



# The Aylesbury Vale Academy

COLLABORATING *for* EXCELLENCE

## Internal Scrutiny Testing

Summary Report 2024/25

R.M.K Audit Services Limited

[www.rmkane.co.uk](http://www.rmkane.co.uk)

07506 554 239



## **1. Introduction and Summary of Work Undertaken**

### **1.1 Summary of Work Undertaken**

This report is produced for the purpose of reporting to Aylesbury Vale Academy [“the Academy”] in connection with the results of the Internal Scrutiny tests undertaken in 2024/25 academic year.

The work undertaken, as detailed in section 2 below, was our standard tests for an Internal Scrutiny Review.

Our report is prepared solely for the confidential use of the trust. This report is released to the trust on the basis that it shall not be copied, referred to or disclosed, in whole or in part (save as otherwise permitted by agreed written terms), without our prior written consent. Without assuming or accepting any responsibility or liability in respect of this report to any party other than the trust, we acknowledge that the trust may be required to disclose this report to a party demonstrating a statutory right to see it, to enable such other parties to exercise statutory rights of access to this report.

This report is designed to meet the agreed requirements of the trust and particular features of our engagement determined by the trust's needs at the time. This report should not therefore be regarded as suitable to be used or relied on by any other party wishing to acquire any rights against R.M.K Audit Services Limited for any purpose or in any context. Any party other than the trust which obtains access to this report or a copy and chooses to rely on this report (or any part of it) will do so at its own risk. To the fullest extent permitted by law, R.M.K Audit Services Limited will accept no responsibility or liability in respect of this report to any other party and shall not be liable for any loss, damage or expense of whatsoever nature which is caused by any person's reliance on representations in this report.

### **1.2 Respective responsibilities of the trust and R.M.K Audit Services Limited**

As trustees of the trust, you are responsible for ensuring that the trust maintains accounting records which disclose with reasonable accuracy, at any time, the financial position of the trust. As the trust's trustees, you are responsible for compiling the financial statements. It is also the trust's responsibility to extract relevant financial information from the trust's accounting records, to provide relevant financial information for the purposes of the independent review.

It is the responsibility of R.M.K Audit Services Limited to prepare this report.

### **1.3 Our approach**

For the purpose of the engagement, we have been provided by the trust with all bank statements, invoices, and relevant documentation to enable us to carry out our agreed work. The governors of the trust remain solely responsible for this information.

Our engagement was undertaken in accordance with the International Standard on Related Services 4400 applicable to agreed-upon procedures engagements.

The scope of our work and list of procedures performed is fully documented in section 2.

#### **1.4 Inherent Limitations**

Our procedures do not constitute an examination made in accordance with generally accepted auditing standards. Accordingly, we do not express such assurance. Had we performed additional procedures, or had we performed an audit or review of the schedule in accordance with generally accepted auditing or review standards, other matters might have come to our attention that would have been reported to you. This report relates only to the work carried out and does not extend to any other financial information relating to the trust.

We have no responsibility to update this report for events and circumstances occurring after the date of this report.



## 2. Internal Scrutiny Report

Detailed in the table below are the Internal Scrutiny tests carried out on Aylesbury Vale Academy in the 2024/25 Academic year. We summarise too, our observations based upon the outcome of the testing undertaken, and any recommendations that we wish to make to the trust.

CHECKLIST	OBSERVATIONS	RECOMMENDATIONS	ACTION TAKEN
<p><b>1. <u>Articles of Association</u></b></p> <ul style="list-style-type: none"><li>➤ Obtain and review a copy of the Trusts Articles of Association</li><li>➤ Make recommendations where deficiencies exist</li></ul>	<p>The Aylesbury vale academy was incorporated on 10<sup>th</sup> November 2008. Sighted certificate of Incorporation with Company Number 06745367.</p> <p>Sighted also, the Memorandum of Association for the entity.</p> <p>Sighted the Articles of Association for the Trust being a Company limited by Guarantee and not having a share capital.</p> <p>The Articles of Association confirms governance roles and structure. The members of the Academy shall comprise</p> <ul style="list-style-type: none"><li>a) The Principal Sponsor (The Oxford Diocesan Board of Education)</li><li>b) Up to 4 persons appointed by Principal Sponsor</li><li>c) Buckinghamshire County Council</li><li>d) 1 person appointed by Secretary of State</li><li>e) Chairman of the Governors</li><li>f) Any person appointed under article 7</li></ul> <p>The number of Governors should not be less than 3 (unless by ordinary resolution passed stating otherwise). There is no Maximum.</p> <p>The Academy shall have the following Governors:</p>	<p>If the articles require two local authority members and none (or fewer than two) are serving, the trust is not compliant with its own governing document.</p> <p>This could raise governance and legal concerns, especially in dealings with:</p> <ul style="list-style-type: none"><li>a)The Education and Skills Funding Agency (ESFA)</li><li>b)Ofsted</li><li>c)Charity Commission (if the trust is also a charity)</li></ul> <p>What should be done? Rectify the issue as soon as possible:</p>	<p>The Governing Body to discuss and agree a way forward.</p> <p>Implementation date: 31 January 2026.</p>



CHECKLIST	OBSERVATIONS	RECOMMENDATIONS	ACTION TAKEN
	<p>1) Up to 9 sponsor Governors – <i>Sighted five listed on Academy website</i></p> <p>2) Up to 2 LA Governors - <i>None</i></p> <p>3) 1 parent Governor – <i>Sighted two listed on Academy website</i></p> <p>4) 1 staff Governor – <i>Sighted one listed on Academy website</i></p> <p>5) The principal – <i>Sighted one listed on Academy website</i></p> <p>6) Other Governors under various Articles</p> <p>It was noted that there were 3 Co-Opted Governors on the board.</p> <p>It was noted that there was no LA Governors on the board. Upon enquiry it was ascertained that:</p> <p><i>"No decision has been taken not to have LA Governors, but we haven't, recently, had anybody who fitted into this category and the Local Authority have not put anybody forward. There is no desire to amend the Articles to remove this category and so therefore no resolution has been passed.</i></p> <p><i>Going forward the FGB will give consideration to recruiting people into this category"</i></p>	<p>Recruit and appoint the required local authority members to the board.</p> <p>Ensure the appointments are properly recorded and notified as required.</p> <p>If the trust no longer wants to have this requirement it would need to formally amend the articles of association through a special resolution and seek approval from the Secretary of State for Education, as required under academy trust rules.</p> <p> Medium Priority – to be actioned as soon as practical</p>	



CHECKLIST	OBSERVATIONS	RECOMMENDATIONS	ACTION TAKEN
<b>2. <u>Funding Agreement Review</u></b>  ➤ Obtain and review a copy of the Master or Supplemental Funding Agreement ➤ Ensure funding agreement is available on the Trust website ➤ Make recommendations where deficiencies exist	Obtained a copy of funding agreement for the Trust which dates back to 2008. The agreement consisted of multiple clauses (140) over 55 pages.  A number of appendices were also included which were namely:  a) Memo & Arts of the Trust b) Admissions requirements c) SEN pupil arrangements d) Misbehaviour and learning behaviour policy  The funding agreement is prominent on the School Trust website.	No Weakness identified	None Required
<b>3. <u>Scheme of Delegation Review</u></b>  ➤ Obtain and review the Academy's Scheme of Delegation (SoD) ➤ Ensure SoD outlines all relevant details of responsibilities and what Committees and/or personnel are responsible for each element of Governance of the Academy ➤ Make recommendations where deficiencies exist	Obtained and reviewed the Governing Board Scheme of Delegation 2024 – 2025.  The Scheme of Delegation was established by the Governing Board/Board of Trustees, under its powers contained in the Articles of Association of The Aylesbury Vale Academy Trust 2008 (as amended). In the academic year 2024-2025, the Governing Board will form committees, including the statutory ones. These are identified in item 6. below.  The SoD clearly outlined the Terms of reference and powers of each committee laid out in multiple Annex's.	No Weakness identified	None Required



CHECKLIST	OBSERVATIONS	RECOMMENDATIONS	ACTION TAKEN
	<p>Meetings and proceedings of Committees was also covered in detail in the SoD document.</p> <p>Details of membership, Quorums and frequency of meetings were also clearly laid out in the SoD.</p> <p>Document was well laid out, user friendly and covered all relevant areas of a SoD.</p>		
<b>4. School Improvement Plan (SIP)</b>  <ul style="list-style-type: none"><li>➢ Obtain and review the latest SIP document</li><li>➢ Ensure SIP document is detailed under relevant headings with clearly identified goals and strategies for consideration</li><li>➢ Make recommendations where deficiencies exist</li></ul>	<p>Obtained and reviewed school Improvement Plan 2024-25. The Goals were clearly laid out and consistent with the overall aims of the Trust.</p> <p>The document was laid out over several areas being:</p> <ul style="list-style-type: none"><li>a) Quality of Education (Including Outcomes)</li><li>b) Behaviour &amp; Attitudes (Including Attendance)</li><li>c) Personal Development</li><li>d) Leadership &amp; Management</li></ul> <p>Columnar headings under which details were identified and recorded were laid out clearly and consisted of:</p> <ul style="list-style-type: none"><li>a) Aim</li><li>b) SLT Oversight</li><li>c) Strategic Actions</li><li>d) Timelines</li><li>e) Targeted Outcomes</li></ul> <p>This document was informative, clearly presented, user friendly and fit for purpose.</p>	No Weakness identified	None Required



CHECKLIST	OBSERVATIONS	RECOMMENDATIONS	ACTION TAKEN
<p><b>5. <u>Self-Evaluation (SEF)</u></b></p> <ul style="list-style-type: none"><li>➤ Obtain and review the latest SEF document</li><li>➤ Ensure SEF document is detailed under relevant headings with clearly identified goals and strategies for consideration</li><li>➤ Make recommendations where deficiencies exist</li></ul>	<p>Obtained and reviewed self-evaluation 2024-25 which was last updated November 2024.</p> <p>The Goals To make the lives of AVA children better they will:</p> <ol style="list-style-type: none"><li>1. Ensure our teaching and all our work with young people is grounded in high expectations so that learners achieve and read exceptionally well.</li><li>2. Deliver a broad, ambitious and rich curriculum which places reading at its core and, goes beyond the expected.</li><li>3. Close all gaps between the performance of different groups of learners.</li><li>4. Empower learners by developing their character so that they are resilient, aspirational, respectful and have excellent attitudes to their learning.</li><li>5. Inspire attendance to be consistently above the national average.</li></ol> <p>The document was laid out over several headings being:</p> <ol style="list-style-type: none"><li>a) DISTINCTIVE SCHOOL CONTEXT</li><li>b) QUALITY OF EDUCATION</li><li>c) LEADERSHIP AND MANAGEMENT</li><li>d) BEHAVIOUR AND ATTITUDES</li><li>e) PERSONAL DEVELOPMENT</li><li>f) OVERALL EFFECTIVENESS</li><li>g) PERFORMANCE INFORMATION 2022-23</li></ol>	<p>It is recommended to update the document for the following items referred to in the comments section:</p> <ol style="list-style-type: none"><li>1. <i>ISDR data being updated Jan 2025 to Inc. reviews of marking with 34 uplifted grades</i></li><li>2. <i>Staff survey feedback Autumn term highlights of progress and next steps.</i></li></ol> <p>This would make the document more complete and may have a bearing on other aspects of the document once the details are collated and included.</p> <p> Low Priority – recommendations made but little risk – to be dealt with in the future</p>	<p>Points noted and document will be updated.</p> <p>Implementation date: 31 January 2026.</p>



CHECKLIST	OBSERVATIONS	RECOMMENDATIONS	ACTION TAKEN
	Noted some further data was required to be added to this document based on the various comments contained therein.		
<p><b>6. Committees</b></p> <ul style="list-style-type: none"><li>➤ Obtain and review the Academy Committees in place</li><li>➤ Ensure minimum requirements of Articles of Association are adhered to</li><li>➤ Make recommendations where deficiencies exist</li></ul>	<p>A) The following Standing Committees, is established to exercise various functions:</p> <ul style="list-style-type: none"><li>• Finance, Audit, Risk, Premises and Policies Committee</li><li>• Education Committee</li></ul> <p>B) The following Occasional Committees are established to exercise the functions set out in various Annexes to the Scheme of Delegation respectively:</p> <ul style="list-style-type: none"><li>▪ Admissions Committee</li><li>▪ Staff Discipline/Dismissal Committee</li><li>▪ Staff Discipline/Dismissal Appeal Committee</li><li>▪ Pupil Discipline Committee</li><li>▪ Pay Review Appeals Committee</li></ul> <p>Committee structures appear adequate and relevant to the Trust.</p>	No Weakness identified	None Required



CHECKLIST	OBSERVATIONS	RECOMMENDATIONS	ACTION TAKEN
<p><b>7. <u>Minutes Review # 1</u></b></p> <p>➤ Obtain and review minutes of a recent Academy Committee meeting to ensure compliance with details gleaned from other documents provided during Internal Scrutiny review</p> <p>➤ Make recommendations where deficiencies exist</p>	<p>Obtained and reviewed minutes of the meeting of the Finance, Audit, Risk, Premises and Policies Committee of Aylesbury Vale Academy Held in the Boardroom on 12 February 2025 at 10am.</p> <p>Present and in attendance where Chairperson, Parent Governor, Sponsored Governor 1, Sponsored Governor 2, Academy Principal, Clerk to Governors, Finance Manager, Primary Head and Academy Business Manager.</p> <p>A full quorum was present on this occasion.</p> <p>Topics covered at the meeting included:</p> <ul style="list-style-type: none"><li>• Notification of any other business</li><li>• Declarations of interest pertaining to the agenda</li><li>• Minutes of the last meeting and matters arising</li><li>• Finance and Staffing</li><li>• Audit and Risk</li><li>• Premises, Health, and safety</li><li>• Policies for review</li></ul> <p>Meeting minutes reflect adherence to terms of reference as outlined in Academy scheme of delegation.</p>	No Weakness identified	None Required



CHECKLIST	OBSERVATIONS	RECOMMENDATIONS	ACTION TAKEN
<p><b>8. <u>Minutes Review # 2</u></b></p> <p>➤ Obtain and review minutes of a recent Academy Committee meeting to ensure compliance with details gleaned from other documents provided during Internal Scrutiny review</p> <p>➤ Make recommendations where deficiencies exist</p>	<p>Obtained and reviewed minutes of the meeting of the Governing Board of The Aylesbury Vale Academy Held in the Boardroom on 12 December 2024 at 3.30pm.</p> <p>Some personnel Present and in attendance where Chairperson, Co-opted governors 2 , Sponsored Governors 3, Academy Principal, Clerk to Governors.</p> <p>A full quorum was present on this occasion.</p> <p>Topics covered at the meeting included:</p> <ul style="list-style-type: none"><li>• Notification of any other business</li><li>• Declarations of interest pertaining to the agenda</li><li>• Minutes of the last meeting and matters arising</li><li>• Strategic management</li><li>• Approval of Trustees report and financial statements 2023/24</li><li>• Governance</li><li>• Committee reports</li><li>• Polices for review</li><li>• Any other business</li></ul> <p>Meeting minutes reflect adherence to terms of reference as outlined in Academy scheme of delegation.</p>	No Weakness identified	None Required



CHECKLIST	OBSERVATIONS	RECOMMENDATIONS	ACTION TAKEN
<p><b>9. <u>Risk Register</u></b></p> <ul style="list-style-type: none"><li>➤ Obtain and review the latest Risk Register</li><li>➤ Ensure Risk Register is detailed under relevant headings with clearly identified goals and strategies for consideration</li><li>➤ Make recommendations where deficiencies exist</li></ul>	<p>Obtained and reviewed Risk Management Policy and Risk Register which was last updated 23<sup>rd</sup> October 2024. This document is reviewed annually.</p> <p>The top 10 risks are highlighted in orange and reviewed at every Finance, Audit and Risk Committee meeting</p> <p>The Risks to the Academy are divided into four sections:</p> <ol style="list-style-type: none"><li>1. Strategic and Reputational Risks</li><li>2. Operational Risks</li><li>3. Compliance Risks</li><li>4. Financial Risks</li></ol> <p>Columnar headings under which details were identified and recorded were laid out clearly and consisted of:</p> <ol style="list-style-type: none"><li>a) Category</li><li>b) Sub-category</li><li>c) Specific</li><li>d) Likelihood of occurring</li><li>e) Impact if occurs</li><li>f) Overall Risk</li><li>g) Response (transfer, treat, tolerate or terminate)</li><li>h) Control procedures</li><li>i) Person(s) responsible for action</li></ol> <p>This document was informative, clearly presented, user friendly and fit for purpose. Review periods are adequate with the top risks being constantly reviewed throughout the year.</p>	<p>No Weakness identified</p>	<p>None Required</p>



CHECKLIST	OBSERVATIONS	RECOMMENDATIONS	ACTION TAKEN
<b>10. <u>Pecuniary Interests</u></b>  ➤ Obtain details of Pecuniary Interests  ➤ Ensure Pecuniary Interests are disclosed on the Trusts website in accordance with legislation to do so	<p>Reviewed the Schools website and details of the board/committee members.</p> <p><a href="https://www.theacademy.me/attachments/download.asp?file=807&amp;type=pdf">https://www.theacademy.me/attachments/download.asp?file=807&amp;type=pdf</a></p> <p>Academy Trust Handbook Section 5.47 (2023 edition) states:</p> <p>“Trusts must publish on their websites relevant business and pecuniary interests of trustees, members, and local governors.”</p> <p>This includes:</p> <ul style="list-style-type: none"><li>• Directorships</li><li>• Partnerships</li><li>• Shareholdings</li><li>• Relationships with external suppliers or contractors</li></ul> <p>This requirement is binding because compliance with the Handbook is a condition of your funding agreement with the Secretary of State for Education. Compliance in this manner appears to be satisfied.</p>	No Weakness identified	None Required
<b>11. <u>Data Protection Policy document review</u></b>  ➤ Obtain a copy of the most recent Data Protection Policy document.  ➤ Review Procedures in place to ensure they are fit for purpose and	<p>Obtained and reviewed policy document AVA.027 which was updated 12.02.2025 . Next review date is scheduled for February 2026.</p> <p>The policy document contains some 20 sections together with related appendices and includes all items that one would reasonably expect to be covered by such a document.</p>	No Weakness identified	None Required



CHECKLIST	OBSERVATIONS	RECOMMENDATIONS	ACTION TAKEN
<p>to ensure that they meet the requirements of the school.</p> <p>➤ Ensure that the Academies ICO Certification is in place and in date.</p>	<p>Observed the latest ICO Certificate Nr. Z1870199 which was in date up to 28 March 2026.</p> <p>The DPO officer details were identified on the certificate.</p>		
<p><b>12. <u>Insurance Cover</u></b></p> <p>➤ Establish what insurance cover is place at the school relation to cyber-attack losses and GDPR</p> <p>➤ Establish what criteria must be met by the school in order to be covered against losses arising due to a cyber-attack</p> <p>➤ Ensure that the level of cover is adequate to cover any potential losses arising to the Trust</p> <p>➤ Ensure that the school constantly ensures it satisfies all criteria to obtain RPA Cyber Cover</p>	<p>Risk Protection Arrangement Cover</p> <p>To be eligible for RPA Cyber cover, there are 4 conditions that members must meet:</p> <p>1. <b>Have offline backups.</b></p> <p>It is vital that all education providers take the necessary steps to protect their networks from cyber-attacks and have the ability to restore systems and recover data from backups. Education providers should ask their IT teams or external IT providers to ensure the following:</p> <p>a) Backing up the right data. Ensuring the right data is backed up is paramount. See Critical Activities for a suggested list of data to include.</p> <p>b) Backups are held fully offline and not connected to systems or in cold storage, ideally following the 3-2-1 rule explained in the NCSC blog Offline backups in an online world: <a href="https://www.ncsc.gov.uk/blog-post/offline-backups-in-an-online-world">https://www.ncsc.gov.uk/blog-post/offline-backups-in-an-online-world</a></p>	No Weakness identified	None Required



CHECKLIST	OBSERVATIONS	RECOMMENDATIONS	ACTION TAKEN
	<p>c) Backups are tested appropriately, not only should backups be done regularly but need to be tested to ensure that services can be restored, and data recovered from backups.</p> <p>2. All Employees or Governors who have access to the Member's information technology system must <b>undertake NCSC Cyber Security Training annually.</b></p> <p>3. <b>Register with Police Cyber Alarm.</b> Registering will connect Members with their local police cyber protect team and in the majority of cases, a cyber-alarm software tool can be installed for free to monitor cyber activity.</p> <p>4. <b>Have a Cyber Response Plan in place.</b></p> <p>Sighted DfE Confirmation of risk protection arrangement (RPA) membership for period 1/9/24-31/8/25.</p> <p>Confirmed Cyber cover in place as being Compensation for increase in cost of working, incurred by the Member, resulting from a Cyber Incident. Incident response services following a Cyber Incident:</p> <ul style="list-style-type: none"><li>• Cyber cover Limits - £250,000 each and every loss and in the aggregate any one Membership Year for an individual Member. Where a Member is part of a Group Network with other RPA Members the aggregate liability shall be £750,000 in any one Membership Year for the Group Network.</li></ul>		



CHECKLIST	OBSERVATIONS	RECOMMENDATIONS	ACTION TAKEN
	<ul style="list-style-type: none"><li>Member Retention - £1,000 (Primary Academy) £2,000 (all other Members)</li></ul>		
<b>13. <u>Establish what policies are in place at the school relating to Cyber and online safety and GDPR</u></b>	<p>It was established that the following policies were in existence at the school:</p> <p><b>A)</b> Data Protection Policy This Policy is available on the school's website. The policy is up to date and was last reviewed in February 2025. This policy is comprehensive and fit for purpose.</p> <p><b>B)</b> E-safety Policy This Policy is available on the school's website. The policy is up to date and was last reviewed in December 2023. This policy is comprehensive and fit for purpose. This policy was to be reviewed in December 2024.</p> <p><b>C)</b> Privacy notice for Pupils This notice was not available on the school's website.</p> <p><b>D)</b> Privacy notice-School Workforce This notice was not available on the school's website.</p> <p><b>E)</b> Privacy notice for trustees ESFA This notice was not available on the school's website.</p>	<p>E-safety Policy is overdue for review. This policy should be reviewed and updated if required.</p> <p> Low Priority – to be actioned in the future</p>	E-Safety policy will be reviewed by November 2025.
<b>14. <u>Cyber Response Plan</u></b>	Reviewed the following document Cyber Incident Response Plan (AVA. 060) which was last updated in May 2025.	No Weakness identified	None Required



CHECKLIST	OBSERVATIONS	RECOMMENDATIONS	ACTION TAKEN
<ul style="list-style-type: none"><li>➤ Obtain details of the school's cyber response plan</li><li>➤ Ensure that all policy documents are relevant and fit for purpose</li><li>➤ Ensure that policy document is reviewed regularly and is up to date</li></ul>	<p>Contents of the document covered include:</p> <ol style="list-style-type: none"><li>1. Purpose and Objectives</li><li>2. Standards and Frameworks</li><li>2.1. Risk Protection Arrangement (RPA)</li><li>3. High Level Incident Response Process</li><li>4. Common Security Incidents and Responses<ol style="list-style-type: none"><li>4.1. Common Threat Vectors</li><li>4.2. Common Cyber Incidents</li></ol></li><li>5. Roles and Responsibilities<ol style="list-style-type: none"><li>5.1. Points of Contact for Reporting Cyber Incidents</li><li>5.2. Cyber Incident Response Team (CIRT)</li><li>5.3. Senior Management Team (SMT)</li><li>5.4. Roles and Relationships</li></ol></li><li>6. Communications<ol style="list-style-type: none"><li>6.1. Staff Media Contact</li></ol></li><li>7. Incident Notification and Reporting</li><li>8. Detection, Investigation, Analysis and Activation<ol style="list-style-type: none"><li>8.1. Incident Classification</li><li>8.2. Investigation Questions</li><li>8.3. Escalation and De-escalation</li></ol></li><li>9. Containment, Evidence Collection &amp; Remediation</li></ol>		



CHECKLIST	OBSERVATIONS	RECOMMENDATIONS	ACTION TAKEN
	<p>9.1. Containment</p> <p>9.2. Documentation</p> <p>9.3. Evidence Collection and Preservation</p> <p>9.4. Remediation Action Plan</p> <p>10. Recovery</p> <p>11. Learn and Improve</p> <p>11.1. Post Incident Review</p> <p>11.2. Update and Test Cyber Incident Response Plan</p> <p>11.3. Training</p> <p>Various Appendices were also provided within the document, being:</p> <p>A - Terminology and Definitions</p> <p>B - Cyber Incident Response Readiness Checklist</p> <p>C - Incident Triage Questions</p> <p>D - Situation Report Template</p> <p>E - Incident Log Template</p> <p>F - Evidence Register Template</p> <p>G - Remediation Action Plan Template</p> <p>H - Post Incident Review Analysis Template</p> <p>I - Action Register Template</p> <p>J - Communication Templates</p>		



CHECKLIST	OBSERVATIONS	RECOMMENDATIONS	ACTION TAKEN
	<p>Policy Document is adequate and well laid out covering all aspects of a Cyber response plan and adhering to conditions of insurance cover requirements.</p> <p>The Academy is compliant with DFE standards and guidance.</p>		
<b>15. <u>Historic cyber-attacks experienced by the school</u></b>  ➤ Establish whether the Academy has been prone to previous cyber attacks  ➤ What has the Academy learned from these previous experiences and what have they put in place to reduce risk to the school	<p>Upon enquiry it was reported that there have not been any cyber attacks in recent years at the academy.</p>	No Weakness identified	None Required
<b>16. <u>Cyber training for staff</u></b>  ➤ Establish what training is provided to staff and members in relation to Cyber safety in order to satisfy insurance cover requirements  ➤ Ensure that the Academy has a record of what staff member has completed what courses and when	<p>In accordance with cyber cover requirements for RPA "all Employees or Governors who have access to the Member's information technology system must undertake NCSC Cyber Security Training annually".</p> <p>We have sighted and reviewed details of staff members having undertaken cyber training in order to comply with the above requirements of cyber cover.</p> <p>During this review, we observed a list of 224 staff personnel who had confirmed completion of NCSC cyber training between September 2024 and June 2025.</p>	<p>It is recommended that all staff personnel provide completed certificates of training, upon course completion, which should be maintained on their HR/CPD/Training record files.</p>	<p>Will review this, however, the certificates that are provided by the website are blank and so do not confirm completion of the course. Instead we use a declaration form. Review by December 2025.</p>



CHECKLIST	OBSERVATIONS	RECOMMENDATIONS	ACTION TAKEN
<ul style="list-style-type: none"><li>➤ Make recommendations where deficiencies exist</li></ul>	<p>Upon enquiry regarding the signed declarations it was established that "staff members complete the NCSC training and then they need to complete this declaration form to say that "they have completed, understood and will comply with the training". We then do not ask them to send us a copy of their certificate as the certificates the training produces are blank for them to write their own name and date in, so don't provide proof that the training was done. Instead we use their declaration".</p> <p>The training is on the following website - <a href="https://www.ncsc.gov.uk/information/cyber-security-training-schools">https://www.ncsc.gov.uk/information/cyber-security-training-schools</a></p>	 <i>Low Priority – to be actioned in the future</i>	
<b>17. Emergency Plan – Sections Review</b> <ul style="list-style-type: none"><li>➤ Obtain a copy of the latest Emergency Plan for the individual Trust school</li><li>➤ Ensure that the Emergency Plan has been updated recently and is monitored accordingly for new updates</li><li>➤ Identify the last review date and enquire how often the school or Trust revisits this</li><li>➤ Establish who is responsible for updating the Emergency Plan</li></ul>	<p>Obtained a copy of the schools latest Emergency Plan document reference AVA.103. This document sets out our emergency response and business continuity arrangements. It helps us be prepared for and recover from unexpected disruptions. This is a statutory policy. This policy was approved on 23<sup>rd</sup> October 2024 with next review date set 1 year later in 2025.</p> <p>This plan will be activated in the event of a critical incident or an emergency i.e. when an incident occurs that impact on the delivery of our critical activities and when normal responses, procedures and coping strategies are deemed insufficient to deal with the effects.</p> <p>The document is divided into three sections:</p>	<p>First Aid Policy Document should be reviewed and updated where possible.</p>  <i>Low Priority – recommendations made but little risk – to be dealt with in the future</i>	<p>The updated First Aid Policy is awaiting approval by Gavin Gibson, Academy principal.</p> <p>Implementation date: 30 April 2025</p>



CHECKLIST	OBSERVATIONS	RECOMMENDATIONS	ACTION TAKEN
<p>➤ Make recommendations where deficiencies exist</p>	<p>1) <b>Contact Details.</b> This refers to contact details for all relevant parties being:</p> <ul style="list-style-type: none"><li>a) school staff and governors</li><li>b) extended services</li><li>c) First Aid</li><li>d) local authority</li><li>e) local radio stations</li><li>f) other organisations</li><li>g) Blank table to be completed during an incident with the names, contact details and notes</li></ul> <p>2) <b>Activation.</b> This covers a) notification of the incident b) Initial action to take c) location of emergency grab bags and contents</p> <p>3) <b>Roles and responsibilities</b> of various personnel:</p> <ul style="list-style-type: none"><li>a) Co-ordinator</li><li>b) Business Continuity Leader</li><li>c) Communications Leader</li><li>d) Log-keeper</li><li>e) Media Manager</li><li>f) Resource Manager</li><li>g) Welfare Leader</li><li>h) Educational Visit Leader</li></ul> <p>The updating of the Emergency plan is the responsibility of the School Business manager.</p>		



CHECKLIST	OBSERVATIONS	RECOMMENDATIONS	ACTION TAKEN
	<p>The policy is up to date and reviewed regularly.</p> <p>Various linked documents include Risk Register, Health &amp; Safety Policy, Fire Safety Policy, Fire Evacuation Plans, Lockdown Policy, Annual Health &amp; Safety Report, Various Risk Assessments, COSH Register, First Aid Policy.</p> <p>It is clear from this review that the schools emergency plan is comprehensive, concise and clear. The document is well laid out and user friendly. It provides practical advice to users and comprehensive examples and samples for users.</p> <p>It was noted that a related policy document First Aid Policy was last updated 08.11.23 with a next review date 08.11.24. This policy is overdue for a review and/or update.</p>		
<p><b>18. Emergency Plan – Appendices Review</b></p> <ul style="list-style-type: none"><li>➤ Obtain a copy of the latest Emergency Plan for the individual Trust school</li><li>➤ Ensure that the Emergency Plan has been updated recently and is monitored accordingly for new updates</li><li>➤ Identify the last review date and enquire how often the school or Trust revisits this</li></ul>	<p>Obtained a copy of the schools latest Emergency Plan document reference AVA.103. This document sets out our emergency response and business continuity arrangements. It helps us be prepared for and recover from unexpected disruptions. This is a statutory policy. This policy was approved on 23<sup>rd</sup> October 2024 with next review date set 1 year later in 2025.</p> <p>This plan will be activated in the event of a critical incident or an emergency i.e. when an incident occurs that impact on the delivery of our critical activities and when normal responses, procedures and coping strategies are deemed insufficient to deal with the effects.</p>	No Weakness identified	None Required



CHECKLIST	OBSERVATIONS	RECOMMENDATIONS	ACTION TAKEN
<ul style="list-style-type: none"><li>➤ Establish who is responsible for updating the Emergency Plan</li><li>➤ Make recommendations where deficiencies exist</li></ul>	<p>The document contains 11 Appendices as listed below:</p> <ul style="list-style-type: none"><li><b>1) POST INCIDENT SUPPORT</b><ul style="list-style-type: none"><li>• assistance for pupils and parents / carers</li><li>• general actions</li><li>• returning after a period of absence</li><li>• funeral arrangements</li><li>• remembrance</li></ul></li><li><b>2) BUSINESS CONTINUITY</b><ul style="list-style-type: none"><li>• Paper-based records</li><li>• Electronic records</li><li>• Remote learning</li></ul></li><li><b>3) SITE INFORMATION</b><ul style="list-style-type: none"><li>• Utility supplies</li><li>• Internal hazards</li><li>• Pre-designated areas</li></ul></li><li><b>4) EVACUATION</b><ul style="list-style-type: none"><li>• Signals</li><li>• Assembly points fire/bomb</li><li>• Pre-identified buddy school / place of safety / rest centre</li></ul></li><li><b>5) LOCKDOWN</b><ul style="list-style-type: none"><li>• Signals</li><li>• Lockdown</li></ul></li><li><b>6) SCHOOL CLOSURE</b><ul style="list-style-type: none"><li>• Generic actions - initial response</li><li>• Generic actions - ongoing response</li></ul></li><li><b>7) COMMUNICATIONS</b></li></ul>		



CHECKLIST	OBSERVATIONS	RECOMMENDATIONS	ACTION TAKEN
	<ul style="list-style-type: none"><li>Designated telephone lines</li><li>Methods of communication</li><li>Group</li></ul> <p><b>8) BOMB THREATS</b> Detailed questionnaire provided to capture information if school receives a call regarding a bomb threat.</p> <p><b>9) SUSPICIOUS PACKAGES</b><ul style="list-style-type: none"><li>Initial response - upon receiving a suspicious package</li><li>Initial response - if exposed to a potentially hazardous substance</li></ul></p> <p><b>10) LOG-KEEPING GUIDELINES</b> Example of note taking provided which highlights how to capture and record information taken in note format. Tips on how to record notes in chronological order. The recording of times and dates is critical.</p> <p><b>11) Sample Staff and Parent Briefing</b> Example of a staff and parent written statement is provided should one be required.</p> <p>It is clear from this review that the appendices to the schools emergency plan are comprehensive, concise, and clear. All areas appear to be covered off in this document.</p> <p>The updating of the Emergency plan is the responsibility of the School Business manager.</p> <p>The policy is up to date and reviewed regularly.</p>		



CHECKLIST	OBSERVATIONS	RECOMMENDATIONS	ACTION TAKEN
<b>19. Website Review</b> <ul style="list-style-type: none"><li>➤ Review Schools website to identify what relevant policies are publicly displayed</li><li>➤ Ensure published policy documents are in date and current</li></ul>	<p>Following review of the schools website on 26<sup>th</sup> March 2025, it was observed that the following relevant policy documents and dates were noted:</p> <ol style="list-style-type: none"><li>1) <i>Fire Safety Policy and Procedures 22.05.2024</i></li><li>2) <i>Health &amp; Safety Policy 22.05.2024</i></li><li>3) <i>Risk Assessment Policy</i></li><li>4) <i>Emergency Plan 23.10.2024</i></li></ol> <p>Relevant publications were displayed as required on the schools website.</p>	No Weakness identified	None Required
<b>20. Risk Register</b> <ul style="list-style-type: none"><li>➤ Obtain a copy of the latest Risk Register for the individual Trust school</li><li>➤ Ensure that the Risk register has been updated recently and is monitored accordingly for new updates</li><li>➤ Identify the last review date and enquire how often the school or Trust revisits this</li><li>➤ Establish who is responsible for updating the Risk Register</li></ul>	<p>Obtained and reviewed a copy of the schools Risk Management Policy and Risk Register. This was last updated on 23.10.24 with its next review date scheduled for 23.10.25.</p> <p>The Risk Register has been completed in the form recommended in the Academy Trust Handbook and it uses the terms listed there. It shall be revised annually by the Business Manager who will recommend it to the Governing Body.</p> <p>Upon review it was noted that there was a section referred to as Natural disaster risk which refers to the Risk of the impact an uncontrollable event will have on the Academy e.g., fire, flood, energy disruption. Although the likelihood of occurring is low the impact will be high. The overall risk is deemed a medium one. It will be treated and transferred as</p>	No Weakness identified	None Required



CHECKLIST	OBSERVATIONS	RECOMMENDATIONS	ACTION TAKEN
<ul style="list-style-type: none"><li>➤ Make recommendations where deficiencies exist</li></ul>	<p>required. Some risk transferred to insurers. There is Regular review of the schools Emergency Plan. Person responsible for action is the School Business Manager.</p> <p>The risk register also includes a section on Technology risk which is prudent. The school has a separate plan in place in respect of a Cyber incident. This is covered below.</p> <p>The schools Risk register is appropriately laid out and covers all aspects of a Risk Register. The Risk register is up to date, reviewed regularly and fit for purpose.</p>		
<b>21. <u>Cyber Incident Response Plan (CIRP)</u></b> <ul style="list-style-type: none"><li>➤ Obtain a copy of the latest Cyber Incident Response Plan for the Trust school</li><li>➤ Ensure that the CIRP has been updated recently and is monitored accordingly for new updates</li><li>➤ Identify the last review date and enquire how often the Trust school revisits this</li><li>➤ Make recommendations where deficiencies exist</li></ul>	<p>Obtained and reviewed a copy of the schools Cyber Response Plan. No date was provided on the plan document.</p> <p>The document layout was clear, concise, and informative with good examples and sample documents included should the need arise to require such information.</p> <p>Contents of the plan included:</p> <ol style="list-style-type: none"><li>1) Authority and Review. However, these details were not provided in the document.</li><li>2) Purpose and Objectives</li><li>3) Standards and Frameworks. Refers to RPA cover requirements which is mandatory for cover to be in place.</li><li>4) High Level Incident Response Process</li></ol>	<p>Details of Authority and Review should be included in the plan document. This policy should be reviewed and updated annually in line with best practice.</p> <p> <i>Low Priority – recommendations made but little risk – to be dealt with in the future</i></p>	<p>This will be added to our list of policies on annual review and formal approval requested at our Finance, Audit, Risks, Policies and Premises meeting in May.</p> <p>Implementation date: 31 May 2025</p>



CHECKLIST	OBSERVATIONS	RECOMMENDATIONS	ACTION TAKEN
	<p>5) Common Security Incidents and Responses</p> <p>6) Roles and Responsibilities. Includes detailed information on:</p> <ul style="list-style-type: none"><li>• Points of Contact for Reporting Cyber Incidents</li><li>• Cyber Incident Response Team (CIRT)</li><li>• Senior Management Team (SMT)</li><li>• Roles and Relationships</li></ul> <p>7) Communications</p> <p>8) Incident Notification and Reporting</p> <p>9) Detection, Investigation, Analysis and Activation</p> <p>10) Containment, Evidence Collection &amp; Remediation</p> <p>11) Recovery</p> <p>12) Learn and Improve</p> <p>The Plan also incorporates a number of appendices to include Cyber Incident Response Readiness Checklist, Incident Triage Questions, Situation Report Template and Post Incident Review Analysis Template, to name but a few.</p>		