

Internal Audit Report

Management of School Funds

20 January 2026

CEJ2501

**Overall
Assessment**

Limited Assurance

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This Internal Audit review is conducted for the City of Edinburgh Council under the auspices of the 2025/26 internal audit plan approved by the Governance, Risk and Best Value Committee in March 2025. The review is designed to help the City of Edinburgh Council assess and refine its internal control environment. It is not designed or intended to be suitable for any other purpose and should not be relied upon for any other purpose. The City of Edinburgh Council accepts no responsibility for any such reliance and disclaims all liability in relation thereto.

The internal audit work and reporting has been performed in line with the requirements of the Global Internal Audit Standards (UK Public Sector) and as a result is not designed or intended to comply with any other auditing standards.

Although there are specific recommendations included in this report to strengthen internal control, it is management's responsibility to design, implement and maintain an effective control framework, and for the prevention and detection of irregularities and fraud. This is an essential part of the efficient management of the City of Edinburgh Council. Communication of the issues and weaknesses arising from this audit does not absolve management of this responsibility. High and Critical risk findings will be raised with senior management and elected members as appropriate.

Executive Summary

Overall
Assessment

Limited
Assurance

Engagement conclusion and summary of findings

The audit concludes that there is limited assurance on the system of governance, risk management and control for management of school funds with significant gaps, weaknesses, and areas of non-compliance identified. Several areas require improvement to improve controls and reduce associated risks, including:













- establishing risk management processes for individual schools, and providing targeted training and guidance to raise fraud awareness within schools
- reviewing and updating key procedures to ensure alignment to current systems and practices
- refreshing training materials, monitoring completion of training, and providing targeted training and structured support for those undertaking financial duties
- reinforce the requirement to fully comply with procedures, with assurance via central checks and audits

- clarify the definition on permissible use of the school fund and communicate updated guidance
- mandate Pebble system use across all schools for consistent financial control, and accelerate rollout of cashless schools to eliminate cash handling risks
- review the establishment of School Fund Committees to ensure adequate governance and stakeholder representation across all schools
- review roles, responsibilities, and capacity to fulfil key compliance checks.

Areas of effective practice

- business manager peer groups and meetings are in place to share information and best practices
- successful piloting of the cashless schools initiative in 6 establishments, which will be rolled out across all schools in the near future.

Audit Assessment

Audit Area	Control Design	Control Operation	Findings	Priority Rating
1. Risk Management			Finding 1 – Risk Management and Fraud Awareness	High Priority
2. Policies, Procedures, and Training			Finding 2 – Procedures and Training	High Priority
3. Record Keeping			Finding 3 - Compliance with Procedures	High Priority
4. Cash, Banking, and Procurement Controls			Finding 4 – System Use and Cash Management Practices	Medium Priority
5. Local and Central Oversight			Finding 5 – Governance, Oversight, and Assurance	High Priority
6. Information Governance			See Finding 4.	As per Finding 4

Background and scope

Each school in Edinburgh manages its own 'School Fund', which segregates money from the Devolved School Management (DSM) budgets, and is to be used solely for the benefit of the pupils in the school, to manage expenditure for items such as school trips or musical instruments. The Management of the School Fund Procedure requires each school to convene a School Fund Committee chaired by the school's Head Teacher (HT), who has ultimate responsibility for the School Fund. School Business Managers (BMs) look after the day-to-day operation of the School Fund, however legal responsibility rests with Education Services, as the accounts are used for public funds and are administered by an employee of the Council.

The Council uses the 'Pebble' cash day-book system, which is integrated with 'ParentPay', an interface allowing parents to contribute to the school fund for specific events such as school trips.

BMs are generally either employed in a single high-school or split their time across two primary schools (18 hours per school), although this varies in some schools. The roles and responsibilities of BMs within schools are wide-ranging due to being a key member of the management team, and include but are not limited to:

- key budget holder for central office per capita budget, and management of the DSM budgets
- responsible for all income, reconciliation of bank accounts, and all financial transactions, as well as cash and banking and authorisation controls
- coordinating all personnel practice within the school including disciplinary and grievance, sickness absence, job specifications, and recruitment
- direct line management of all support staff and services including staff training, development, and management of the admin-based computer systems used by staff
- facilities management coordinator with FM officers (internal or external)
- responsible for the health and safety of all school users and visitors as well as the building itself.

Scope

The objective of this review was to assess the adequacy of design and operating effectiveness of the key controls established to ensure school establishments manage their school fund in accordance with the relevant procedures and financial regulations.

The audit considered the approach to managing the school fund in 2024/25 (prior year controls).

Alignment to Risk and Business Plan Outcomes

The review also considered assurance in relation to the following Corporate Leadership Team (CLT) risk categories:

- Governance & Decision Making
- Legislative & Regulatory
- Fraud & SOC
- Financial & Budget Management
- Reputational.

Business Plan Outcomes:

- Attainment, achievement, and positive destinations are improved for all with a particular focus on those in poverty.

Limitations of Scope

The following areas were excluded from scope:

- DSM budgets, except for transfers to/from the School Fund where applicable. DSM budgets will be considered for a future audit.

Reporting Date

Testing was undertaken between 14 August 2025 and 3 November 2025.

Audit work concluded on 3 November 2025, and the findings and opinion are based on the conclusion of work as at that date.

Findings and Management Action Plan

Finding 1 – Risk Management and Fraud Awareness

Finding Rating	High Priority
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Risk Management

School management is devolved to individual schools and headteachers, but schools do not have their own risk registers and instead risks for schools are captured by wider Education Services operational and strategic risk registers. Due to the different approaches to managing the school fund within individual schools, and associated financial risks identified in some school establishments, there may be unknown risks which are currently unidentified and unmitigated.

Fraud awareness

The Council's has a [duty to prevent fraud and serious organised crime](#), and has committed via its [Fraud Prevention Policy](#) to create an anti-fraud approach, culture, and maintaining high ethical standards in its administration of public funds, to ensure that funds for the benefit of pupils are safeguarded. Learning is available on the Orb and MyLearning Hub on these topics, including core learning, but schools-specific training on fraud is not in place, and key officer essential learning logs in schools do not include the Council's fraud guidance.

Following a potential fraud incident in January 2025, Internal Audit shared advice and a toolkit with Education Services who stated their intention to develop a fraud toolkit for schools. As of November 2025, this work has not yet been completed. As school Business Managers are responsible for significant DSM budgets, management of the school fund, and cash and banking controls, a strong understanding of fraud risk would further enhance existing controls.

Risks

- **Financial and Budget Management** – financial risks may not be known or have mitigating actions agreed
- **Regulatory and Legislative Compliance** - potential for fines and legal action resulting from non-compliance with laws and regulations
- **Governance and Decision Making** - management decisions could be uninformed without a systematic approach to identifying and assessing risks
- **Fraud and Serious Organised Crime** - financial loss due to internal or external fraud, theft of assets (cash, IT equipment, etc.).

Recommendations and Management Action Plan: Risk Management and Fraud Awareness

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
1.1	Each school should have a risk register which details relevant risks for the school establishment including consideration of specific financial and fraud and serious organised crime risks. The register should be aligned to the Council's risk management framework and should be reviewed by schools SMT at least quarterly, with risks escalated to the Education Risk Register where required.	Whilst the recommendation is for individual risk registers to be at school level, the risk registers at Head of Education will capture key themes of fraud and serious organised crime risks. These align to the Council's risk management framework.	Corporate Director – Children, Education & Communities	Head of Education & Early Years, Parents & Operations Head of Education (Inclusion)	30/06/2026

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
				Head of Education Quality Improvement & Broad General Education Head of Education & Curriculum & Senior Phase Head of Wider Achievement & Life Long Learning	
1.2	Mandatory fraud awareness training should be included as part of core learning for all officers responsible for finance in schools in line with the Council's approach to preventing fraud. Focussed training and examples should be provided for specific roles, for example Business Managers and Headteachers.	Alongside the council wide essential learning on fraud, we will ensure it is included into the Essential Learning framework for Education. Development of scenarios for schools to consider preventing fraud.		Quality Improvement Education Officer Senior Education Officer Operations Manager	30/06/2026
1.3	There should be regular communications to Headteachers, Business Managers, and other relevant administrators within schools on fraud and serious organised crime. This should include real-life scenarios which impact schools and fraud/prevention and detection techniques.	Will be added into Self Assurance Audit. Will have regular communications in our Education Operations Newsletter.		Operations Managers	30/06/2026

Finding 2 – Procedures and Training

Finding
Rating

High Priority

Clearly documented procedures and robust training is essential for BMs and other school admin officers who have wide roles and responsibilities, ensuring the approach to managing the school fund is consistent and aligned with policy.

School Fund Procedures

The 'Management of the School Fund' procedure on the Orb sets out a formal framework and practical instructions for Head Teachers, Business Managers, and School Fund Committee members. The document has not been reviewed since December 2014, and so does not reflect developments since then, such as the adoption of the Pebble and ParentPay systems.

Training

Pebble system and Management of School Fund procedure document e-learning is available via myLearning Hub, but not all relevant officers have completed the training. Additionally, the training materials on MyLearning Hub contain a visual representation of the system which differs from the system currently used by officers, which can cause confusion.

There are no central controls which confirm completion of role-specific learning by officers who deliver financial functions within schools, including Pebble system training and financial procedures.

High turnover in BM and other school admin roles creates additional challenges for central Education Services, as this adds workload in recruitment, inductions, training, and providing ongoing support to schools in the interim while roles are vacant. This limits key officers' ability to provide dedicated 1-1 training and support where it is needed.

Risks

- **Financial and Budget Management** – inconsistent and incomplete training leading to ineffective and inconsistent practices
- **Regulatory and Legislative Compliance** – increased risk of non-compliance with financial rules or legislation
- **Fraud and Serious Organised Crime** – inconsistent processes increase the risk of fraud and serious organised crime.

Recommendations and Management Action Plan: Procedures and Training

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
2.1	The School Fund procedure should be reviewed and updated to reflect current systems and practices, including the use of Pebble and ParentPay. The procedure should be agreed by all relevant service areas, including Education Services and Finance, and include a regular review schedule which is adhered to.	Review the procedure regularly on a 3 year basis.	Corporate Director – Children, Education & Communities	Finance and Resources Officer Senior Accountant Operations Support Officer	31/08/2026
2.2	Management of School Fund training materials on the Orb and MyLearning Hub should be updated and enhanced to ensure they provide clear	Ensure clear guidance and signposting to Pebble website support guidance		Operational Support Officer for Schools and Early Years	30/06/2026

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
	guidance on the expectations of all responsible officers, especially regarding the use of Pebble.	and instruction on how to book Pebble training.			
2.3	A central process should be introduced to regularly monitor the completion of training.	Regular Pebble health check.		Operations Manager Operational Support Officer	30/06/2026

Finding 3 – Compliance with Procedures

Finding Rating	High Priority
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Although 2 of the sampled 12 schools fully complied with the Management of the School Fund procedure, and all schools had records of transactions and supporting documents, some instances of non-compliance were noted across the other schools, including:

- there is no formal School Fund Committee in 10 schools, leading to limited assurance over governance and oversight of school fund usage (see Finding 5)
- 4 schools are not maintaining a running balance of their school fund as they are not using the Pebble system, which means that they cannot perform bank reconciliations
- the School Fund procedure requires an annual ‘audit’ of financial statements by an independent officer within each school to verify that financial controls are effective. However, this task is not being performed. Officers advised this is due to lack of confidence about qualifications, skills, and accountability to perform such a task
- the Council’s Finance team are responsible for ensuring stewardship of school funds is in line with Council’s financial rules and standing orders, and should perform sample scrutiny of school funds to satisfy compliance with school fund policy. This has not been done since 2014 (see Finding 5)

- 2 school fund transactions were identified which were not clearly for benefit of pupils. The Management of the School Fund procedure states that the fund should be “for the benefit for the children in school” and provides some examples of what the fund cannot be used for. However, the definition does not provide sufficient clarity on what the fund can be used for, and so is open to misinterpretation.

Additionally, there are no controls in place to confirm that key documents, procedures, and processes are complete and up to date prior to a business manager leaving their post. The time taken to advertise, interview, and recruit new BMs can result in key knowledge and information being lost before a proper handover can occur.

Risks

- **Financial and Budget Management** - inadequate controls over bank accounts can expose the school to potential error or fraud, or unauthorised or inappropriate purchases, resulting in direct financial loss
- **Reputational** – the misuse of school funds can damage reputation and lead to a loss of trust among students, parents, and the wider community
- **Fraud and Serious Organised Crime** - poor records increase the likelihood of fraudulent activities going undetected, such as financial mismanagement, or misuse of funds due to inadequate monitoring.

Recommendations and Management Action Plan: Compliance with Procedures

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
3.1	Following agreement of revised procedures, communications should be issued to schools to provide clear instruction that all the requirements of the Management of the School Fund procedure should be followed in all schools. Specifically:	Clear communications through HT and business managers meetings and Education Operations Newsletter. Whilst schools currently maintain a running balance, they will now submit a monthly return. The procedure currently sets out this aspect. Peer review/issue with capacity	Corporate Director – Children, Education & Communities	Operations Manager Operations Support Officer Devolved Finance and Resources Officer	30/06/2026

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
	<ul style="list-style-type: none"> all schools should maintain a running balance of their school fund, and bank reconciliations should be performed regularly in line with the requirements of the Management of the School Fund procedure in line with the procedure, an annual 'audit' should be performed by an independent officer within each school to verify that financial controls are effective and that improvement actions are documented and tracked to completion a central check should be performed to confirm completion of the annual audit and to ensure any improvement actions are completed. 	the monthly checklist/spot checks will provide assurance.		Operations Support Officer	30/06/2026
3.2	The definition of what constitutes " <i>for the benefit for the children in school</i> " should be reviewed and revised as necessary, to provide better clarity and consistency for officers. The Management of the School Fund procedure should then be updated to reflect this new guidance, supported by clear communications.	A review of the procedure as set out in 2.1.		Finance and Resources Officer Senior Accountant Operations Support Officer	30/08/2026
3.3	A process should be designed which is triggered by a business manager resigning from their post, and should include checks and balances which confirm that key processes, procedures, and documentation are up to date, allowing for an improved handover to the incoming BM.	Follow Leavers checklist from HR with additional sections for BM tasks which will include financial checks. Ensure HT are aware they must inform the EOT asap as soon as their BM resigns. Note the challenges in this if BM resigns over a holiday period.		Operations Manager Operational Support Officer	30/06/2026

Finding 4 – System Use and Cash Management Practices

Finding Rating	Medium Priority
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Digital solutions for cash management processes are crucial for ensuring consistency and accuracy of approach, reducing errors, and improving financial security and management across 124 schools. Digital solutions also provide better visibility into cash flow, and enhance risk management.

Use of the Pebble system

Use of the Pebble cash management system was inconsistent across 12 schools visited, with 4 schools using manual processes to monitor the school fund. As stated in Finding 3, this has led to school fund balances not being tracked, and bank reconciliations not being performed.

There is no specific requirement for schools to use Pebble, but its adoption across all schools would improve consistency of practice and allow for better alignment to the Management of the School Fund procedure.

Cashless schools

Education Services decided to introduce cashless schools in September 2025, as well as digital solutions to bank authorisations, payments, and record

keeping. This is currently being rolled out across all schools and will improve the management of school fund risks.

Some schools noted challenges with depositing cash and cheques after the closure of several Royal Bank of Scotland branches across the city. This has led to increased time required to travel to branches. The adoption of cashless schools will, however, remove this issue.

Risks

- **Service Delivery** – inefficient practices could lead to a reduction in the quality of service provided
- **Financial and Budget Management** - inadequate controls over financial processes can expose the school to potential error or fraud, or unauthorized or inappropriate purchases resulting in direct financial loss
- **Fraud and Serious Organised Crime** - poor records increase the likelihood of fraudulent activities going undetected, such as financial mismanagement, or misuse of funds due to inadequate monitoring.

Recommendations and Management Action Plan: System Use and Cash Management Practices

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
4.1	Education Services should consider mandating the use of the Pebble system in all schools, in order to improve financial management practices, and consistency of approach.	Finance Board to sign off that the use of Pebble system is mandatory in all schools. Communications from Service Director to all HT and BMs referring to the procedure.	Corporate Director – Children, Education & Communities	Service Director for Education & Chief Education Officer Finance and Resources Officer Senior Accountant Operations Support Officer	30/08/2026

Finding 5 – Governance, Oversight, and Assurance

Finding Rating	High Priority
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Roles and responsibilities

Business Managers (BMs) and other school admin officers within schools cover a broad range of responsibilities, including but not limited to:

- budgetary and financial management
- coordinating all personnel practice within the school, including disciplinary and grievance, sickness absence, job specifications, and recruitment
- line management of all support staff and services including staff training, development, and management of the admin-based computer systems used by staff (excluding special schools)
- facilities management coordinator
- responsible for the health and safety of all school users and visitors, as well as the building itself
- provision of management information.

At the schools sampled, some BMs stated that they often do not have sufficient time to discharge their duties effectively, and in line with the requirements of the Management of the School Fund procedure.

Local governance and oversight

The Management of the School Fund procedure requires schools to set up a formal School Fund Committee, in order to provide oversight of the Fund. The Committee should have membership including a Chairperson (the Headteacher), a Treasurer (member of the school staff), and other stakeholders including parents. Only 2 out of 12 schools sampled had an established, formal School Fund Committee set up, with the remainder having

limited informal oversight through other forums, such as Finance Committees or management team meetings. For the 10 schools sampled which did not have a School Fund Committee in place, BMs stated that it was due to the time required and administrative burden of convening another committee.

Central governance and oversight

The Council's Finance service is responsible for ensuring that stewardship of school funds is in line with Council's financial rules and standing orders and, per the requirements of the Management of the School Fund procedure, should perform sample scrutiny of school funds. This work has not been performed since 2014, with Finance management stating that they do not have the resources to perform this work.

Risks





- **Strategic Delivery** – if all of the requirements of the Management of the School Fund procedure are not met then service to users could be diminished
- **Financial and Budget Management** – a lack of governance can lead to poor financial management and inappropriate use of resources
- **Regulatory and Legislative Compliance** - schools risk not following financial rules, or not complying with legislation such as HMRC employment status checks
- **Fraud and Serious Organised Crime** - weak governance controls create opportunities for fraud and theft.

Recommendations and Management Action Plan: Governance, Oversight, and Assurance

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
5.1	The roles and responsibilities of Business Managers and School Administrators should be reviewed to ensure that they have sufficient time to	We will review and address any capacity issues that may arise from the requirement to adhere to the	Corporate Director – Children,	Head of Education & Early Years, Parents & Operations Operations Manager	30/08/2026

	fully and effectively discharge their duties, as stated in the Management of the School Fund procedure.	management of school fund procedure as part of the planned DSM review.	Education & Communities	Operational Support Officer	
5.2	As required by the Management of the School Fund procedure, School Fund Committees should be in place for all schools, with attendance from the Headteacher, a Treasurer, and other stakeholders including parents.	This will be incorporated into the monthly Finance Checklist. Communication to HT and BMs through Education Operations Newsletter.		Service Director for Education & Chief Education Officer Finance and Resources Officer Operations Support Officer	30/06/2026
5.3	Finance should ensure adequate controls are in place to provide assurance of effective stewardship of school funds in line with Council's financial rules and standing orders and per the requirements of the Management of the School Fund procedure. Specifically, they should perform sample reviews of school funds to confirm compliance with financial policies and procedures.	Ensure up to date procedures are in place and use the Education Self Assurance question set to further evidence adherence to school fund procedure.	Corporate Director – Customer and Corporate Services	Finance and Resources Officer Senior Accountant Operations Manager Operations Support Officer	30/08/2026

Appendix 1 – Control Assessment and Assurance Definitions

Control Assessment Rating		Control Design Adequacy	Control Operation Effectiveness
Well managed		Well-structured design efficiently achieves fit-for purpose control objectives	Controls consistently applied and operating at optimum level of effectiveness.
Generally Satisfactory		Sound design achieves control objectives	Controls consistently applied
Some Improvement Opportunity		Design is generally sound, with some opportunity to introduce control improvements	Conformance generally sound, with some opportunity to enhance level of conformance
Major Improvement Opportunity		Design is not optimum and may put control objectives at risk	Non-conformance may put control objectives at risk
Control Not Tested	N/A	Not applicable for control design assessments	Control not tested, either due to ineffective design or due to design only audit

Overall Assurance Ratings

Substantial Assurance	A sound system of governance, risk management and control exists, with internal controls operating effectively and being consistently applied to support the achievement of objectives in the area audited.
Reasonable Assurance	There is a generally sound system of governance, risk management and control in place. Some issues, non-compliance or scope for improvement were identified which may put at risk the achievement of objectives in the area audited.
Limited Assurance	Significant gaps, weaknesses or non-compliance were identified. Improvement is required to the system of governance, risk management and control to effectively manage risks to the achievement of objectives in the area audited.
No Assurance	Immediate action is required to address fundamental gaps, weaknesses or non-compliance identified. The system of governance, risk management and control is inadequate to effectively manage risks to the achievement of objectives in the area audited.

Finding Priority Ratings

Advisory	A finding that does not have a risk impact but has been raised to highlight areas of inefficiencies or good practice.
Low Priority	An issue that results in a small impact to the achievement of objectives in the area audited.
Medium Priority	An issue that results in a moderate impact to the achievement of objectives in the area audited.
High Priority	An issue that results in a severe impact to the achievement of objectives in the area audited.
Critical Priority	An issue that results in a critical impact to the achievement of objectives in the area audited. The issue needs to be resolved as a matter of urgency.

Appendix 2 – Areas of Audit Focus and Control Objectives

Audit Areas	Control Objectives
Risk Management	<ul style="list-style-type: none"> • risks related to the School Fund are identified, recorded and managed within school risk registers (or centrally as appropriate), and regularly reviewed to ensure appropriate mitigating actions are in place and remain effective, with escalation to education and directorate level risk committees where required. This includes consideration of fraud and serious organised crime related risks.
Policies, procedures and training	<ul style="list-style-type: none"> • policy and supporting procedures are in place which are followed and reviewed in line with the relevant legislation, guidance, or following any changes to process and practice. These include: <ul style="list-style-type: none"> ○ financial controls required of Headteachers, Business Managers, and School Fund Committee Members ○ ParentPay User Policy for parents, pupils and any other stakeholders, including how charges and remissions will be handled and signposts to where those facing poverty can seek help ○ a clear approval process which ensures segregation of duties between those responsible for managing the School Fund ○ governance arrangements between schools, School Fund Committees, and the Councils Education Service and Finance Functions • training and development requirements for officers charged with managing the School Fund are relevant, clearly understood, completed on time and effectively monitored for completion.
Record Keeping	<ul style="list-style-type: none"> • there is accurate record-keeping of all income received, expenditure incurred to/from the School Fund, and tax implications including detailed information on each transaction. • a balance sheet or similar reporting is used to monitor the status of the School Fund, including balances owed to/from the School Fund • transactions can be clearly identified as being <i>'for the benefit of pupils'</i> and there is openness and transparency from the school including communication channels with stakeholders.
Cash, Banking, and Procurement Controls	<ul style="list-style-type: none"> • best practice is followed to manage incoming and outgoing cash, cheques, payment cards, online bank payments, etc., ensuring that fraud and error is prevented and detected (e.g. timely record keeping, and approvals) • goods and services that are not covered by an existing contract comply with the Contract Standing Orders • there are controls in place to manage user access to the Pebble system, ensuring only authorised users can access and amend School Fund data.
Local and Central Oversight	<ul style="list-style-type: none"> • School Fund Committees are effective at governing the School Fund, including challenging its use where appropriate, and demonstrating best value/maximising the benefit for the pupils • there is an independent review of each School Fund, providing assurance over the accuracy of reporting and balances. Assurance includes an assessment of the School Funds compliance with relevant Financial and Public Sector legislation, such as the requirement for the School Fund to only be used for the benefit of pupils • central monitoring and reporting is in place to oversee schools' compliance with the requirements of the School Fund.
Information Governance	<ul style="list-style-type: none"> • information governance risks for the School Fund are clearly understood, and effective controls have been established to ensure adherence to relevant Council policies and procedures.