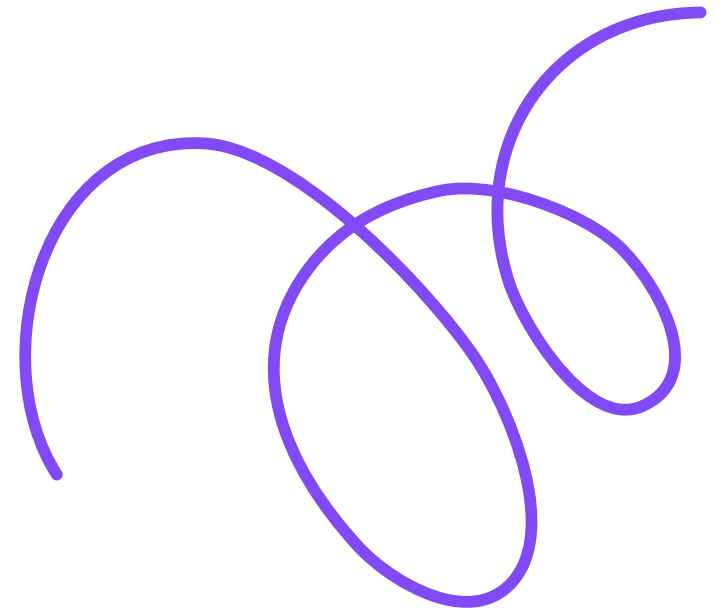
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## Introduction

The Academy trust handbook specifies “The trust must identify on a risk-basis (with reference to its risk register) the areas it will review each year.”

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 2024 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.



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## Scope

The relevant committee approved the below scope of work:

### Non-Financial Internal Scrutiny - Attendance

To identify if attendance procedures and policies are robust the following areas were covered:

- Attendance data analysis and how data is monitored
- Policies and procedures
- Communication and engagement
- Support systems
- Interventions
- Leadership and governance
- External Factors

### Non-Financial Internal Scrutiny - Governance

Key paperwork was considered including the minutes from meetings, School Development Plan, monitoring reports, reports from the principal and other supporting documentation from meeting packs. Information from the school's website was reviewed, including key policies and information about Trustees and their work. Meetings were held with the Trustees, the Clerk to the Trust Board and the Principal.

### Non-Financial Internal Scrutiny – Risk Management

This review of risk management arrangements has used the Government's Orange Book – Management of Risk in terms of approach and definitions, the Academies Financial Handbook and the ESFA's guide Academy Trust Risk Management as a reference for good practice.

The Academy Trust Handbook 2024 states that internal scrutiny should ensure that "all categories of risk are being adequately identified, reported and managed". The Trust must identify areas it will review each year using its risk register as a reference tool.

This review looked at the Trust's management of risk with the overall objective of assessing whether a) the identification process is effective in identifying those risks that should be prioritised for internal scrutiny and b) whether those risk are effectively managed or controlled. We have taken 'critical friend' approach. Highlighting both areas of strength in managing risks but also identifying what can be improved.

An initial desktop assessment of the current risk register, monitoring reports and relevant papers presented to the Finance committee as well as a review of the latest set of annual accounts. This was followed by interviews with the Headteacher who is also the accounting officer, the chair of the Trust Board and the school business manager.

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## Internal Scrutiny Report

### 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:

#### **Non-Financial Internal Scrutiny (Attendance):**

High Priority	Recommendations need urgent attention.
Medium Priority	Recommendations need attention.
Low Priority	Recommendations to offer best practice.

#### **Non-Financial Internal Scrutiny (Governance):**

High Priority	Trustees must review this area as a priority.
Medium Priority	Some improvements are needed to achieve exemplary practice.
Low Priority	This is highly effective practice in this area.

#### **Non-Financial Internal Scrutiny (Risk Management):**

High Priority	Trustees must review this recommendation as a priority.
Medium Priority	Internal controls should be strengthened to minimise risk.
Low Priority	Internal control could be strengthened in line with best practice, but little risk of material loss.

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Summary of Findings

RAG	Finding	Recommendation	
<b>Non-Financial Internal Scrutiny - Attendance</b>			
Low Priority	Introduce an element of supervision of decision making around cases.		
<i>Management Response:</i>		<i>Responsibility/ Due Date:</i>	
Low Priority	If a parent contacts school 3 times in a term reporting their child is absent with a high temperature contact home to discuss in more detail.		
<i>Management Response:</i>		<i>Responsibility/ Due Date:</i>	
Low Priority	Put in place a tracking process for 'I' codes, similar to the unauthorised absence tracker. This will help identify any emerging patterns, reasons, support required etc.		
<i>Management Response:</i>		<i>Responsibility/ Due Date:</i>	
Low Priority	Formalise asking teachers to report any attendance concerns particularly around I codes who may not get picked until end of the month.		
<i>Management Response:</i>		<i>Responsibility/ Due Date:</i>	
Low Priority	Add information around attendance on multiple platforms e.g. newsletter, social media etc		
<i>Management Response:</i>		<i>Responsibility/ Due Date:</i>	

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RAG	Finding	Recommendation	
Low Priority	Link attendance policies to other policies.		
<i>Management Response:</i>		<i>Responsibility/ Due Date:</i>	
Low Priority	Trustees to question the breakdown of authorised absence – what are the percentage breakdowns for illness, holidays? etc.		
<i>Management Response:</i>		<i>Responsibility/ Due Date:</i>	
Low Priority	Trustees to ask questions around attendance and safeguarding.		
<i>Management Response:</i>		<i>Responsibility/ Due Date:</i>	

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## Internal Scrutiny Report

RAG	Finding	Recommendation	
Non-Financial Internal Scrutiny - Governance			
Medium Priority	Governors/trustees ensure that the school has a clear vision and strategy, that resources are managed well and that leaders are held to account for the quality of education.	<p>The mission, vision and school values are published on the school's website.</p> <p>Work relating to progress towards the mission, vision and values is implicit rather than explicit. Placing a greater emphasis on this area and the impact of the schools and trustees' actions would move the current strong practice to exemplary practice.</p> <p>Leaders are held to account for the educational performance but deeper challenge is needed to provide trustees with a clear understanding of the impact of the school's work and the reasons for variations in performance, beyond contextual factors.</p>	
<i>Management Response:</i>		<i>Responsibility/ Due Date:</i>	
Medium Priority	Governors/trustees ensure that the school fulfils its statutory duties, for example under the Equality Act 2010, and other duties, for example in relation to the 'Prevent' duty and safeguarding.	<p>The school is committed to promoting the welfare and equality of all its staff, pupils and other members of the school community. To achieve this, the school has established the following equalities objectives:</p> <ul style="list-style-type: none"> <li>• Monitor changes to the curriculum to ensure they result in good outcomes for pupils in all vulnerable groups, and to review the curriculum considering new performance measures;</li> <li>• Implement effective strategies to support pupils in all vulnerable groups;</li> <li>• Improve the quality of support for pupils in all vulnerable groups in the classroom;</li> <li>• Continue to explore the use of new technologies to support pupils in all vulnerable groups in accessing their learning.</li> </ul> <p>The progress against objectives for Equality have not been monitored yet.</p> <p>Safeguarding and CP policy is current and meets requirements.</p>	

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RAG	Finding	Recommendation	
<i>Management Response:</i>		<i>Responsibility/ Due Date:</i>	
Low Priority	The responsible body knows its statutory duties and carries them out effectively.	The trust board schedule shows how statutory duties are completed. Equalities act requirements are completed.	
<i>Management Response:</i>		<i>Responsibility/ Due Date:</i>	
Low Priority	It supports leaders when they face challenges and monitors their wellbeing.	There is appropriate support for the principal. Regular meetings are held between the chair and principal. Workload is considered and this is informing approaches to reporting and the organisation of meetings in the autumn term.	
<i>Management Response:</i>		<i>Responsibility/ Due Date:</i>	
Medium Priority	Governors/trustees carry out their statutory core functions effectively to support the school to achieve its strategic aims and establish an inclusive culture and practices.	Statutory functions are being completed. However, a closer link between all of the trustees work and outcomes for children is needed so that the impact of decisions is known.	
<i>Management Response:</i>		<i>Responsibility/ Due Date:</i>	
Medium Priority	Governors/trustees support and challenge leaders appropriately. They hold leaders to account effectively, including for the school's support and provision for disadvantaged pupils and pupils with SEND.	There are variations between the depth of challenge across the range of the school's work (See the main report above). There are occasions where deeper challenge is needed, particularly in relation to the outcomes achieved by pupils, to ensure that actions in the SDP are having the intended impact.	
<i>Management Response:</i>		<i>Responsibility/ Due Date:</i>	
Medium Priority	Governors'/trustees' contribution to the school's work is consistently strong.	There are variations between the effectiveness of monitoring activities and the challenge provided in meetings.	

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RAG	Finding	Recommendation	
<i>Management Response:</i>		<i>Responsibility/ Due Date:</i>	
Medium Priority	They are highly effective at holding leaders to account.	See above	
<i>Management Response:</i>		<i>Responsibility/ Due Date:</i>	
Medium Priority	The responsible body is highly effective at supporting leaders' well-being.	This area has the potential to be RAGed green if the changes to meeting structures achieve the intended aims.	
<i>Management Response:</i>		<i>Responsibility/ Due Date:</i>	

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RAG	Finding	Recommendation
Non-Financial Internal Scrutiny – Risk Management		
Medium Priority	<p>All the main financial and compliance risks are correctly identified and ranked.</p> <p>However, having made this assessment with regard to high level risks there are a number of risk areas where we recommend further investigation.</p>	<ul style="list-style-type: none"> <li>- Reassess the categorisation of the strategic risks to make them high level. For example – should 1.1.10 ‘failure to produce management accounts’ be a strategic risk? We would suggest it needs to be included in financial risks.</li> <li>- In the finance section – there were many risks which could benefit from being merged into three risks around ‘failure to comply with the Academy Handbook’, ‘failure to protect against fraud’ and ‘running out of funds’. The main control for these risks is appropriate systems in place, the appointment of a CFO and Clerk of Trustees with the relevant qualifications backed up by effective performance management from the Accounting Officer and oversight from the Trust Board.</li> <li>- Add a strategic ‘reputational risk’ which would gather up the risks around poor educational performance, safeguarding incidents and staff / trustee behaviour. Measurement and control might be to think about what contingency measures the Free School would put in place if an incident occurred that was likely to damage the Trust’s reputation.</li> <li>- You may also want to consider including a strategic risk around developing a future plan for the Trust. There are risks around remaining as a ‘Single Academy Trust’ or developing your own ‘Multi-Academy Trust’. There are different risks around joining another ‘Multi Academy Trust’ which need to be taken into consideration. In the meantime, there is the obvious risk that in developing future plans senior leaders are detracted from the day-to-day running of the school and Trustees might want to think about how to control or what mitigations they may make available once work gets underway in developing the transition plan.</li> <li>- Include in strategic risks a specific risk around delivery of your most up to date school improvement plan. The register is light on education quality and would be something to review and include if only to ensure there is systematic monitoring.</li> </ul>

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RAG	Finding	Recommendation	
		The last set of annual accounts set out a list of the main risks which could form your strategic list alongside any high-level risks to delivery of the school development plan.	
<i>Management Response:</i>		<i>Responsibility/ Due Date:</i>	
Medium Priority	<p><b>Are the likelihood and impact scores realistic and accurate?</b></p> <p>The register doesn't differentiate between the score for likelihood or impact, so it was difficult to make an assessment around whether the scoring system used was realistic or accurate.</p> <p><b>Is the risk appetite of the Trust clearly articulated and applied consistently?</b></p> <p>We couldn't find any evidence that risk appetite has been discussed and used in assessment and treatment of risk. This will be important prism to use when considering the future of the Trust. A useful and simple approach to risk appetite is included in Academy Trust Risk Management guidance<sup>1</sup>.</p>	<p>The Trust needs to update the register and include a separate column for likelihood and impact and a total score. The descriptors set out in the first tab are exactly what I would expect to see.</p> <p>Develop a Risk Management policy which articulates the Trusts risk appetite. For example, given the school's status as a good school with healthy finances and academic standards – it may be that the Trust may look at increasing its risk appetite when considering strategies for the future.</p> <p>The policy should also set out how risks are escalated to the Board so they can be highlighted and addressed in a timely manner.</p>	
<i>Management Response:</i>		<i>Responsibility/ Due Date:</i>	

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RAG	Finding	Recommendation
<p>High Priority</p>	<p><b>Is it clear how risks are categorised? i.e. Tolerate, Treat, Transfer or Terminate?</b></p> <p>The risk register doesn't include any information about treatment categorisation. Including this information would help the Trust to focus on those issues which need attention.</p> <p>For example: Pupil numbers don't appear to be an issue so 'failure to recruit sufficient pupils' is a risk which the board can 'Tolerate'. On the other hand, failure to have a business continuity plan in place is deemed a medium risk and therefore you would want to 'Treat' that by producing the necessary plan.</p> <p><b>Assess – the preventative controls/mitigation processes and contingency plans.</b></p> <p>This is an area that needs more work. Controls need to be articulated more clearly and need to be activity focused. So, for example in relation to 2.1.8 we were not clear whether the controls are actually in place. This is probably one of the most serious risks facing academy trusts especially given the recent publicity around the M&amp;S and Coop cyber-attacks, so it is important that this risk is highlighted for senior leaders as well as trustees' attention.</p> <p>The risk register should also have a residual risk column where there is an assessment following the control or mitigation section that recalculates the residual 'Impact and Likelihood'. This final calculation should inform discussions around those risks that require the attention of the senior leadership team and the Board of Trustees.</p> <p>Finally – while evidence sources were mentioned in relation to some risks – for example in relation to 1.1.13 which sets out the risk around organisational failures – the narrative notes that Trust Board minutes are a source of assurance. However, in others this wasn't the case. In 1.1.1 on pupil</p>	<p>Update the risk register to incorporate:</p> <ul style="list-style-type: none"> <li>• Categorisation – Treat Tolerate Transfer or Terminate</li> <li>• Review controls – include active controls rather than the presence of policies.</li> <li>• Incorporate a 'residual risk' assessment which involves an evaluation of control measure and the subsequent impact and likelihood scores. Once the Risk Management systems are fully embedded this score should determine the risks that require the attention of SLT and the Board.</li> <li>• Review more regularly than once a year. Ideally the risk register should be included as an agenda item at SLT meetings at least once a month and at every 'risk and audit' meeting of the Trust Board.</li> </ul>

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RAG	Finding	Recommendation	
	<p>recruitment risks it might be expected that senior leaders would be deploying light touch monitoring of application data, demographic data from the local authority and numbers taking up a place after being offers go out to prospective parents. This would give the board assurance that the risk was correctly assessed as being low.</p> <p><b>Escalation – is there clarity around escalation of academy risks to the Trust board (especially relevant to reputational risks)?</b></p> <p>Risks are being escalated to Board discussions but weren't always documented in the risk register. For example, we noted that in the Headteachers report to the November 2024 board meeting the Head raised a concern around a decline in Key Stage 1 data, but we couldn't find a corresponding entry in the risk register.</p> <p>The school has an operational focused scheme of delegation. This could be expanded to include instructions around escalation from the Senior Leadership Team to the Board and perhaps a paragraph setting out the Trust's risk appetite.</p>		
	<i>Management Response:</i>		<i>Responsibility/ Due Date:</i>

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RAG	Finding	Recommendation	
<p>Medium Priority</p>	<p><b>Is the monitoring and reporting of risks effective?</b></p> <p>The business manager reports regularly to the senior leadership team on the main risks concerning operational matters – financial, IT and compliance issues. We could see for example, that the cyber security issues had been flagged with the Board following the Juniper Audit and that there was a clear audit trail through to the risk register.</p> <p>We couldn't see the same pattern with education risks although as previously noted - the Board had been alerted to the potential risks of a decline in educational outcomes through analysis of Key Stage 1 data. However, there was no corresponding introduction of an educational risk in the risk register which might have included a narrative around what management was doing to identify the cause of the decline and what action was being taken. This is a real missed opportunity to use risk management to track those issues which need the greatest attention.</p>	<p>Ensure that discussions and actions at Trust Board are incorporated into the risk register.</p> <p>Continue to include risk management and the latest register as a monthly standing item on the SLT meetings and at every Finance and Risk Committee going forward.</p>	
<p><i>Management Response:</i></p>		<p><i>Responsibility/ Due Date:</i></p>	

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## SECTOR WIDE 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](mailto: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](mailto: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](mailto:carly.quickcrockford@junipereducation.org)

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## USEFUL LINKS

### ACADEMY TRUST HANDBOOK

The Academy trust handbook 2024 is effective from September 2024. Trustees should ensure that they have read this document and noted any changes to ensure any new requirements are adhered to.

[Academy Trust Handbook 2024 \(publishing.service.gov.uk\)](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 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.

#### 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.

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