



# Key Issues for Discussion Document

## Farmor's School ("The Trust")

For the Year ended 31/08/2024



Our Ref: BSFA5696/RS  
Your Ref:  
Date: 6 November 2024



**PRIVATE & CONFIDENTIAL**

The Board of Trustees  
Farmor's School  
The Park  
Leafield Road  
Fairford  
Gloucestershire  
GL7 4JQ

Dear Sirs and Mesdames

**Farmor's School – Key Issues for Discussion Document**

We are pleased to attach our Key Issues for Discussion Document. This report, which is designed to be the basis of discussion when we meet, summarises our audit conclusions, highlights the key findings arising from our work and details a number of points that we would like to discuss further with you.

We have initially discussed the contents of our report with management and have incorporated their comments where relevant.

This report is intended to be solely for the information and use of the Trustees and those charged with governance of the Trust and should not be shared with anyone beyond this Trust without our prior approval.

We would like to take this opportunity to thank the finance team for the co-operation and assistance afforded to us during the course of the audit.

Yours faithfully

**BISHOP FLEMING LLP**

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- Management letter points and internal control systems
- Draft letter of representation, summary of audit adjustments and unadjusted audit differences (provided separately)

# 1. Introduction and executive summary

## Introduction

The Key Issues for Discussion Document ("KIDD") has been prepared for the benefit of discussion between Bishop Fleming and Farmor's School (the Trust).

The purpose of the KIDD is to highlight the key issues affecting the audit of the Trust and the preparation of its financial statements for the Year ended 31/08/2024.

The document is also used to report to management our mandatory requirements as set out in International Standard on Auditing (UK & Ireland) 260 (ISA 260).

## Audit status

Our audit work was carried out in accordance with our audit plan in response to the perceived audit risks, and no matters were identified which required us to change our approach and no additional risks were identified.

Our audit is substantially complete although we are finalising our procedures in the following areas:

- Review of latest management accounts/monthly finance report to consider post balance sheet events
- Approval of financial statements
- Receipt of the management representation letter
- Audit requests (will be communicated separately).

## Audit report

We anticipate issuing an unmodified audit report on the financial statements of Farmor's School for the Year ended 31/08/2024 subject to the successful conclusion of matters within this report and to receiving all outstanding information set out previously.

We have summarised our findings and conclusions in relation to the significant risks within this report.

## Regularity report

We conducted our regularity assurance engagement in accordance with the AAD. We performed a limited assurance engagement as defined in our engagement letter.

The objective of a limited assurance engagement is to perform such procedures as to obtain information and explanations in order to provide us with sufficient appropriate evidence to express a negative conclusion on regularity. A limited assurance engagement is more limited in scope than a reasonable assurance engagement and consequently does not enable us to obtain assurance that we would become aware of all significant matters that may be identified in a reasonable assurance engagement. Accordingly, we do not express a positive opinion. Our engagement included examination, on a test basis, of evidence relevant to the regularity and propriety of the Trust's income and expenditure.

We propose to issue an unmodified regularity assurance report for the period.

## Confidentiality

This document is strictly confidential and although it has been made available to those charged with governance to facilitate discussions, it may not be taken as altering our responsibilities to the Trust arising under our audit engagement letter.

This KIDD has been prepared for the sole use of the Board of Trustees, management and others of the Trust. We understand that you are required to provide a copy of the management letter section of this report to the ESFA. With the exception of this, no reports may be provided to third parties without our prior written consent. No responsibility is accepted by Bishop Fleming towards any party acting or refraining from action as a result of this report.

## **Responsibilities of the Trustees**

The trustees are responsible for the preparation of the financial statements and for making available to us all the information and explanations we consider necessary.

The matters dealt with in this KIDD came to our attention during the conduct of our normal audit and assurance procedures which are designed primarily for the purpose of expressing our opinion on the financial statements of the Trust and providing a limited assurance conclusion on regularity.

In consequence our work did not encompass a detailed review of all aspects of the systems and controls and cannot be relied upon necessarily to disclose defalcations or other irregularities, or to include all possible improvements in internal control that a more extensive special examination might reveal.

We would be pleased to discuss any further work in this regard with trustees and/or management.

## **Audit Materiality**

In carrying out our audit work we considered whether the financial statements are free from 'material misstatement'.

Materiality is an expression of the relative significance of a particular matter in the context of the financial statements as a whole. An item will normally be considered material if its omission would reasonably influence the decisions of those using the financial statements.

The assessment of whether a misstatement is material in the context of the financial statements is a matter of professional judgement and will have regard to both the amount and the nature of the misstatement. Thus different materiality levels may be appropriate when considering different aspects of the financial statements.

The assessment of whether a misstatement is material in the context of the regularity assurance report has been evaluated in the same way as the "true and fair" audit of the financial statements, as noted above.

## **Review of Accounting Policies**

We have reviewed the accounting policies adopted by the Trust and have found them to be appropriate and applied consistently.

## **Changes to Accounting Policies**

There have been no changes to accounting policies since the previous period.

## **Representation Letter**

A draft representation letter has been separately provided to you.

## **Unadjusted items**

We do not deem the total of the unadjusted items to be material to the financial statements. Within our letter of representation, we request you confirm that the effects of not recording such misstatements identified in the financial statements are, both individually and in the aggregate, immaterial to the financial statements of the Trust as a whole.

## **Audit adjustments**

During the course of our audit, we have identified adjustments which have been processed in the financial statements, on the agreement of management. These are attached to the letter of representation.

## **Independence**

The FRC Ethical Standard and ISA 260 requires us to communicate with you on a timely basis on all significant facts and matters that bear upon our independence and objectivity. The aim of these communications is to ensure full and fair disclosure by us to those charged with governance on matters in which you have an interest. We are not aware of any relationships that, in our professional judgment, may reasonably be thought to bear on our independence or the objectivity of the audit engagement team.

We confirm that in our professional judgment, Bishop Fleming is independent within the meaning of regulatory and professional requirements and the objectivity of the audit engagement partner and audit staff has not been compromised. We consider that our independence in this context is a matter that should be reviewed by both you and ourselves. It is therefore important that you consider the facts of which you are aware and come to a view. Should you have any specific matters that you wish to discuss, please contact us.

Details of all the threats and related safeguards relating to non-audit services provided were included in our planning report.

### **Statutory audit and regularity report**

Our work was planned to provide a focused and robust audit, so as to:

- Provide an independent opinion as to whether the financial statements give a true and fair view; and;
- State whether the financial statements have been properly prepared in accordance with the Companies Act 2006 and Academies Accounts Direction 2018 to 2019 (AAD).

Our work was also planned to provide a “limited assurance” report on regularity in accordance with the AAD.

Due to the inherent limitations of an audit, together with the inherent limitations of internal control, there is an unavoidable risk that some material misstatements may not be detected, even though the audit is properly planned and performed in accordance with ISAs.

When planning our audit work, we sought to minimise the risk of material misstatements occurring in the financial statements. To do this, we considered both the risk inherent in the financial statements themselves and the control environment in which your Trust operates. We then used this assessment to develop an effective approach to the audit.

Based on our knowledge of the Trust, we assessed the risks to the Trust and planned our audit with regard to these risks. The significant risks identified in connection with the audit are summarised later in this report.

### **And finally**

Finally we would like to take this opportunity to thank your staff for the co-operation we have received throughout our audit. If there are any further matters which you wish to discuss concerning our audit, please do not hesitate to call us.

## 2. Key audit risks and other findings

### 1 Significant risk: Management override of controls

#### Summary

We are required by auditing standards (ISA 240) to consider fraud and management override of controls to be a significant risk for all audits as no matter how strong a control environment, there is the potential for controls to be overridden or bypassed.

#### Work done and conclusion

To address this risk, we have considered:

- Reviewed the reasonableness of accounting estimates such as useful economic lives of assets;
- Tested journals with a material impact on the results for the year;
- Considered a sample of other journals with key risk attributes.

We have not identified any material errors from our work.

### 2 Significant risk: Fraud in income recognition

#### Summary

There is also a presumption under auditing standards that the risk of fraud in revenue recognition is considered to be a significant risk area.

#### Work done and conclusion

To address this risk, we have:

- Documented and validated the control environment for income and debtors using walkthrough testing;
- Performed substantive procedures over income to address this risk;
- Considered income journals as part of our work on fraud risks documented above.

We have not identified any material errors from our work.

### 3 Significant risk: Going Concern

#### Summary

There is a risk that the basis of going concern is applied to the accounts incorrectly as the school has previously had a b/fwd deficit and there is uncertainty around future funding and continued operation for the next 12 months.

#### Work done and conclusion

To address this risk, we have:

- Taken a fully substantive approach to testing and placed no reliance on controls.
- We will perform a review of forecast P&L, balance sheet and cash flow which covers the 12 months post-signing of accounts
- We will question the assumptions used in these forecasts and review post year end management accounts.

We have not identified any material errors from our work.

### 4 Regularity risk: Unauthorised transactions

#### Risk

Risk of unauthorised activities or expenditure being incurred

#### Work done and conclusion

Throughout the audit, consideration has been given to any transactions reviewed or identified. This includes transactions discussed at board level, or as selected in our detailed expenditure testing.

We have not identified any material errors from our work.

### 5 Regularity risk: Related parties

#### Risk

Risk of related party transactions occurring and not being detected

#### Work done and conclusion

We have reviewed the register of interests, declarations forms, board minutes and enquired with management. This has also been considered in connection with our detailed expenditure testing.

We have not identified any material errors from our work.



## 6 Regularity risk: Unauthorised borrowings or leases

### Risk

Risk of unauthorised borrowings and leases being in place

### Work done and conclusion

We have reviewed the bank confirmation letter for any bank borrowings, reviewed the balance sheet for any other borrowings, and reviewed the processes for new leases in the year to ensure correct consideration was given as to whether it was a finance lease or not before entering into it.

We have not identified any material errors from our work.

### 3. Other audit and financial reporting matters

#### FRS 102 LGPS pension valuation

The Trust has received its FRS102 pension valuations the Trust. The results of which have been summarised below (000's):

	B/Fwd £	Income	Pension expense	Actuarial (gain) / loss	C/Fwd £
Gloucestershire Pension Fund	(228)	-	54	174	-

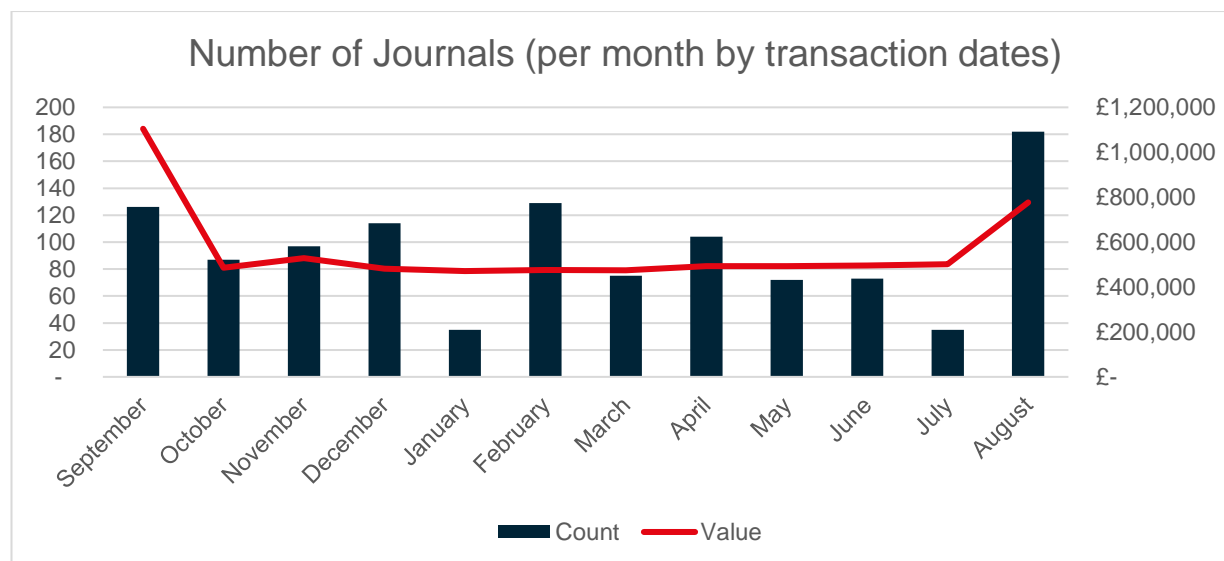
The Trust has opted to use the standard assumptions offered by the actuary in the valuations provided.

#### Management comment

We are optimistic that the surplus position has a positive influence on the triennial actuarial valuation and effects a reduction in future employer contributions.

## 4. Audit insights

### No. of Journals (Per month by transaction date)



This graph represents the number of journals posted each month.

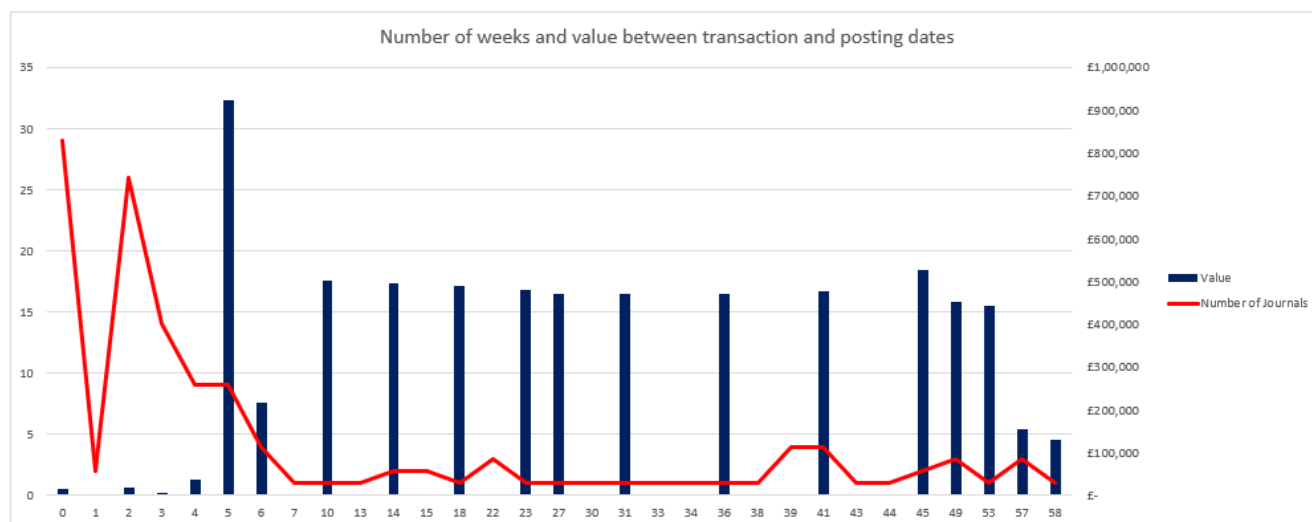
We would typically expect that journal transactions per month remain broadly consistent throughout the year due to preparation of monthly management accounts. Peaks are expected in September and August for opening and closing adjustments.

As you can see, for the majority of the year a consistent number of journals and value of journals are posted each month, with the exception of January, February, July and August. The small value of journals in January and July were due to low activity, but, in terms of monetary postings was in line with the rest of the year. February saw a large number of journals but monetary value was in line with the rest of the year. August saw increase in number of journals and monetary value due to year-end postings and adjustments to debtors and creditors.

The current year trend closely resembles that of the prior year, with the exception of January and July. In the prior year the peak value was also seen in August due to year-end journals.

From this analysis, no further risk has been presented.

## Posting gap



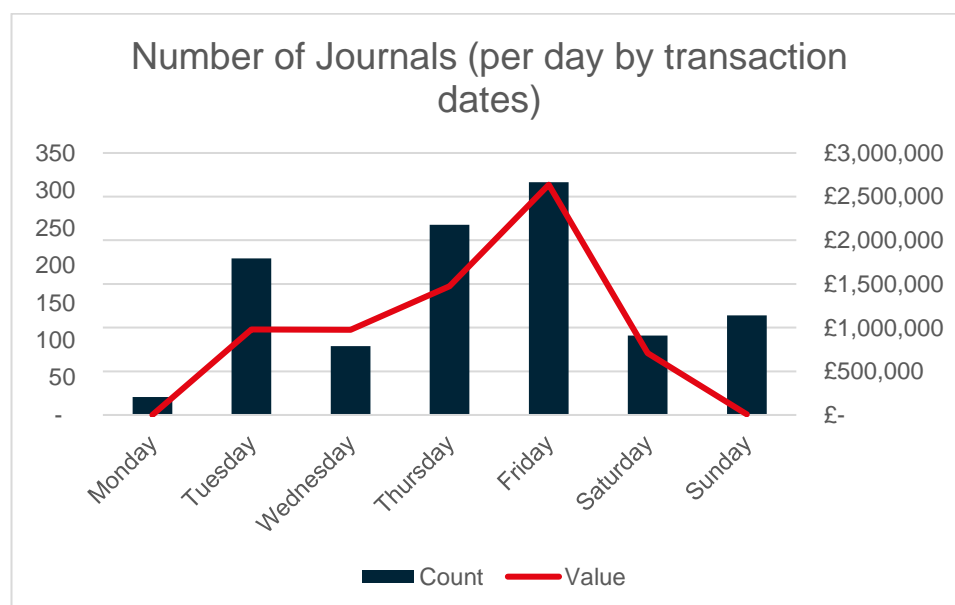
The graph above demonstrates the gap between the date the journal is physically posted, and the effective date on the finance system. We would expect most journals to be posted within 0-1 months of the effective date to ensure management accounts are accurate. It was noted that there were some delays in some journal postings, however the value was relatively low.

The peak in value of the graph in week 5 relates to a large amount of year-end adjustments posted in early October during the prior year audit fieldwork time. Also during this time there were material opening balance adjustments for deferred income posted.

The peaks seen through to week 53 relates to payroll adjustments for backdate pay rises posted to each month. The value each month ranged between £450-£500k.

The peaks in weeks 57 and 58 relate to deferred and prepayment opening balances and opening funds balances not adjusted until October 2024.

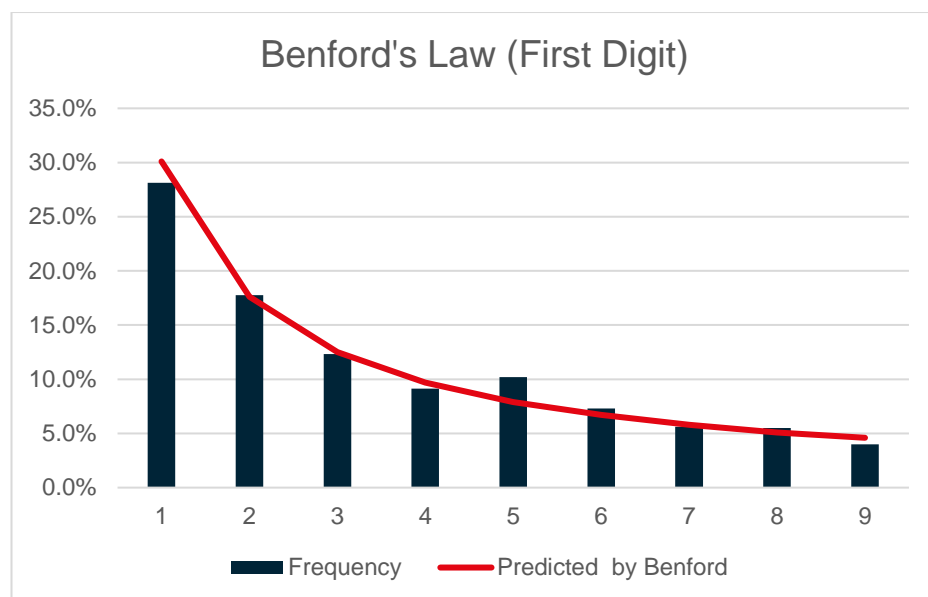
## Timing of journals



This graph demonstrates the days on which journals are posted. As expected, the majority of the journals are posted between Monday and Friday, the standard working week. However, a number of journals are posted on Saturday and Sunday as well.

The majority of these journals are due the year-end falling on a Saturday and a number of months ending on Sunday. We recommend the reason for weekend postings is investigated as it could impact on the quality of financial governance and may indicate under-resourcing in the finance team.

### Benford's Law Review



Benford's Law states that in a natural collection of numbers, the leading significant digit is likely to be small and follow a logarithmic curve. This is analysed to assess whether there is a heightened risk of fraud due to unusual data being posted that is not in line with what is deemed a normal data set.

From the data set of all journals posted during the year, it was noted that only one of the variance exceeded 1%. Digit 5 showed a 2.3% variance. Upon further investigation it noted these transactions mainly relate to reprographic expenditure which is small in value at £1,8k as well as postings to pensions and payroll.

From this analysis, no further risk has been presented.

### Key Word Analysis

We have also performed a review of key words contained within journal descriptions. The majority of those identified related to month end adjustments, bank and intercompany account transfers and correction of journals posted

# Appendix

# Management letter points and internal control systems

The Trust's management is responsible for the identification, assessment and monitoring of risk, for developing, operating and monitoring the systems of internal control and for providing assurance to the Board that it has done so.

In accordance with the terms of our engagement we have not provided a comprehensive statement of all issues which may exist in the accounting and internal control systems or of all improvements which may be made, but outline below our observations arising from the audit, none of which are considered significant.

We would be pleased to discuss further work in this regard with the Board.

## KEY:



*Financial* - Observations refer to issues that are so fundamental to the system of internal control that management should address immediately to minimise the risk of a material misstatement within the financial statements.

*Governance* – Observations that are fundamental to good governance and should be addressed immediately to minimise the risk of governance failings.



*Financial* - Observations refer mainly to issues that have an important effect on the system of internal control and, if left uncorrected could potentially lead to a material misstatement within the financial statements.

*Governance* – Observations that are important to good governance and should be addressed to minimise the risk of governance failings and to help improve procedures.



*Financial* - Observations refer to issues that would, if corrected, improve internal control in general and engender good practice, but is unlikely to have a material impact on the financial statements.

*Governance* – Observations that if addressed would help to improve and embed good governance practices but is unlikely to lead directly on its own to governance failings.



Observations made in the previous year have been resolved.

Summary of progress against points raised.

Risk Rating	2024	2023
	0	0
	2	5
	2	2
	3	NA

## Internal financial controls


Our review of the Trust's system of internal control is carried out to assist us in expressing an opinion on the financial statements of the Academy as a whole. This work is not primarily directed towards the discovery of weaknesses or the detection of fraud or other irregularities (other than those which would influence us in forming that opinion) and should not therefore be relied upon to show that no other weaknesses exist. Accordingly, we refer only to significant matters which have come to our attention during the course of our normal audit work and do not attempt to indicate all possible improvements which a special review might reveal.

The following table summarises our significant control observations together with any recommendations we have for possible improvements which could be made.



## Your comments

We would be grateful if you would enter your comments against each point under the "management response" header of the management letter point section and return it to us in due course. The management letter section of this KIDD letter will be submitted to the ESFA with the Financial Statements.

## Current Year Matters

Point 1 Keeping up to date operating lease schedule	
	
During the testing of standing orders and direct debits an undisclosed lease was found that was not detailed in the lease schedule provided. The lease was then provided and added to the operating lease commitments note.	<p><b><u>Recommendation</u></b></p> <p>We recommend keeping a schedule of operating leases and checked regularly for any coming to an end that may require new leases.</p> <p><b><u>Management comment</u></b></p> <p>Completed via contract spreadsheet</p>

## Prior Year Matters - Unresolved

Point 1 Schools trips not tendered appropriately	
 <span>Prior Year Rating: </span>	
<p>In the prior year it was noted during testing that a school trip purchased to the cost of £56k was not appropriately tendered for. One quote was received but as per the finance policy a tendering process should be entered for purchases over £25k.</p> <p><b>Current year update</b></p> <p>In 2024 it was noted that there were more school trips but as at the clearance meeting the analysis of the trips was still being undertaken. It had been brought to our attention that the D of E provider was appointed on a 3 year deal in 2022 and the last leader had left and taken access to quote information with them. Management now ensures 3 quotes are received and appointed a</p>	<p><b><u>Recommendation</u></b></p> <p>Ensure that the appropriate tendering processes are being followed in line with the finance policy.</p> <p><b><u>Management comment</u></b></p> <p>Noted and will enforce</p>



new D of E trip leader in the assistant head who wants to set a precedent.

## Point 2 Fixed Asset Register not maintained



Prior Year Rating:



It was noted that the fixed asset additions purchased in the prior year had not been included on the year end fixed asset register. Alongside this, the depreciation for 22/23 had not been calculated.

### Current year update

The same has been noted for 23/24. It was also noted that the minibuses had been incorrectly posted to prepayments rather than to additions.

### Recommendation

Ensure that the fixed asset register is being maintained appropriately throughout the financial year.

### Management comment

Noted

## Point 7 Accounting system issues



Prior Year Rating:



*In July 2022 the Trust changed its accounting system to Xero from PS Financials. Having begun the audit it became apparent that the trial balance obtained from the new Xero system was not correct, with significant issues being identified both in the migration of data from PS Financials and postings made to Xero since it came into use. This was most apparent with balance sheet nominal codes which did not include the migration of historic data and significant variances with opening reserves and meant that Trustees were not provided with accurate balance sheet monthly information.*

*The migration of data and posting of accounting entries into the new system was reviewed and re-posted into Xero, with a second trial balance being produced. This has been tested and appears to include the migration of the correct closing balance sheet position from the old financial system, although some adjustments have been posted as part of our audit to ensure the opening reserves position agrees to the prior year statutory accounts.*

*It became apparent in the prior year that there were duplicated postings leading to errors in the opening balances and other balance sheet figures within the 2023 year. This was led by postings performed by a service organisation, however, there were further postings performed by the finance team that lead to discrepancies.*

### Current year update

### Recommendation

We recommend that the finance staff ensure they familiarise themselves with Xero software to ensure that all accounting entries in the future, in particular in relation to the balance sheet codes, correctly posted to the system.

### Management comment

Noted

It was noted in journals testing and testing of balance sheet items (accrued income and accruals) that some historical postings had not been reversed and so have been adjusted for.

## Prior Year Matters – Resolved

### Point 1 Unsigned contracts



Prior Year Rating:

It was noted through prior year wages testing that there were multiple employees without signed contracts held on site.

#### Current year update

During wages testing it was noted all contracts selected had been signed.

#### Recommendation

Signed contracts for each employee should be held on site. Ensure that both the employee and Farmor's School have a copy.

Management comment  
completed

### Point 2 Incorrect income posting description



Prior Year Rating:

It was identified through prior year income testing that a material balance of income was posted with incorrect description. The income related to SSG and MSAG however, the description was listed as Recovery Premium.

#### Current year update

No issues had been noted in the current year testing.

#### Recommendation

Ensure that an income reconciliation is completed each month for ESFA funding as per the allocations and Xero. This will help to highlight any discrepancies.

#### Management comment

Completed

### Point 3 Income schedules not maintained



Prior Year Rating:

Various schedules relating to income had not been maintained/kept for the prior financial year – this includes trading income and lettings income. This has resulted in some overdue payments that have not been chased.

#### Current year update

#### Recommendation

We would recommend keeping a schedule outside of the accounting software of each income stream and reconciling these schedules each month. This will insure that income is received in a timely manner and income in the accounts is accurate.

No issue noted in the current year.

**Management comment**

Completed

This document is confidential to: Farmor's School



**ICAEW**  
CHARTERED  
ACCOUNTANTS



**KRESTON**

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