

REGULATORY FRAMEWORK

All Independent Schools

ISI Guidance for ISI Inspectors: Inspection of Governance January 2011:

"Does the Governing body/board of proprietor(s) have effective structures to ensure ... proper application of resources, effective long-term planning and proper financial oversight?"

ISI Handbook for Inspection of Schools: The Regulatory Requirements- January 2011 Standard 6(h): Where a pupil wholly or partly funded by a local authority is registered at the school, an annual account of income received and expenditure incurred by the school in respect of that pupil must be submitted to the local authority and on request to the Secretary of State.

All Charities and Charitable Companies are required to comply with the Charity Commission's regulations for the financial procedures, management and reporting within the sector. These are set out in the following publications on www.charity-commission.gov.uk :

Accounting and Reporting by Charities:

[Statement of Recommended Practice \(SORP 2005\)](#)

[CC8: Internal Financial Controls for Charities](#)

[CC10: The Hallmarks of an Effective Charity](#)

[CC15b: Charity Reporting and Accounting: The Essentials 2009](#)

[CC61: Charity Accounts: The Framework](#)

[CC63: Independent Examination of Charity Accounts: Directions and Guidance Notes](#)

[The Companies Act 2006](#): Compliance Regulations for Companies that are also Charities

INTRODUCTION

"Finance is, as it were, the stomach of the country, from which all other organs take their tone."
W.E. Gladstone Liberal Statesman and Prime Minister, 1858

Although ISI Inspections mainly concentrate upon issues relating to the education and welfare of the pupils, they will examine:

- The effectiveness of governance and management
- The efficiency of the administration

Pre-inspection documentation will include, inter alia, Board papers, agendas and minutes and similar paperwork prepared for the Finance Sub-Committee. A school's accounts - both statutory and management, its development plan and the Governors' annual report will all be made available, enabling an assessment to be made of:

- The degree of Governor involvement in financial planning and control
- The system of delegation and monitoring
- Compliance with legal obligations. (For example, evidence that a school has complied with the requirement to submit an annual account of income and expenditure on any pupil who is funded by the Local Authority, both to that Authority and, if required, to the DfE)

Senior and middle managers may be asked by Inspectors to comment on the extent to which funds are "fairly distributed and effectively used."

CONTENTS OF POLICY

Clear financial procedures are needed for Governors to discharge their fiduciary responsibilities as Trustees of the charity (or Company Limited by Guarantee) for ensuring control of resources and for sound financial management of the school. The Finance Department and Clerk to the Governors, have critical roles in ensuring that the flow of relevant and appropriate information reaches both Governors, especially the Chair of the Council and the Chairman of the Finance Sub-Committee, as well as the Principal, who is tasked with day to day responsibility for the financial well-being of the school. The responsibilities of the Finance Department for the financial management of the school are described in detail in the Business and Operations Guide, which stresses the importance of the quality of the relationship with all of the individuals concerned.

The School's financial procedures cover all aspects of its activities and those of any trading company or linked enterprise. They need to be endorsed by the Finance Sub-Committee and/or the main Board and reviewed from time to time. The procedures need to be clear and concise - and available to all the members of staff, both teaching and non-teaching, who exercise any financial responsibilities.

No school can afford to lose sight of the fact that *"Collecting the cash ...is arguably the most important element of the revenue cycle; but one that can often be ignored....management needs to play its part by providing the impetus and focus... to concentrate on this area of the working capital cycle,"* Crowe Clark Whitehill *"Cash is King"*.

COUNCIL'S RESPONSIBILITIES

The Council are responsible for the approval of the:

- Annual Statutory Accounts, the Trustees' Annual Report and the Summary Information Return (SIR)
- Recommendations of the audit report
- School's Development Plan and revisiting it annually
- School's medium term 3-5 year financial plans and cash flow projections
- Annual budget, which costs the Development Plan and the school's projected operating costs for the next year
- The fee rise for the coming year
- Terms and conditions of service for teaching and non-teaching staff, including staff pay and remuneration for the coming year
- Termly and monthly financial management accounts showing projected annual outturn, balance cash flow, as well as a balance sheet
- Balancing the budget and managing/eliminating any deficit
- Reviewing the staff structure and any requirement for redundancies
- Tenders for building contracts and for major maintenance schemes valued over £5,000
- Arrangements for purchasing catering and cleaning supplies tenders/cost comparisons for outsourcing/bringing in-house catering and cleaning functions following recommendations by the Principal and school management
- Orders for goods and services worth over £5,000
- Ensuring procedures for purchasing goods and services meet legal requirements, secure value for money and protect against fraud by staff, contractors and suppliers
- Policy for fee remissions, covering bursaries, scholarships, sibling, staff and children discounts.
- The school's statement on public benefit

- Charging policy for lettings
- Disposal of items worth over £1,000, or items connected with the school's heritage
- The school's banking and insurance arrangements
- Investment policies
- Reserves policies
- Borrowing policies
- All loan and overdraft facilities
- Tender policies
- Risk register
- Business continuity and disaster recovery plan
- Fund-raising policy
- Fee collection policy and the management of late payers
- The appointment of Auditors and other professional advisers
- Opening and closing bank accounts
- Depreciation policies
- Use of key point indicators (KPIs) in order to benchmark financial figures against comparators
- Reviewing the operation of the whistle-blowing policy and the conflict of interest policy

The initial task of scrutinising the above and ensuring compliance with legislation and best practice is delegated to the Finance Sub-Committee, which is the main business committee and makes recommendations to the Council.

Every Governor at Roedean Moira House receives training in his/her financial responsibilities as Trustee.

PRINCIPAL'S RESPONSIBILITIES

As part of the responsibilities for the overall financial well-being of Roedean Moira House, the Governors have vested the following financial responsibilities with the Principal:

- Preparing the school's Development Plan in conjunction with the Senior Leadership Team (SLT), and after it has been costed by the Finance Department, presenting it to the Council
- Implementing the endorsed Development Plan within the school
- Recruiting pupils against endorsed targets
- Marketing the school to prospective parents
- Implementing the school's fund-raising policy, supporting any fund-raising campaigns
- Participating in the process of:
 - Allocating budgets to the academic departments
 - Prioritising bids for expenditure
- Supporting the implementation of the school's policy on the collection of fees
- Supporting the implementation of the school's policy and procedures for awarding bursaries

ALL STAFF: PROCEDURES FOR EFFECTIVE FINANCIAL CONTROL

In order to discharge their responsibilities to the Governors for the effective financial management of the school, the following financial procedures have been approved by the Finance Sub-Committee on behalf of the Council and adopted throughout the school:

Purchasing Goods and Services

Purchases on behalf of the school may only be undertaken by Budget Holders. Three quotes must be obtained before purchases for goods and services worth more than £1,000 are made. The Governors' approval is required for all purchases or contracts over £5,000. *In an emergency, the Chair of Governors or the Chairman of the Finance Sub-Committee can give approval out of committee.*

Budget Holders

All budget holders participate in the annual budgeting process. Each budget holder prepares a budget outlining his/her requirements for operational expenditure for the ensuing year, and prepares or updates a rolling 3 year plan for the routine replacement of equipment in his/her area within the school. (More details are below).

All budget holders are responsible for:

- Placing their orders using numbered and signed purchase orders
- Keeping records of orders
- Ensuring that VAT is included within their calculations of affordability
- Managing within their allocations
- Not exceeding their budgets without prior agreement
- Keeping records of expenditure and receipts
- Ensuring value for money is obtained, e.g. by tendering, using purchase groups
- Checking that the goods received match the order and are undamaged before authorising payment
- Signing the original invoice and passing it to the Finance Department for payment

Budget holders are sent monthly statements by the Finance Department but can ask for more frequent statements.

Budget holders may not commit the school to ongoing annual payments (e.g. leases of equipment or contracts extending beyond one year) without the approval of the Finance Department.

Stock Taking

All budget holders are responsible for the security of the stock which they control. Stock taking forms an important part of this function and involves Budget Holders in:

- Notifying the Accounts Department of stock held by number and value at the end of the academic/ financial year
- In addition:
 - The Catering Department accounts for its stock on a monthly basis
- Obtaining written agreement of the Finance Department before writing down or disposing of surplus stock



ROEDEAN MOIRA HOUSE FINANCIAL PROCEDURES POLICY 2018-19

Staff in Charge of Visits

At Roedeans Moira House, our visits are planned on a no loss basis. Staff in charge of visits are therefore responsible for ensuring that all the costs, including those of accompanying staff and a suitable contingency for emergencies, are taken into account at the planning stage on the basis that it is easier to give parents refunds after a visit than to ask them for additional money. The visit organiser is responsible for obtaining advance approval from parents for their child/children to participate in the trip and then passing details on costs of visits to the Finance Department, so that they can be added to the bills or by collecting all the money and cheques and passing them to the Finance Department for banking. Requests for cash to cover incidental expenses on a visit must be submitted in the appropriate manner, by the member of staff who is organising the visit at least 5 working days in advance, (three weeks if foreign currency or travellers' cheques/pre-paid currency cards are involved).

At the end of the visit, an account of all expenditure should be passed to the Finance Department, which will (if appropriate) arrange for the pupils to receive a refund on their next bill.

Special Catering

The Principal is given an annual entertainment budget for functions. Fundraising events are charged to the Development budget. Provision is also made for Parents' Evenings, Open Evenings and similar functions that are attended by large numbers of parents and prospective parents. Other managers / teams are given small budgets that are intended to cover meals for visiting speakers, or with small groups of pupils and parents. Any other member of staff wishing to entertain visitors is normally expected to use the school dining-room. All requests for special catering by other staff are subject to prior approval and the submission of a formal request that has been approved by the Principal and Finance Department.

Private Work

Members of staff are not allowed to carry out private work on school premises or in school time without the prior agreement of the Principal.

THE FINANCE DEPARTMENT: PROCEDURES FOR EFFECTIVE FINANCIAL CONTROL

The successful performance of the Governors' and Principal's financial responsibilities and duties depends critically upon the timely flow of accurate and relevant financial management information from the Finance Department to support those decisions. Meeting requests for ad hoc financial modelling and cash flow projections are very much part of any Finance Department's routine. The Finance Sub-Committee, acting on behalf of the Full Council, has authorised the Finance Department to adopt the financial procedures described in the remainder of this document.

PREPARING THE BUDGET

The school's aim is to integrate financial planning with the wider organisational planning and management, so that funds can be used to maximum benefit and ensure long-term financial stability. Achieving this necessitates the production of high quality financial analysis and reporting, together with robust controls and procedures.

The annual budget covers all of the school's activities. Specifically, it costs:

- The annual fee rise and projected pupil numbers, which it considers alongside sensitivity modelling of the impact of variations in:
 - Pupil numbers
 - Size of fee rise
 - Additional sources of income (investments, bank interest, holiday lettings, etc.)
 - Staff pay rise, showing the impact of incremental pay on staff costs
 - Senior salaries
 - Establishment of new posts in the school
 - Bursaries and fee concessions
 - Provision for bad debt
 - Purchases for educational and support materials
 - Costs of services
 - Maintenance and repairs
 - Planned capital expenditure

At Roedean Moira House, the annual budgeting process for the next academic and financial year begins in February, at approximately the same time as the Governors finalise the accounts for the preceding year. The process starts with the budget holders being invited to submit bids for their operating activities in the coming year and to prepare or update a rolling 3 year plan for the routine replacement of equipment in their area within the school. Bids from the academic departments will reflect changing priorities in the Development Plan for the school which are reviewed with the Finance Department.

The bids produced by the budget holders who report to the Finance Department are prepared on a similar basis. Plans for refurbishing and upgrading buildings and their infrastructure is produced by the Operations Manager, reflecting professional advice from Surveyors and/or Health and Safety Consultants, cover a rather longer time span - 5-10 years, and are incorporated into a long-term capital and maintenance plan that is updated annually. The principal plans for the capital development of the school are costed and incorporated into the budget, together with proposals for funding capital development, through fund-raising/bank borrowing/cash surpluses/disposal of assets or investments.

The school aims to have a finalised budget by March, by which time it will have a reasonable idea of pupil numbers (based on previous years & recruitment indicators) for the coming September and of required staffing levels. Roedean Moira House normally follows the maintained sector pay award in uplifting its teaching pay scales and the NJC pay scale in increasing the pay of the non-teaching staff. The Government's decisions on teachers' pay for the coming academic year are usually available early in the New Year, so agreeing the level of the pay rise is a comparatively straight-forward process.

Increases in goods and services are taken from the prevailing rate of RPI. Because some of the key data cannot be finalised by the time of the Governor's Finance Sub-Committee in February and the Governors' meeting in March, the presentation to both bodies includes detailed sensitivity analysis of the impact on the operating surplus/gross fee income of different fee increases, pupil

numbers and different increases in staff costs. Bench-marking against the school's own performance indicators forms an important part of this process, and termly management accounts, cash flow projections and updated capital plans all assist Governors in the decision-making process.

The budget, including the fee increase and the pay rise for the ensuing year, is agreed in the November Governors' meeting to allow the international recruitment to be firmed up. Parents are notified of the new fee rise with the bills for the spring term giving them more than a full term's advance notice.

FINANCIAL REPORTING

Trustees' Report and Statutory Accounts

The Trustees' Annual Report and Statutory Accounts are prepared on an accruals basis in accordance with legal and best practice requirements. The prescribed Statement of Recommended Practice (SORP) format conveys a full description of the performance of the school and its assets over the past year, compared with the preceding year's performance. Performance is measured in the profit and loss (P&L) accounts, and the Balance Sheet contains a snapshot on the last day of the financial year. Assets are depreciated in accordance with agreed policy.

The Trustees' Annual Report is a useful forum in which to highlight the school's achievements and results and to give an overview of its many and varied public benefit activities, including its bursary policy. The accounts are approved at the Governors' meeting at the end of the autumn term, and are then signed by the Chair and the Auditors and filed with the Charities Commission and Companies House. The school then completes and submits the Summary Information Return (SIR) to the Charities Commission once it has been approved by the Spring Term Governors' meeting.

Management Accounts

Management Accounts are produced in order to help Governors and the Principal run the school on a day to day basis, to plan ahead and to make the correct decisions. They are generally monthly, circulated to the members of the Finance Sub-Committee and discussed at the Finance Sub-Committee meetings, and show:

- Actual spend against the actual spend for the same period in the previous year
- Identify trends, threats and opportunities
- Actual income and expenditure against budget, highlighting variations and in-year changes against the budget and previous year's outturn
- Forecast end-year income and expenditure against budget and previous year's outturn
- Fee debtors
- Any performance of major projects against agreed targets]

Roedean Moira House recognises that Management Accounts are valuable tools for enabling the school to control and vary expenditure to cope with the unexpected. The Accounts include:

- Key Performance Indicators (KPIs) showing:
 - Staff costs as a percentage of net/gross income
 - Teacher/pupil ratio
 - Fee income as a percentage of net income
 - Fee discounts/bursaries as a percentage of gross fee income
 - The projected surplus as a percentage of gross/net income



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- Debt as a percentage of gross/net income
- Reserves as a percentage of gross income

The Management Accounts may also include information the school's restricted and endowed funds and expenditure.

FEE INCOME

Fee income is by far the largest source of income. The maintenance of an accurate fees ledger, which draws upon information from the school's pupil database, is a major task for the Finance Department. This can be complicated by the tendency for several members of one family and firms / agencies to pay elements of one pupil's bill. It is recognised that the Fees Clerk spends much of the second half of every term in pursuit of information from Music Teachers, Sports Coaches and teachers organising visits in order that the bills can be prepared and dispatched on or shortly after the last day of term.

The Finance Department checks the bills before their dispatch and carries out regular checks on the fees ledger and the bank paying-in books. The fees ledger is cross-checked to the school roll at the start of every term.

Collection of Fees

The Parent Contract makes clear that fees should be paid in full on the first day of term, unless the parents have arranged beforehand to pay by instalment. *Moira House uses the Guidance note by Farrer & Co LLP: "Payment of School Fees and Consumer Credit Update" on the ISBA website.*

Parents are encouraged to pay by direct debit or by electronic transfer into the school's bank account. We do not accept cash payment and comply fully with the Money Laundering Regulations 2007. Where payment is made in a foreign currency, we reserve the right to pass on to parents any commission charged by our bank, or shortfall due to variation in exchange rates. We reconcile all electronic and cheque payments into our bank account against the fees ledger and the paper copies of the bills. The Finance Department receives a weekly schedule of fee debtors from the first week of term to the end of half-term - or such other time as necessary.

Credit Control

Under the terms and conditions for debt recovery set out in the Parent Contract, we send out a reminder letter to parents whose fees have not arrived within 14 working days of the start of term, advising them that the fees are outstanding and that unless they are received within 5 days of the date of the letter. Thereafter, the Finance Department make contact with late payers by email at weekly intervals until payment is made or the debt recovery process is started.

The Principal and Finance Department inform the parents who have not made any payment just before the start of the half term that their child will be permanently excluded if the outstanding fees are not paid. If a pupil is excluded, the parents will be advised that the school's policy, as stated in the Parent Contract is to start recovery action as soon as the child leaves.

The Finance Department produce a termly list of fee debtors for the Finance Sub-Committee.



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Concessions

Roedean Moira House advertises the availability of means-tested bursaries and scholarships. The policy that we follow for granting bursaries and scholarships is entirely transparent and can be viewed on our website, where parents can download application forms. The Principal is responsible for meeting all potential bursary holders and the Finance Department carry out annual means-testing and for subsequently recommending the levels of support and the proposed grants for the ensuing year to the Principal.

Other concessions, including sibling, staff, are offered in accordance with the Governors' policy.

Notification of Fee Rise, Schedule of Fees, Treatment of Deposits and Fees in Lieu of Notice

Roedean Moira House follows the ISBA model Parent Contract. Separate records are maintained of acceptance deposits, which are treated in the same way as advance fees.

Leavers' Bills

Roedean Moira House's policy is for the Finance Department to send a letter to the parents of all parents of leavers at the end of every spring term, enclosing the summer term bill and reminding them that:

- This is not their last bill. That will be sent after their child has left and will cover the extras and consumables taken by their child during the summer term.
- Their acceptance deposit will be returned with their final bill, and will be used to offset the cost of summer term extras and consumables.
- The termly fee is an average of the costs of teaching their child throughout the year. There are no savings in staffing accruing to the school from their child leaving at half-term.

OTHER INCOME

Income from such activities as lettings are tracked and reconciled on a monthly basis by the Finance Department, with regular spot checks made by the Finance Department to ensure correct control of income and expenditure. Regular banking of and recording of cash takings is carried out. Spot checks of the systems are carried out at least once a term.

Fund-Raising Income

Separate records are kept of fund-raising events and gift aided donations. Fund-raising income/Development Funds should they arise will have their own bank account. Gross takings are banked so that they can be verified against paying-in slips. Gift aid is reclaimed at quarterly intervals. The costs of any Development Office/Fund-raising is shown separately and not deducted from gross receipts.

Advance Fees

Roedean Moira House refers to the ISBA Briefing Documents: "Fees in Advance Schemes" of 2005 and "Fees in Advance Scheme - Commutation Tables 1% - 2.5%" of June 2009.



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Investment Income

Restricted, and unrestricted investment income is recorded and reconciled every month. Separate records are kept of each category of income and expenditure.

EXPENDITURE: STAFF COSTS

Expenditure on salaries and other staff related costs is the largest item of any school's expenditure, averaging about 75% of all operational expenditure at Roedean Moira House. The Finance Department prepare the monthly schedule of salaries, tax, National Insurance and pension payments, including calculations of overtime and sick or maternity pay. This schedule is checked and counter-signed by the Principal before the BACS payment into bank accounts is authorised. Copies of payroll statements are periodically reconciled against staff contracts of employment and the pay letters that are held in staff files.

Expenses

The policy at Roedean Moira House for reimbursing expenses incurred by staff is as follows:

- Costs of official journeys made by members of staff with the prior approval of the relevant budget-holder will be reimbursed either on production of receipts or, in the case of car journeys, at the rate per mile as stated. Staff may not countersign their own claims.
- Staff are expected to use standard class rail and to "shop around" for the most favourable rates.
- The costs of a simple meal, but not of alcohol will be reimbursed if the visit lasts for over 5 hours. Permission is always required before booking overnight accommodation.
- Expenses over £15 will be paid by BACS and not from petty cash. Expenses can only be reimbursed if accompanied by proper documentation.
- Expenses cannot be deducted from cash takings; but must be claimed separately, so that accurate records of income and expenditure can be maintained.

PAYMENT OF SUPPLIERS

All invoices are recorded in the purchase ledger by the Finance Department on arrival. They are then dispatched under a numbered covering sheet to the budget holder, who is expected to:

- Sign that the goods ordered matched the order, arrived in an acceptable condition and that the invoice is a proper charge against his/her budget, or
- Advise the Finance Department immediately if there is a need to delay payment for any reason

Cleared invoices are held in batches and payment made by BACS and cheque twice each month (7th & 18th).

Cheque Signatories

At Roedean Moira House, the Governors require two signatories on all cheques. Only one signatory can be from the Finance Department for all cheques between £1,000 and £2,000. For cheques over £2,000 in value, neither signatory can be a member of the Finance Office. Cheques must only be signed as required. Blank cheques are never permitted.



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Standing Orders

Checks are made annually with budget holders that standing order payments reflect valid instructions.

GENERAL FINANCIAL MANAGEMENT

Bank Reconciliation and Suspense Accounts

The Finance Department ensure that a formal reconciliation of all of the school's bank accounts are carried out within 5 days of each month end. The presumption is that monies will not be carried forward in "suspense" beyond the month end. All suspense account balances should be reduced to zero at least at the end of each term.

Tax and VAT

Roedean Moira House refers to Chapters E and F of the ISBA Bursar's Guide and to our professional advisers on issues of tax and vat.

Cash

All cash or cheques that belong to the school must be deposited with the Finance Office as quickly as possible and held in the safe before being banked. Cash is banked regularly by a member of the Finance Department who is given cash and cheques, together with the bank paying-in book, after it has been checked by two members of staff. Where the cash value exceeds £4,000, a second member of staff accompanies the member of the Finance Department to the bank. The school's insurers place a limit of £10,000 on the amount of cash that can be held overnight in the safe or transported. All such restrictions on cash are informed by the school's insurers.

Regular monthly spot checks are conducted on cash, petty cash and the bank paying in book by Finance Department.

Petty Cash

The Finance Department keep a maximum of £675 in petty cash in a locked box in the safe. It is designed to re-pay staff for small outlays that have been made on the school's behalf. Claims up to £15 will be reimbursed from petty cash on presentation of a signed voucher and supporting invoice to the Finance Department. Staff are not allowed to cash personal cheques from the petty cash.

Disposal

The Governors' permission is required for the disposal of heritage items, or of items worth more than £1,000. The Principal's approval is required for the disposal of items worth between £100 and £1,000.

Risk Register and Insurance

The Operations Manager is responsible for updating the register of risks and for arranging insurance cover for the school in accordance with Governors' instructions and statutory requirements.



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Financial Records

Financial Records (accounts and supporting documents, payroll, fee and purchase ledger records, bank statements, paying-in books and reconciliation statements) are maintained in accordance with best practice.

Register of Key Holders

The Site Supervisor is responsible for maintaining an updated register of key holders in the school.

References:

[A: Guidance for ISI Inspectors, Inspection of Governance, Regulatory Requirements, 0216](#)

Guidance for ISI inspectors - Regulatory Requirements 0216

C: Farrer & Co Guidance Notes:

[Payment of School Fees and Consumer Credit Update, 2011](#)

[The Companies Act 2006 and Independent Schools \(Article 2/08 ISBA Bulletin 1/2008\)](#)

[Fee Payments in Cash \(Article 152/07, ISBA Bulletin 8/2007\)](#)

[ISBA Model Parent Contract](#), April 2011

D: [The Financial Health of your School: A Self-Assessment Checklist: Baker Tilly, May 2009, an ISBA Briefing Document.](#)

E: Fees in Advance Schemes, ISBA Guidance, [Model Document](#) and Commutation Tables [1 to 2.5%](#) and [2.5 to 6%](#)

F: The Bursar's Guide: Chapters [D](#), [E](#), [F](#), [G](#), [I](#) and [K](#)

Related policies and documents

This policy should be read in conjunction with the following policies and documents:

- Employee Handbook
- Staff Handbook
- Code of Conduct for Employees
- Health Safety Handbook
- Boarding Staff Handbook
- National Minimum Standards for Boarding Schools
- ISI Handbook for the Inspection of Schools, Regulatory Requirements
- Code of Conduct for Governors: Roles and Responsibilities
- Teachers' Standards
- Departmental Handbook
- Complaints Policy (Parents)
- Complaints Policy (Pupils)

POLICY REVIEWED BY SCHOOL: June 2018

POLICY REVIEWED BY SCHOOL COUNCIL: June 2018

NEXT REVIEW: June 2019