

AUDIT AND RISK MANAGEMENT COMMITTEE

Minutes of the online meeting held on 18 November 2025 at 4.30pm

Present physically:

Present virtually: D Bicker, EEGT Trustee
J Wakelam, EEGT Trustee, **Vice Chair**
J Wyn-Beer, Committee Member
P Frazer-Gale, Committee Member
R Attwell, EEGT Trustee, **Chair**

In attendance: A Brewster, Group Director of Finance
A McGarel, CFO
B Pritchard, Scrutton Bland
G Kerkham, Larking Gowen (part)
H Stewart, Larking Gowen (part)
J McDonnell, Trainee Clerk and EA to Governance Professional
L Carroll, Group Director of Risk
S Gales, Governance Professional
S Hope, Group Director of Compliance and GDPR

Apologies: L Cox, Scrutton Bland
R Inman, EEGT Trustee
N Savvas, CEO

Absent:

1. Declaration of Interests and Apologies for absence

J Wakelam declared her role as a Governor of West Suffolk College, P Frazer-Gale declared his role as a member of West Suffolk College's Audit and Risk Management Committee.

No other conflicts of interest in relation to the items of the agenda were declared.

Apologies were received from L Cox, R Inman and N Savvas, CEO and accounting officer.

2. External Auditor's Audit Findings Report

Members received and considered the report.

G Kerkham explained that the report reflects a static point in time and confirmed that, since this report was issued, a further updated report has been issued and that many of the 'finalisation' points have now been addressed.

G Kerkham outlined the external audit and assurance processes and commended the clean audit findings especially given the recent merger with SENDAT and Exning joining the Trust. G Kerkham summarised and presented the key findings of the audit and explained the rationale for the adjustments.

G Kerkham noted that there were no modifications to the financial statements audit report or the regularity report, and commended the clean, unqualified reports.

G Kerkham explained the account adjustments in relation to the assets/liabilities of the SEND schools and confirmed that these are below the materiality threshold. Members sought clarity about how the desktop valuations were calculated and the reliability of the calculations. G Kerkham explained the methodology used. Members queried if there is RAAC at the SEND schools. The CFO explained that we are not aware of any and confirmed that we have completed property surveys. Members queried how Exning is due to be treated in the accounts. G Kerkham explained that they are covered in section

Action

27 of the accounts. Members queried what valuation was used for Exning. G Kerkham confirmed that it was a professional valuation obtained by Concertas on behalf of the Local Authority as part of its academisation.

Members discussed 'pension contribution' (the section 25 of the accounts) and queried, given the recent merger with SENDAT and Exning joining the Trust, how the pension contribution had been valued. G Kerkham explained the accounting treatment used as standard practice within the education sector.

Members queried how Stanton joining the Trust will be reported in the accounts. G Kerkham explained that this is noted in the 'post balance sheet events' in section 33 of the accounts.

Members queried the reasons for the VAT adjustment. G Kerkham and H Stewart explained that that this arose from a transaction with West Suffolk College. A Brewster explained that it was an invoicing error and confirmed that corrections to processes will be made.

G Kerkham advised that the Executive review and clarify the wording within the Trustees report relating to the 'reserves policy' and the 'principal risks and uncertainties'. Members discussed the proposed changes and asked the CFO to review and update.

CFO

G Kerkham explained the rationale for the two 'minor control deficiencies and recommended enhancements in control efficiency' and confirmed that the implications were immaterial.

Members requested that the Management Representation letter be updated to reflect the Trust's new name - EEGT.

Larking Gowen

G Kerkham discussed the implications of newly updated DfE regulation (e.g. novel, contentious and repercussive transactions [NPR] and reserves guidance). The CFO confirmed that we are liaising with the DfE about a NPR and A Brewster updated on discussions with our bank to improve returns from interest rates.

Larking Gowen thanked the Trust and the Finance team for their support of the audit.

Members thanked Larking Gowen for the thorough audit findings report and the Finance team for their support of the external audit.

Members reflected that there is a potential 'familiarity threat' relating to G Kerkham remaining the lead audit partner beyond this academic year and queried how Larking Gowen intend to mitigate this risk. G Kerkham summarised how Larking Gowen have internally assessed issues around familiarity and objectivity. G Kerkham explained that from the 10th year, Larking Gowen consider whether there is a familiarity threat (a potential threat to independence and objectivity) and whether the firm need to switch the lead audit partner with the Trust. Larking Gowen's assessment was that, given the Trust's unique and complex relationship with West Suffolk College as sponsor, familiarity with the Trust's history and context is a *benefit* to audit quality; and therefore, propose that Giles Kerkham continue as lead audit partner.

G Kerkham informed that the Larking Gowen have mandatory safeguards to ensure that audits by the same lead audit partner beyond the 10th year remain independent and objective. G Kerkham outlined these - another very technically competent Academy specialist audit partner conducts a thorough file review and consults/challenges the audit planning, completion and finding results. G Kerkham noted that the file review in this audit (2024/25) did not contradict or change the findings, however resulted in fine point tweaks to the wordings of the finding judgements – which supports Larking Gowen's assessment that the familiarity threat is minimal. G Kerkham added that for the most technically complex parts of the audit e.g. the related party transactions with West Suffolk College and the valuations, he routinely consults with another audit partner to ensure robust judgements about regularity.

Members commended the thorough approach and queried whether file review approach would be a one-off or an annual 'familiarity threat' review. G Kerkham confirmed that it would be annual.

3. Draft 2024/25 Audited Accounts

Members received and considered the draft audited accounts provided, and the CFO summarised the key data and what the process has taken to draft these.

A Brewster informed that the draft accounts will be further proof checked to correct spelling and punctuation and confirmed that none of these should change anything material.

The CFO informed that the draft accounts will be further reviewed and updated by the Executive and presented to the Finance Committee at its meeting on 26 November 2025, ahead of being presented to the Trust Board at its meeting on 11 December 2025.

G Kerkham and H Stewart left the meeting at 5.28pm

Members asked the CFO to share the updated findings report and accounts.

CFO

Members reflected that many of our schools need significant investment to improve their estates, linked to the discussions above around the account adjustments in relation to the assets/liabilities of the schools, and queried whether our reserves policy is sufficient. The CFO agreed that our school infrastructure requires significant investment. The CFO explained that we prioritise utilisation of our annual DfE funded school condition allocation over a phased and strategically planned programme of works. The CFO added that we also explore additional grants and funds to support these improvement works, as well as work with the DfE and Local Authorities to rebuild / relocate premises where possible e.g. Priory School is due to be rebuilt and Chalk Hill is due to relocate. The CFO informed that his team closely oversee infrastructure projects, costings and impact on reserves.

4. Audit Committee's Annual Report

Members received and considered the draft Annual Report provided and A Brewster summarised the key points.

Members reflected that significant work has been undertaken to strengthen the reporting and approach of risk management and requested that section 7 be updated to reflect this.

L Carroll

Members noted the typo on page 5 about the Committee Chair in 2024/25. Members discussed who should be listed as the signatory, given the recent change of Committee Chair and the absence of R Inman from this meeting, and **agreed** that J Wakelam as Committee Vice Chair should be the signatory. A Brewster to amend the report.

A Brewster

Members **approved** the Annual Report and **agreed to recommend it to the Trust Board**, subject to the amendment above.

5. Internal Auditor's Audit Findings Report

Members received and considered the report and B Pritchard summarised the key points.

B Pritchard summarised the report and noted that in their opinion, for the year ended 31 August 2025, the Trust has adequate and effective controls in place and demonstrates effective governance across key operational areas.

B Pritchard thanked the Executive and the Committee for their support throughout the year.

Members queried the size of the education client base used for the benchmarking of recommendations. B Pritchard informed that it is circa 12 similarly sized Trusts and 15 colleges clients.

Members commended the Executive's strong performance in implementing/actioning audit recommendations, and noted the importance of continued oversight by this Committee of audit recommendation tracking.

6. Minutes of the meeting held on 7 October 2025

The minutes of the meeting on 7 October 2025 were **agreed** as an accurate record.

7. Matters Arising from meeting on 7 October 2025

Six of the ten matters arising were complete, with two ongoing and two scheduled for future meetings.

MA1 – Members received the additional cyber security assurance reports. Members queried whether the main cyber security concerns relate to all schools or to one in particular. The Governance Professional explained that cyber security is routinely reported to the Resources Committee as part of the IT report. The Governance Professional informed that the Trust is aiming to strengthen cyber security to the high and accredited status of West Suffolk College, however given the recent merger with SENDAT and with Exning and Stanton joining the Trust, there continue to be legacy concerns about the integration of the schools and making sure our systems and our staff/students are all working to the same rigorous standards; which links to the significant work we have been doing to review and update our policies.

MA2 – Members noted that the 'familiarity threat' of the External Auditors was discussed in agenda item 2. Members discussed Larking Gowen's response and **felt assured** by their proposed safeguards to mitigate the familiarity threat and **agreed in principle**, though requested that Larking Gowen outline in writing their proposed safeguards and their commitment to maintaining high standards of rigour, objectivity and independence - for the Committee to review, approve and recommend to the Board and Members.

MA5 – S Hope informed that we are awaiting further updates regarding the national Intradev SCR breach and have participated in Stone King LLP webinars and checked with our insurers. S Hope noted that he will keep the Committee updated.

MA10 – The Governance Professional informed that the extraordinary meeting to discuss the Risk Register will be scheduled for the spring term.

8. Risk Management Update

The Risk Register currently includes **0 red, 15 amber, 11 yellow** risks, with one proposed new risk (EEG00X.1 relating to not achieving budgeted surplus) and two proposed changes to risk names and/or scores.

L Carroll summarised the report and the rationale for the proposed new risk and change.

Members **approved** the Risk Register and **agreed to recommend it to the Trust Board**.

The Governance Professional informed that a recent Standard 3 visit to Chalk Hill's residential provision identified areas for improvement which, when considered in the context of it's previous Ofsted in January 2025, could represent an emerging risk. The Governance Professional informed that the Executive have created an action plan to mitigate and address the concerns raised which will be monitored by the SEND Educational Excellence Committee, though noted the Executive are currently still considering whether it should be added to the Risk Register. Members thanked the Governance Professional for keeping them informed.

9. Audit Recommendations Tracking Report

Members received and considered the tracking report which showed that of the 59 outstanding audit recommendations, 18 are due to be revisited during the Follow Up audits and 6 are considered complete by EEG.

Larking
Gowen

L Carroll noted that a new low risk recommendation and one value added point has been added in relation to the Estates audit and confirmed that the Internal Auditor's findings report will be presented to the Committee in February 2026. L Carroll informed that Internal Audits of West Suffolk College's Higher Education provision, and of the Group's Safeguarding and Prevent practices are underway this term and will also be presented to the Committee in February 2026.

L Carroll noted that in response to the medium risk recommendations relating to the Business Continuity Plan, we are arranging some dates to test our response plans and invited governance members to attend/observe/participate. Members asked L Carroll to share the proposed date with the Committee.

L Carroll

10. Policies

- i. Anti-Bribery Policy**
- ii. Appropriate Policy**
- iii. Cyber Security Policy**
- iv. Data Protection Policy**
- v. Disclosure of Matters of Public Interest (Whistleblowing)**
- vi. Freedom of Information Policy**
- vii. Risk Policy**
- viii. Student Privacy Notice**

Members received, considered and **approved** the above policies, and **recommend them to the Trust Board**, subject to policy ii being named as 'Appropriate Policy (GDPR)' and the proposed change below.

Members reflected that several of the policies reference to required training and queried whether the timeframe for 'completion of associated mandatory training' should be explicitly added to the policy. S Hope to add this to policy iii and iv.

S Hope

11. Any Other Business

None.

The meeting closed at 6.08pm