

# Griffin

## Chartered Accountants

### Internal Audit Report

#### Learning Academy Partnership (South West)

#### Governance & Regularity, Redundancy Payments and Risk Management

Visit date: 17<sup>th</sup> February 2026  
Issued by: Oliver Bright



Learning Academy Partnership (South West)

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# 1. Basis of the report

The Academy Trust Handbook requires that all Trusts have a process in place for checking its financial systems, controls, transactions and risks. One of the options laid out for fulfilling this requirement is for the Trust to appoint an internal auditor and it is in this capacity that we are making this report.

## Timetable of work

Griffin will carry out three visits to the Trust in order to fulfil these obligations, one in the Autumn Term, one in the Spring and one during the Summer Term.

Over the course of the year our work will cover the following key areas:

- Internal Control Framework
- Anti-Fraud Framework
- Payroll and HR
- Redundancy Payments
- Governance
- Recruitment and selection
- Budget Monitoring
- Income and Cash Receipts
- Risk Management
- Cyber Security

Our work will establish the existing systems that the Trust has in place, test whether these systems are being followed and make suggested improvements.

## Work completed February 2026

### Governance & Regularity

- Declaration of Interests
- Member's independence
- DBS checks
- Governance structure
- Staff members serving as trustees
- Related parties
- Gifts, hospitality and awards
- Information on the Academy's website
- Staff severance
- Board performance and effectiveness
- Finance committee compliance
- Scheme of Delegation
- Audit tender process
- Provision of information


### Redundancy Payments

- Review of redundancy policy
- Review of redundancy compliance
- Recalculation of redundancy payments

### Risk Management

- Review of risk register
- Trustee approval
- Consideration of high-risk areas
- Data protection and cyber security

## 2. Update on previous findings

Finding	Recommendation	Priority	Management Response
<b>Internal control</b>			
<p>1. <b>Service contracts</b></p> <p>The cleaning contract with Devon Norse has been on a rolling basis for a few years. It is therefore unclear whether value for money is still being achieved.</p>	<p>We recommend that large contracts go out for re-tender every three to five years to ensure that the Trust is obtaining value for money and that this is reflected in the Trust's finance policy.</p> <p><b>Update February 2026:</b>            Since this contract will not be renewed until September 2026, this point will remain until evidence of the tendering process and new contract has been viewed.</p>	<p style="text-align: center;"></p>	<p>Agreed. This contract will be reviewed and re-tendered during the current academic year. We will ensure that a new contract, with suitable and clearly defined end dates, is in place to commence on 1st September 2026.</p>

### 3. Work completed

	Work completed	Result	Conclusion
<b>Governance &amp; Regularity</b>			
1.	<p><b>Declaration of interests</b></p> <p>Ensure all trustees have declared any related party interests and that the details are published on the school website.</p> <p>Review Companies House directorships for any additional undeclared interests.</p>	<p>All nine current trustees have completed a declaration of interest at the beginning of the academic year. These interests have been reflected on the academy website.</p> <p>Companies House was reviewed against the declarations which identified three instances of directorships not being fully disclosed. One trustee had not included the name of their connected entity on their annual declaration, and a different trustee had omitted two directorships. There was a further instance of a trustee not declaring a recent directorship. However, since there have been no recent meeting minutes held for them to declare this additional Directorship, this is not an issue.</p> <p>Pecuniary interests were added to all full board meeting agendas, and no additional interests have been declared in the meetings held so far.</p>	<p>See recommendation in section 4.</p>

2.	<p><b>Member's independence</b></p> <p>Ensure that the majority of the members are independent of the Board of Trustees as per the DfE's recommendation in the ATH 2025.</p> <p>Identify if any new members have been appointed since 1st September 2025 and ensure the appropriate checks have been completed to gain confidence that they are able to take part in academy trust management.</p>	<p>All four members are not trustees so are independent from the Board of Trustees. With four members, the Trust adheres to section 1.3 of the ATH.</p> <p>The register of interest and GIAS confirms that no new members have been appointed this year.</p>	No issues to note.
3.	<p><b>Governance professional</b></p> <p>Ensured that the trust has a governance professional to support the board of trustees who is not a trustee, Principal or CEO.</p>	<p>The Trust has employed a Trust Governance Professional to support the board. They have a separate role within the Trust, and are not a trustee, principal or CEO.</p>	No issues to note
4.	<p><b>Staff members serving as trustees</b></p> <p>Ensure that no staff members, other than the Academy CEO/Head teacher, are on the Board of Trustees as per the DfE's should requirement in the ATH.</p>	<p>There are no staff trustees on the board, therefore the Trust is in line with the DfE's strong preference for no other employees to serve as trustees, as per section 1.23 of the ATH.</p>	No issues to note.

5.	<p><b>Related Party transactions</b></p> <p>Obtained evidence that any related party transactions have been properly authorised. If the amount of the transaction exceeds £2,500 obtain a copy of the statement of assurance required by the 'at cost' requirement set out in the ATH.</p>	<p>The Trust Operational Finance Lead confirmed that there have not been any related party transactions since 1<sup>st</sup> September 2025.</p>	<p>No issues to note.</p>
6.	<p><b>Gifts &amp; hospitality policy</b></p> <p>Ensured a policy is in place for the acceptance of gifts, hospitality, awards, prizes or any other benefit which might be seen to compromise their personal judgment or integrity and that staff been made aware if this policy.</p>	<p>There is a separate gifts and hospitality policy, which all staff are made aware of. This was last reviewed in the 2024 autumn term and is due for a further review in the 2026 autumn term. The information included within the policy is sufficient and clearly indicates defined boundaries on the nature and value of gifts that can be accepted.</p>	<p>No issues to note.</p>

7.	<p><b>Governance structure</b></p> <p>As per section 1.42 of the ATH, ensure the trust has published up-to-date details on its website of its governance structure.</p> <p>Ensure the Trust has spaces reserved for parent trustees as part of their governance structure.</p>	<p>The structure and detail of the trust's members, Board of Trustees, committees and local committees/governing bodies is clearly disclosed on Trusts website. This has been agreed to the information on Companies House and GIAS.</p> <p>Each local governing body has at least two parent governors, or a minimum of two spaces held for parent governors if the positions are currently vacant. Vacancies are published in school newsletters and actively advertised by the headteachers to encourage the roles to be filled.</p> <p>In the event there are less than two parent governors on the local governing board, the vacancies remain open for parents and can't be filled by other roles.</p>	No issues to note.
8.	<p><b>Submission of statutory accounts to the DfE</b></p> <p>Ensured the statutory accounts were submitted to the DfE by the deadline of 31 December and that the annual internal scrutiny report has been filed with the accounts.</p> <p>Ensured that the accounts have been filed with Companies House within nine months of the year end.</p>	<p>The 2024/25 accounts were submitted to the DfE on the 18<sup>th</sup> December 2025 ahead of the 31 December deadline and the 2023/24 accounts were filed with Companies House in May 2025: less than 9 months after the year end.</p>	No issues to note.

9.	<p><b>Information on the Academy's website</b></p> <p>Review of the academy's website, to ensure the following information is available:</p> <ul style="list-style-type: none"> <li>• Names and appointment date for members and the Board of Trustees, its committees and names of the chairs of each.</li> <li>• Pecuniary interests of members and trustees</li> <li>• Trustee attendance records at board and committee meetings over the last academic year.</li> <li>• A copy of the audited financial statements for the year ended 31 August 2025.</li> <li>• Names of any employees with benefits exceeding £100k, disclosed in £10k bandings.</li> <li>• Agenda, minutes and any documentation of board meetings.</li> </ul>	<p>Names, appointment dates, relevant interests from close family relationships, and business interests for its members and trustees are also present on the website. On the same document, information about each trustees attendance at Full Board, Audit, Risk and Resources and Education Standard Committee meetings for the 2024/25 academic year is listed.</p> <p>The Annual Accounts for the Year Ended 31 August 2025 have been published on the Trusts website.</p> <p>In accordance with section 2.29 in the ATH, employees whose benefits (including gross pay, employers pension contribution and termination payments), exceed £100k are listed in a separate document on the website for the most recent academic year (2024/25). These have been compared to annual pay information for the SLT and agrees to expectations.</p> <p>Whilst board minutes are not added to the website, they are available on request from the Governance Professional using a specific email address. This is disclosed on the Trusts website for public use.</p>	No issues to note.
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10.	<p><b>Staff severance payments</b></p> <p>For any staff severance payments, ensured they have been made in line with the requirements of the ATH.</p> <ul style="list-style-type: none"> <li>- Payment approved by trustees and evidenced by minutes.</li> <li>- The trustees considered whether the payment is in the best interest of the trust and whether it could be seen as a reward for poor performance.</li> </ul>	<p>There have not been any staff severance payments made during the 2025/26 financial year. We have completed separate testing on historic redundancies during this audit visit.</p>	<p>No issues to note.</p>
11.	<p><b>Board performance and effectiveness</b></p> <p>Ensure that there are appropriate procedures in place to evaluate the Board's performance and ensure the Trust has a governance professional in place.</p> <p>Confirm that the Board of Trustees has met at least termly.</p> <p>Obtain evidence that trustees and members have received and discussed the 'dear Accounting Officer' letter as per guidance in section 6.2 of the ATH.</p>	<p>An external review of the board performance is undertaken by an independent executive recruitment organisation. Reviews are completed every 3 years, with the last two reviews in December 2020 and November 2023. It was confirmed during this visit that the next review is due in the 2026/27 financial year.</p> <p>In the 2024/25 academic year, the board met five times, which is more than once a term. For the 2025/26 academic year, two board meetings have been held prior to this internal audit visit meaning they are on track to meet at least termly.</p> <p>Per March 2025 board minutes, the Accounting Officer letter has been received and read in accordance with ATH.</p>	<p>No issues to note.</p>

12.	<p><b>Provision of information</b></p> <p>As per section 2.46 of the ATH, the trust MUST notify the DfE via Get Information About Schools (GIAS) of changes in members, trustees, and local governors as well as chair of trustees, accounting officer and chief financial officer. The DfE need to be notified within 14 days of any changes.</p>	<p>The only movement on GIAS was the re-appointment of M Goodwin following the automatic resignation as her term was completed. Therefore, GIAS remains up-to-date for all active trustees and Members.</p>	<p>No issues to note.</p>
13.	<p><b>Audit and Risk Committee</b></p> <p>Where the Trust has income below £50million, the Audit and Risk Committee can be part of another Committee. Ensure the following:</p> <ul style="list-style-type: none"> <li>• The terms of reference for this committee include the requirements for the Finance Committee as per the ATH 2025.</li> <li>• The Chair of this committee is different to the Chair of Trustees.</li> <li>• That any staff in attendance (including the Headteacher) are not participating as member of the committee but are in attendance only.</li> </ul>	<p>The Trust has an Audit, Risk and Resources committee in place, the terms of reference for which are compliant with the requirements of the ATH and were reviewed at the start of the academic year (2025/26).</p> <p>The Chair of this committee is also a trustee but is different from the Chair of Trustees.</p> <p>Staff attending committee meetings are noted separately as being 'in attendance' rather than an 'attendee' in line with section 3.11 of the ATH.</p>	<p>No issues to note.</p>

14.	<p><b>DBS checks</b></p> <p>Ensured that the trust has obtained Enhanced DBS Checks for all staff and supply staff and Enhanced Criminal Record Certificate for anyone involved in governance.</p>	<p>Enhanced DBS checks have been obtained for all staff and trustees tested. Evidence of Section 128 checks were included as part of DBS checks, so remain compliant.</p>	<p>No issues to note.</p>
15.	<p><b>Scheme of Delegation</b></p> <p>Obtain a copy of the scheme of delegation and ensure it is appropriate and there is evidence of its last review.</p>	<p>This has been discussed and reviewed by the Audit, Risk and Resources committee in June 2025.</p>	<p>No issues to note.</p>
16.	<p><b>Audit Tender procedures</b></p> <p>As per the ATH section 4.5, the Trust should retender their external audit at least every five years. Any details of a previous tender should also be retained for best practice.</p>	<p>The academy last retendered in July 2024. Five firms were invited to tender, with relevant information provided by the firm and evidence of the decision-making process kept securely on file.</p> <p>The academy retenders every three years, so is due to retender again in 2027. This will be less than five years after the previous retender, in line with ATH guidance.</p>	<p>No issues to note.</p>

**Redundancy Payments**

17.	<p><b>Redundancy policy</b></p> <p>Obtained and analysed the redundancy policy to assess whether it is up-to-date and includes all appropriate sections to be compliant with employment law.</p>	<p>The redundancy policy contains the key information and any procedural guidance we would expect, including the circumstances in which redundancies may arise and the recommended processes to be followed if redundancies are required.</p>	<p>No issues to note.</p>
18.	<p><b>Review of redundancy compliance</b></p> <p>Select a sample of redundancy payments made to assess whether the redundancies were supported by the appropriate documentation and approval in line with the Trust's redundancy policy and to be compliant with employment law.</p>	<p>The redundancy payments made were in relation to staff restructuring. All redundancy payments tested were supported by appropriate documentation and have been approved in line the Trusts' redundancy policy.</p>	<p>No issues to note.</p>
19.	<p><b>Accuracy of redundancy payments</b></p> <p>Sampled ten individuals who were at risk of redundancy and reviewed the accuracy of the redundancy calculations through independent recalculation of each redundancy entitlement.</p>	<p>From the ten individuals selected, all redundancy and PILON calculations agreed to supporting payroll documentation, confirming the basis of these redundancy calculations was correct.</p>	<p>No issues to note.</p>


## Risk Management

<p>20.</p>	<p><b>Review of risk register</b></p> <p>Obtained a copy of the Trusts' risk register, and analysed the range of risks included, considering both financial and non-financial risks.</p> <p>Checked that the risk register has been reviewed for changes on at least an annual basis and ensured that reasonable controls have been implemented to mitigate high and medium level risks.</p> <p>Ensured that the risk register has been tailored to the characteristics of the Trust and is not just a generic template. This will help the Trust to effectively manage their unique risk profile.</p>	<p>The Trust maintains their risk register on iAM with registers being held at Trust level and for each individual school. This provides a consistent framework for identifying and monitoring the risks across the Trust.</p> <p>These risk registers set out a broad range of financial and non-financial risks that are appropriate for the organisation's scale and operating environment. These encompass Governance, Strategic and Operational areas. Each entry also outlines the actions already taken to manage exposure, together with the controls designed to mitigate the identified risks.</p> <p>Risks are assessed using both likelihood and impact, producing an overall numerical risk score. This is supplemented with an RAG classification to support clear and intuitive interpretation.</p> <p>For every risk, the register also records the planned review date and identifies the staff member responsible for overseeing and monitoring that risk</p>	<p>The risk register is regularly reviewed at a high level. However, the third-party software shows that there are a number of risks that are overdue a review.</p> <p>Following a discussion with the Trust Operation Finance lead, this is not a true reflection of the status of these risks.</p> <p>Therefore, there is sufficient evidence of risks being monitored appropriately, but the software should also be updated regularly by both the staff assigned to each risk, and at board level, to fully monitor the status and accuracy of each risk.</p>
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21.	<p><b>Trustee approval</b></p> <p>Ensured that the risk register has been appropriately approved by the Board of Trustees within the last 12 months.</p>	<p>The Board of Trustees formally reviewed the Trust Risk Register during their meeting on 25th September 2025, and trustee input was received.</p>	<p>No issues identified</p>
22.	<p><b>Consideration of high-risk areas</b></p> <p>Ensured that the Board of Trustees have discussed high-risk areas identified on the risk register, and that these are being continually monitored where they are areas that cannot be tested by the internal audit.</p>	<p>High risks are regularly discussed in both the full board and audit, risk, and resources committee meetings, ensuring they receive appropriate oversight.</p> <p>Significant financial risks undergo internal audit testing three times each academic year to confirm that the controls in place remain effective. Wherever possible, non-financial risks are also subject to external review. As such, the trust intends to commission a cyber-security assessment within the current academic year.</p>	<p>No issues identified</p>

<p>23.</p>	<p><b>Cyber security</b></p> <p>Ensured the Trust has procedures in place to mitigate and protect against the risks of cyber security and cybercrime.</p> <p>Ensured that all staff have completed the free cyber security training and there is a record of who has completed this.</p>	<p>There are a minimal number of IT risks included on the risk register. The Trust have a separate Digital Standards Review, that has recently incorporated RAG ratings. Going forward this document will be reviewed on an annual basis by the Resources Committee, who will pass on their recommendation for approval onto the Board of Trustees.</p> <p>Online cyber security training must be completed in the Autumn Term by all staff that work with IT equipment. Automated reminders will be sent before deadlines, and a member of the central team will hold a list of staff who are yet to complete the required elements.</p> <p>This mandatory training was due to be implemented from September 2025. However, due to third-party software issues, there was a delay in the roll-out of this training.</p>	<p>Due to issues with the implementation of the mandatory training, this has yet to be completed by staff. Therefore, this will be reviewed again in the summer to ensure the training has been made mandatory in line with Trust policy.</p>
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## 4. Recommendations

Finding	Recommendation	Priority	Management Response
<b>Internal control</b>			
<p>1. <b>Declaration of interests</b></p> <p>There were two directorships missing for H Burge's, which were identified from our review of Companies House.</p> <p>The details of M Graves' directorship was also missing from the register of interest on the Trust website.</p>	<p>We recommend that all declaration of interest forms are reviewed/cross checked against Companies House. We would recommend that Trustees complete a declaration of interest form at the beginning of each academic year and that they are given the opportunity to declare any updates at each board meeting throughout the year.</p>	<p style="text-align: center;"></p>	<p>Management has reviewed the observations in respect of Director declarations and provides the following clarifications:</p> <ul style="list-style-type: none"> <li>• The interests relating to Cathedral (Mark) and Windle (Helen) were not declared as both entries are dormant and not actively trading</li> <li>• In relation to Ann, her interest was not included on the signed declaration form dated September 2025, as she was not a director of Elevate at that time</li> </ul>

### Report Priority Rating

	Fundamental findings that need the immediate attention of management
	Important findings that require management attention, but are not fundamental in nature
	Minor issues that can be improved or administrative errors that require correcting
	The issue has been resolved

