

Final Internal Audit Report

Christ Church C of E School

October 2024

Distribution: Headteacher
Chair of Governors
School Business Manger
Director Education
Corporate Director of Children, Young People and Education
Head of Finance
Director of Finance (Deputy S151 Officer)
Corporate Director of Resources and S151 Officer

Assurance Level	Recommendations	
Limited	Priority 1	2
	Priority 2	5
	Priority 3	8

Confidentiality and Disclosure Clause

This report ("Report") was prepared by Forvis Mazars LLP at the request of London Borough of Croydon and terms for the preparation and scope of the Report have been agreed with them. The matters raised in this Report are only those which came to our attention during our internal audit work. Whilst every care has been taken to ensure that the information provided in this Report is as accurate as possible, Internal Audit have only been able to base findings on the information and documentation provided and consequently no complete guarantee can be given that this Report is necessarily a comprehensive statement of all the weaknesses that exist, or of all the improvements that may be required.

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Please refer to the Statement of Responsibility in Appendix 3 of this report for further information about responsibilities, limitations and confidentiality.

Executive Summary

1. Introduction	3
2. Key Issues	4

Detailed Report

3. Actions and Key Findings/Rationale	5
4. Priority 3 issues	19

Appendices

1. Terms of Reference
2. Definitions for Audit Opinions and Recommendations
3. Statement of Responsibility

1. INTRODUCTION & BACKGROUND

- 1.1. This audit was undertaken as part of the Internal Audit Plan for 2023/24, as agreed by the Council's Audit Committee.
- 1.2. A hybrid approach of conducting this audit was adopted, with this audit initially being conducted remotely.
- 1.3. For the 2023/2024 academic year, Christ Church C of E School held 410 pupils and an expenditure budget of £2,808,656. The School's last Ofsted Inspection was completed 23 March 2024 where it achieved a 'Good' rating.

2. Key Issues

Priority 1 Issues

The School maintained a Single Central Record which recorded the DBS and Barred List Checks completed for both Governors and staff. Examination of the Single Central Record identified:

- For seven staff members, their corresponding DBS check had not been reviewed within three years of the date of audit (March 2024), and
- For one Governor, the School were unable to evidence a DBS application being submitted within 21 days of appointment their appointment (**Issue 2**).

The School Business Manager confirmed that at the time of audit (March 2024), an Information Asset Register was not in place. The School Business Manager advised that there were plans to implement an Information Asset Register, however this was not completed at the time of the audit (**Issue 6**).

Priority 2 Issues

The School Business Manager confirmed that the School were unable to evidence an approved monthly budget monitoring report for each of the previous three months from the point of audit (December 2023, January 2024 and February 2024) (**Issue 1**).

The Pay Committee meeting on 1 November 2023 was not formally minuted and therefore did not evidence that the Executive Headteachers pay was approved by governors. (**Issue 3**)

Examination of financial records held for a sample of 15 transactions selected from the School's Bank Statement for the period 28 February 2023 to 29 February 2024 identified two transactions where a goods/services received check was not evidenced as having been completed by an individual independent from the initial official purchase order approval. (**Issue 4**).

Examination of financial records held for a sample of 15 transactions selected from the School's Bank Statement during the period 28 February 2023 to 29 February 2024 identified one transaction, which was a payment to a self-employed individual, where the School evidenced a completed IR35 check. However, this was completed on 4 March 2024, which was after the payment date of 4 September 2023 (£308.00) (**Issue 5**).

Examination of the Christ Church C of E school's Governors Fund most recent audited statement confirmed that this was for the period 1 January 2022 to 31 December 2022, with the audit report being dated November 2023. However, an audit of the subsequent period 1 January 2023 to 31 December 2023 had not yet been completed at the time of the audit (February 2024).

The School advised that the Finance and Personnel Committee had raised the need for an audit to be completed by audit by April 2024 (**Issue 7**).

The Priority 3 recommendation(s) is/are included under item 4 below.

3. Actions and Key Findings/Rationale

Control Area 2: Budget Planning, Monitoring and Reporting

Priority	Recommendation 1	Detailed Finding/Rationale		
2	The School should ensure that a monthly budget monitoring report is generated through the financial management system and presented to the Headteacher for review. This review should be documented to evidence compliance.	<p>Expected Control</p> <p>The School’s Finance Policy (2023) stated that, “<i>the School Business Manager/Admin Officers prepare monthly reports supported by the Schools’ computerised accounting system of the actual performance against budget with explanations of the main variances</i>”. These monthly budgeting monitoring reports should be evidenced as reviewed and approved by the Headteacher.</p> <p>Finding/Issue</p> <p>The School Business Manager confirmed that the School were unable to evidence an approved monthly budget monitoring report for each of the three months prior to the date of audit (i.e. December 2023, January 2024 and February 2024).</p> <p>Risk</p> <p>Where budget reports are not regularly monitored, there is a risk that the School deviates from the approved budget plan, resulting in under/ overspending and a failure to satisfy certain resourcing requirements.</p>		
Management Response		Agreed/Disagreed	Responsible Officer	Deadline
Since the audit the Finance Advisor has been emailing monthly reports to both		Agreed	Mrs Sheeja Joy (SBM)	July 2024

the Headteacher and SBM. Previously these were emailed to the SBM and saved in a shared folder – which the Headteacher would check. Monthly reports are now signed by the Headteacher too.

Control Area 3: Payroll

Priority	Recommendation 2	Detailed Finding/Rationale
1	<p>The School should ensure that staff DBS checks are renewed within three years of the previous check to confirm that information received remains accurate.</p> <p>The School should ensure that a DBS application is submitted within 21 days of the Governor’s appointment, with this documented to evidence compliance.</p>	<p>Expected Control</p> <p>Disclosure and Barring Service (DBS) checks are only accurate on the day issued, becoming out of date immediately thereafter. Unless the ‘DBS Update Service’ is in place, all DBS checks (for staff and governors) should be periodically renewed. In line with Council Policy, DBS checks should be renewed every three years.</p> <p>The School Governance (Constitution and Federations) (England) (Amendment) Regulations 2016 states that, “<i>where a Governor is elected or appointed on or after 1st April 2016 and does not hold an enhanced criminal record certificate, the Governing Body must apply for such a certificate in respect of that Governor with 21 days after his or her appointment or election.</i>”</p> <p>Finding/Issue</p> <p>The School maintained a Single Central Record which recorded the DBS and Barred List Checks completed for both Governors and staff. Examination of the Single Central Record identified that:</p> <ul style="list-style-type: none"> • For seven staff members, their corresponding DBS check had not been reviewed within three years of the date of audit (March 2024); and • For one Governor, the School could not evidence that a DBS application had been submitted within 21 days of appointment. <p>Risk</p>

		Where DBS checks are not applied for or renewed in within three years, there is a risk that the School will not be aware of disqualifying changes to an individual's circumstances which may result in children being placed at risk.		
Management Response	Agreed/Disagreed	Responsible Officer	Deadline	
<p>Due to the circumstances the DBS application of the governor was delayed – we will ensure this does not happen going forward.</p> <p>For staff DBS checks, while the school agrees with the accuracy of the findings detailed above, we have checked our processes with Southwark Diocese. DBS checks are reviewed every three years however this is not BEFORE 3 years but around the 3-year mark. This is for staff who have not changed roles and there is no break in service.</p>	Agreed	Mrs Sheeja Joy (SBM)	July 2024	

Priority	Recommendation 3	Detailed Finding/Rationale		
2	<p>The School should ensure that Governing Body meeting minutes are minuted by a clerk or a designated member of staff. Minutes should be returned to the Governing Body at the subsequent meeting to be approved and signed by the Chair. Once approved, meeting minutes should be retained by the School to evidence compliance.</p> <p>The School should ensure that increases to the Executive Headteacher’s pay are scrutinised within the Pay Committee, with this formally documented within meeting minutes to evidence compliance.</p>	<p>Expected Control</p> <p>The School Governance (Roles, Procedures and Allowances) (England) Regulations 2013 states that “<i>minutes of the proceedings of a meeting of a committee must be drawn up by the clerk to the committee or the person acting as the clerk for the purposes of the meeting; and must be signed (subject to the approval of the committee) by the chair at the next meeting of the committee.</i>”</p> <p>The School’s Appraisal and Pay Policy (2021) states that the Governor’s Pay Committee must act as the decision maker for any pay decision regarding the Executive Headteacher. To evidence compliance with the finance policy, decisions should be formally documented within meeting minutes.</p> <p>Issue/Finding</p> <p>Examination of the Governing Body meeting minutes from between February 2023 to February 2024 established that the Pay Committee meeting on 1 November 2023 was not formally minuted. Therefore, Internal Audit were unable to confirm that an increase in Executive Headteacher pay had been ratified by governors.</p> <p>Risk</p> <p>Where Committee meetings are not minuted appropriately, with these then presented to the Governing at the subsequent meeting for approval, there is a risk that the School will be unable to evidence that sufficient scrutiny and oversight, or School governance has been completed.</p>		
Management Response		Agreed/Disagreed	Responsible Officer	Deadline

<p>The pay committee were presented with a table of current staff and new pay scales, this is discussed and approved, and the chair of the committee email the SBM to amend payroll. Going forward we will ensure that this is also minuted.</p>	<p>Agreed</p>	<p>Mr Gramham Duncan - Chair of Finance and Personnel and committee</p>	<p>July 2024</p>
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Control Area 4: Procurement

Priority	Recommendation 4	Detailed Finding/Rationale		
2	The School should ensure that a goods/services received check is completed for each purchase by an officer independent to the approval of the corresponding official purchase order and invoice. The goods/services check should be recorded to evidence compliance.	<p>Expected Control</p> <p>The Croydon Scheme for Financing Schools (2022), states that schools should demonstrate sound systems of financial controls, including appropriate provisions for the division of duties. Officers checking goods received by the School should be independent of the person responsible for the administration of orders and payments.</p> <p>Finding/Issue</p> <p>Examination of financial records held for a sample of 15 transactions selected from the School's Bank Statement for the period 28 February 2023 to 29 February 2024 identified two transactions where a goods/services received check was not evidenced as completed by an individual independent from the initial official purchase order approval (£630.00, and £2,790.00).</p> <p>Risk</p> <p>Where segregation of duties has not been evidenced for purchases, there is a risk that the School has not demonstrated sufficiently robust financial controls or holds sufficient oversight of committed funds. This in turn could lead to the School undertaking inappropriate expenditure that is not for the benefit of the School.</p>		
Management Response		Agreed/Disagreed	Responsible Officer	Deadline
For £2790 – this was a WONDE food vouchers order. PO was raised by S Joy (SBM) and approved by J Richardson (HT). Goods received was signed by S		Agreed	Mrs Sheeja Joy (SBM)	July 2024

Joy and J Richardson Remittance was signed by S Joy and A Hudson (DHT), who is independent.

For £630 – this was for the attendance officer. PO was raised by S Joy (SBM) and approved by J Richardson (HT). Goods received was signed by S Joy and J Richardson as they both work with the attendance officer and can confirm that she worked on those days. Remittance was signed by S Joy and A Hudson (DHT), who is independent.

We are a small school and there are a limited number of people available to sign and approve orders. We try to segregate duties where possible.

Agreed

Mrs Sheeja Joy (SBM)

July 2024

Priority	Recommendation 5	Detailed Finding/Rationale		
2	<p>The School should ensure the tax status of an individual is determined prior to making any payments. The check can be made through this link: https://www.gov.uk/guidance/check-employment-status-for-tax</p> <p>A copy of the completed check should be retained by the School to evidence compliance.</p>	<p>Expected Control</p> <p>An IR35 tool is included on the HMRC website, which can be used to determine an individual’s employment status. Guidance on the website further details that, “<i>There must be a contract in place to see whether the engagement is classed as employment or self-employment. The tool assumes there will be one in place</i>” and that, “<i>HMRC will stand by the result you get from this tool. Warning: This would not be the case if the information you have provided was checked and found to be inaccurate.</i>”</p> <p>Finding/Issue</p> <p>Examination of the records held for a sample of 15 transactions selected from the School’s Bank Statement for the period 28 February 2023 to 29 February 2024 identified one transaction, which was a payment to a self-employed individual, where the School evidenced a completed IR35 check. However, this check was completed on 4 March 2024, which was 6 months after the payment date of 4 September 2023 (£308.00).</p> <p>Risk</p> <p>Where payments are made to individuals who are deemed to be employees by HMRC, without NI and PAYE deductions being made, there is a risk that the School will be held liable for the PAYE and NI for these payments and may be fined.</p>		
Management Response		Agreed/Disagreed	Responsible Officer	Deadline

IR35's have been completed for all self-employed individuals.	Agreed	Mrs Sheeja Joy (SBM)	July 2024
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Control Area 6: Information Governance

Priority	Recommendation 6	Detailed Finding/Rationale		
1	<p>The School should ensure that an Information Asset Register is created and implemented, which outlines the following information:</p> <ul style="list-style-type: none"> • Types of information held by the School; • What information is used for; • Where information is stored; • Who information is shared with; • How long information is retained; and • How information is protected. 	<p>Expected Control</p> <p>The Information Commissioner’s Office (ICO) website states that an organisation should, “<i>have an asset register those records assets, systems and applications used for processing or storing personal data across the organisation.</i>”</p> <p>The information asset register is key to helping ensure compliance with the Data Protection Act 2018 and UK GDPR.</p> <p>Finding/Issue</p> <p>The School Business Manager confirmed that at the time of audit (February 2024), an Information Asset Register was not in place. The School Business Manager advised that there were plans to implement an Information Asset Register, however this had not yet been completed at the time of the audit.</p> <p>Risk</p> <p>Where an Information Asset Register is not in place, the School will not be able to demonstrate compliance with the requirements of the Data Protection Act 2018 and UK GDPR. Should a data breach occur, the School will have a lack of defence to mitigate any fines levied by the ICO. It may also be, as a consequence, audited by the ICO.</p>		
Management Response		Agreed/Disagreed	Responsible Officer	Deadline

School has a new DPO in place who, once training has been completed, will write an IAR	Agreed	Mrs Richardson and new DPO (Headteacher)	December 2024
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Control Area 8: School Fund Accounting

Priority	Recommendation 7	Detailed Finding/Rationale		
2	The School should ensure that School's Governors Fund is subject to an annual audit in a timely manner, with this presented to the Governing Body for oversight and scrutiny. This should be documented within meeting minutes to evidence compliance.	<p>Expected Control</p> <p>The School's Finance Policy (2023) stated <i>"The Governing Body will appoint an auditor who is independent of the School and not a member of the Governing Body should the income exceed £10,000 per year and this becomes necessary. The accounts will be independently examined by either an independent Governor, member of staff or parent to demonstrate openness on an annual basis."</i></p> <p>Finding/Issue</p> <p>Examination of the Christ Church C of E School's Governors Fund most recently audited statement confirmed that this was for the period 1 January 2022 to 31 December 2022, with the audit report dated November 2023. However, an audit of the period 1 January 2023 to 31 December 2023 had not yet been completed at the time of the audit (March 2024).</p> <p>The School advised that the Finance and Personnel Committee had raised the need for an audit to be completed by audit by April 2024.</p> <p>Risk</p> <p>Where the School's Governors Fund is not audited annually, there is a risk that the fund may be misused while operating alongside public funds.</p>		
Management Response		Agreed/Disagreed	Responsible Officer	Deadline
An independent examiner will check the accounts but since the funds do not exceed the recommended amount for		Agreed	Chair of Finance and Personnel and committee	November 2024

auditing (£10,000) this will not be an official audit as it is not legally required.

(Mr Graham Duncan)

4. Priority 3 Issues

Recommendation	Findings
<p><u>Control Area 2: Budget Planning, Monitoring and Reporting</u></p> <p>The School should ensure that the annual benchmarking report completed identified areas or targets for improvement that should be brought to the attention of the Governing Body.</p> <p><u>School’s response</u></p> <p>Agreed.</p> <p>Benchmarking is discussed at Finance committee, but this was not minuted in detail. Going forward minutes will include all details discussed and suggestions for improvement.</p> <p><u>Responsible Officer:</u> Mrs Sheeja Joy (SBM)</p> <p><u>Deadline:</u> July 2024</p>	<p>Expected Control</p> <p>The Schools’ Financial Value Standard question 18 asks “<i>Does the School benchmark its income and expenditure and investigate further where any category appears to be out of line?</i>”</p> <p>The School benchmarking report should incorporate areas for improvement or related targets.</p> <p>Issue/Finding</p> <p>In response to the SFVS question 18, the School stated that the benchmarking exercise was undertaken by the Personnel and Finance Committee annually. Examination of the School’s most recent benchmarking report, for the financial year 2022/2023, confirmed that areas for improvement or targets to help achieve improvement were not identified.</p> <p>Risk</p> <p>Where the School does not set targets for improving expenditure in categories of spend identified by the benchmarking exercise as appearing out of line, there is a risk that the School fails to demonstrate value for money.</p>

Control Area 2: Budget Planning, Monitoring and Reporting

The School should ensure that the annual budget is presented to the full Governing Body for approval prior to the 1 May Council submission deadline, with this documented within meeting minutes to evidence compliance.

School's response

Agreed.

While the school agrees with the accuracy of the finding detailed, the school disagrees with the need for the current process to be amended. The initial budget was informally discussed via email with the Finance committee in Feb 2023 before the final version being presented and checked/scrutinised by the Finance committee on the 27 March 2023. This was presented to the full governing body along with notes from the Chair of the Finance committee summarising the changes for 2023/24 on the 25 May. There is no other way to complete this considering the time limitations with Easter holidays being in the middle of year end/budget setting. Although the final version is not signed prior to submission the

Expected control.

The School's annual budget should be reviewed, scrutinised and approved by the Full Governing Body prior to submission to the Council on the 1 May. This should be formally documented within meeting minutes to evidence compliance.

Issue/Finding

Examination of the Governing Body meeting minutes between February 2023 and February 2024 confirmed that the draft annual budget was approved by the Personnel and Finance Committees prior to the 1 May submission; however, the Full Governing Body approved the budget on 25 May 2023.

Risk

Where the School's annual budget is not scrutinised and approved by the full Governing Body prior to the Council's submission deadline, there is a risk that the School is non-compliant with the Croydon Scheme for Financing Schools.

minutes and meeting documents clearly evidence that the budget was discussed in detail by both the Finance committee and FGB and financial reports are presented to FGB at all their meetings.

Responsible Officer: Mr Graham Duncan - Chair of Finance and Personnel and committee

Deadline: July 2024

Control Area 3: Staffing/Payroll

The School should ensure that the Executive Headteacher formally acknowledges the agreed leaving date once a resignation letter has been received.

School's response

Agreed.

Going forward will include the leaving date in acknowledgement letters to staff who are leaving.

Responsible Officer: Mrs Jo Richardson (Headteacher)

Deadline: July 2024

Expected Control

The School should have an appropriate framework in place to ensure that all staff terminations are necessary and processed in line with the relevant policies and procedures. The Executive Headteacher should acknowledge resignations to confirm the leaving date and prevent misunderstandings.

Finding/Issue

The leavers report generated from the School's Arbor management system for the period 28 February 2023 to 29 February 2024 identified six leavers. Examination of staff records for a sample of three of these leavers identified that for two individuals, a leaving date was not outlined and agreed in the Executive Headteacher's response to the corresponding resignation letters.

Risk

Where the Executive Headteacher's acknowledgement of resignation and confirmation of leaving date is not provided for employees terminating employment with the School, there is a risk that the actual leaving dates may

	be misunderstood. This in turn could lead to overpayments for work not that has not been completed by leavers.
<p><u>Control Area 3: Staffing/Payroll</u></p> <p>The School should ensure that information entered through the Arbor management system aligns with information recorded through the new starter’s offer of employment.</p> <p>The School should consider undertaking spot checks of information entered, to ensure that data remains accurate.</p> <p><u>School’s response</u></p> <p>Agreed.</p> <p>New starters are recorded accurately on payroll; ARBOR (MIS) is not used for payroll. Going forward this will be checked so that both systems have matching dates</p> <p><u>Responsible Officer:</u> Mrs Sheeja Joy (SBM)</p> <p><u>Deadline:</u> July 2024</p>	<p>Expected Control</p> <p>The School’s Finance Policy (2023) states that <i>“the School Business Manager/Admin Officers maintain a list of staff employed by the relevant school which is updated promptly to reflect starters and leavers.”</i></p> <p>Issue/Finding</p> <p>Examination of the Starters report generated from the Arbor management system for the period 28 February 2023 to 29 February 2024 identified five starters. Examination of staff records for a sample of three starters identified that for one individual, the start date was listed as 24 November 2023. However, examination of the corresponding Offer of Employment letter confirmed that their official start date was 1 January 2024.</p> <p>Risk</p> <p>Where new starter dates and subsequent payroll data are not recorded correctly, there is a risk of staff being paid inappropriately or inaccurately.</p>
<u>Control Area 3: Staffing/Payroll</u>	Expected Control

The School should ensure the Payroll listing provided to the Strictly Education payroll provider is updated to reflect the current Staff listing, with former employees removed in a timely manner.

School’s response

Agreed.

This is the same as above – the two systems do not match, and payroll is accurate. Going forward this will be checked so that both systems have matching dates. The member of staff mentioned left as a class teacher but remained on ARBOR as she wanted to work as a supply teacher.

Responsible Officer: Mrs Sheeja Joy (SBM)

Deadline: July 2024

The School’s Finance Policy (2023) states that, *“The School Business Manager/Admin Officers maintain a list of staff employed by the relevant school which is updated promptly to reflect starters and leavers.”*

Issue/Finding

Examination of the School’s Payroll listing from their provider Strictly Education and a report listing their current staff from their HR system Arbor established that 2 employees who were on the payroll listing did not appear on the list of current staff. The School Business Manager (SBM) advised that for one individual, who was listed on the payroll twice under different surnames was an ad hoc supply teacher. Examination of the payroll reports from November 2023, December 2023 and January 2024 confirmed the individual had not been paid twice.

In addition, Internal Audit confirmed that that there was one former employee who was listed on Arbor as a current employee who had left the School on 1 November 2023. However, examination of the payroll reports from November 2023, December 2023 and January 2024 confirmed that they were not overpaid.

Risk

Where payroll data is not set up appropriately, there is a risk of staff being paid inappropriately or inaccurately. This in turn could lead to overpayments to former School employees and the financial mismanagement of public funds.

Control Area 4: Procurement

Expected Control

The School should ensure that an official purchase order is raised through the School's financial management system and approved by the Executive Headteacher, or appropriate delegated authority, prior to the commitment of funds with the supplier.

School's response

Agreed.

The transaction is for the attendance officer, this is budgeted expenditure. The purchase order was dated 23 June and invoice date is 29 June, however it was signed by SBM on the 22 and HT on the 23 June.

Responsible Officer: Mrs Sheeja Joy (SBM)

Deadline: July 2024

The School's Finance Policy (2024) states that, "official, pre-numbered orders from the Schools' finance systems must be used for all goods and services except utilities, rents, rates and petty cash payments." The School should ensure that official purchase orders are raised prior to the School committing to the expenditure.

Finding/Issue

Examination of the records held for a sample of 15 transactions selected from the School's Bank Statement for the period 28 February 2023 to 29 February 2024 identified one transaction where:

- a) The official purchase order was raised through the SIMS financial management system (23 June 2024) after the services were received (15 June 2024)
- b) The goods receipt was annotated on the invoice for a date before the invoice was received (22 June 2024 by the SBM and 23 June 2024 by the HT).
- c) The remittance for payment was dated (27 June 2024) before the invoice was received by the School (29 June 2024).

Risk

Where an official purchase order is not raised and authorised prior to the School committing to the expenditure, there is a risk that the School's commitment and authorisation process are being bypassed, which could lead to the School undertaking inappropriate expenditure that is not for the benefit of the School.

Control Area 5: Banking

Expected Control

The School should investigate the five unreconciled payments on the Xero financial management system and ensure that these are closed.

For long standing items, the School should consider cancelling and re-issuing the corresponding cheque, with notification issued to the relevant supplier.

School's response

Agreed.

These transactions are payments made (by cheque) to staff or past parents. They have been reminded multiple times and will now be cancelled; this does take some time, as we need to cancel this with the bank too.

Responsible Officer: Mrs Sheeja Joy (SBM)

Deadline: September 2024

Control Area 6: Information Governance

The School should ensure that the Data Protection Policy is reviewed and approved at the next Governing Body meeting, with this documented in meeting minutes to evidence compliance.

The School's Finance Policy (2023) states that the School should *“receive at least monthly bank statements and these should be reconciled with the computerised accounting system. Any discrepancies should be investigated immediately.”*

Issue/Finding

Examination of the School's unreconciled item report from the Xero management system demonstrated that there were five unreconciled items from 2022. (£5.00, £6.45, £9.70, £14.70, and £14.80)

Risk

Any long-standing unreconciled items may cause uncertainty to the School's cash position and could affect cashflow statements. There may be a risk of paying creditors twice until the reconciliation is cleared.

Expected Control

The School's General Protection Data Regulation & Freedom of Information Policy (2023) states that the DPO is responsible for ensuring that everyone employed by the School that manages and handles personal data follows good data protection practices and should be appropriately trained to deliver their duties.

Subsequent reviews should be completed annually.

School's response

Agreed.

DPO training was completed in November 2022, renewal is only recommended every 2 years and is not due until November 2024. Going forward we will ensure that the DPO reports to the Governing Body, and this is evidenced in minutes.

Responsible Officer: Data Protection Officer

Deadline: December 2024

In addition, the DPO should report regularly to the Governing Body issues or concerns relating to data protection within the School.

Finding/Issue

Examination of School's DPO's 'GDPR UK: Advanced training' certificate confirmed that this achieved on 22 November 2022. The School were unable to evidence that the certificate had been renewed.

In addition, examination of the Governing Body meeting minutes from February 2023 to February 2024 was unable to evidence that the DPO had reported to the Governing Body.

Risk

Where the School's DPO has not received updated training, there is a risk that they will not be informed of changes to GDPR best practice and regulation. This in turn could lead to mishandling of the School's data and could increase the risk of data breaches.

Where the DPO does not report to the Full Governing Body, there is a risk that they will not be informed of the DPO's recommendations for improving the School's approach to GDPR.

AUDIT TERMS OF REFERENCE

Christ Church C of E School 2023/24

1. INTRODUCTION & BACKGROUND

- 1.1 This audit is being undertaken as part of the Internal Audit Plan for 2023/24, as agreed by the Council's Audit Committee.
- 1.2 We are adopting a hybrid approach with this audit initially being conducted remotely.

2. AUDIT OBJECTIVES AND METHODOLOGY





- 2.1 To provide an independent and objective opinion on the degree to which the Council's internal control environment supports and promotes the achievement of the Council's objectives. The internal control environment comprises the policies, procedures and operations in place to:
- establish, and monitor the achievement of the service's objectives;
 - identify, assess and manage the risks to achieving the services objectives;
 - facilitate policy and decision making;
 - ensure the economical, effective and efficient use of resources;
 - ensure compliance with established policies (including behavioural and ethical expectations), procedures, laws and regulations;
 - safeguard the service's assets and interests from losses of all kinds, including those arising from fraud, irregularity or corruption; and
 - ensure the integrity and reliability of information, accounts and data, including internal and external reporting and accountability processes.
- 2.2 To confirm that management have controls in place to detect and vigorously, pursue, fraud, corruption, other irregularities, errors and poor value for money.
- 2.3 To confirm that appropriate management action has been taken to implement recommendations for change leading to improvement in performance and/ or control.

Audit Area	Recommendations Made		
	Priority 1 (High)	Priority 2 (Medium)	Priority 3 (Low)
Governance and Leadership	0	0	0
Budget Planning, Monitoring and Reporting	0	1	2
Payroll	1	1	3
Procurement	0	2	1
Banking	0	0	1
Information Governance	1	0	1
Income	0	0	0
School Fund Accounting	0	1	0
Totals	2	5	8

Definitions for Audit Opinions and Recommendations

In order to assist management in using our reports:

We categorise our **audit assurance opinion** according to our overall assessment of the risk management system, effectiveness of the controls in place and the level of compliance with these controls and the action being taken to remedy significant findings or weaknesses.

	Full Assurance	There is a sound system of control designed to achieve the system objectives and the controls are constantly applied.
	Substantial Assurance	While there is basically a sound system of control to achieve the system objectives, there are weaknesses in the design or level of non-compliance of the controls which may put this achievement at risk.
	Limited Assurance	There are significant weaknesses in key areas of system controls and non-compliance that puts achieving the system objectives at risk,
	No Assurance	Controls are non-existent or extremely weak, leaving the system open to the high risk of error, abuse and reputational damage.

Priorities assigned to recommendations are based on the following criteria:

Priority 1 (High)	Fundamental control weaknesses that require immediate attention by management to action and mitigate significant exposure to risk.
Priority 2 (Medium)	Control weakness that still represent an exposure to risk and need to be addressed within a reasonable period.
Priority 3 (Low)	Although control weaknesses are considered to be relatively minor and low risk, still provides an opportunity for improvement. May also apply to areas considered to be of best practice that can improve for example the value for money of the review area.

Statement of Responsibility

We take responsibility to the London Borough of Croydon for this report which is prepared on the basis of the limitations set out below.

The responsibility for designing and maintaining a sound system of internal control and the prevention and detection of fraud and other irregularities rests with management, with internal audit providing a service to management to enable them to achieve this objective. Specifically, we assess the adequacy and effectiveness of the system of internal control arrangements implemented by management and perform sample testing on those controls in the period under review with a view to providing an opinion on the extent to which risks in this area are managed.

We plan our work in order to ensure that we have a reasonable expectation of detecting significant control weaknesses. However, our procedures alone should not be relied upon to identify all strengths and weaknesses in internal controls, nor relied upon to identify any circumstances of fraud or irregularity. Even sound systems of internal control can only provide reasonable and not absolute assurance and may not be proof against collusive fraud.

The matters raised in this report are only those which came to our attention during the course of our work and are not necessarily a comprehensive statement of all the weaknesses that exist or all improvements that might be made. Recommendations for improvements should be assessed by you for their full impact before they are implemented. The performance of our work is not and should not be taken as a substitute for management's responsibilities for the application of sound management practices.

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