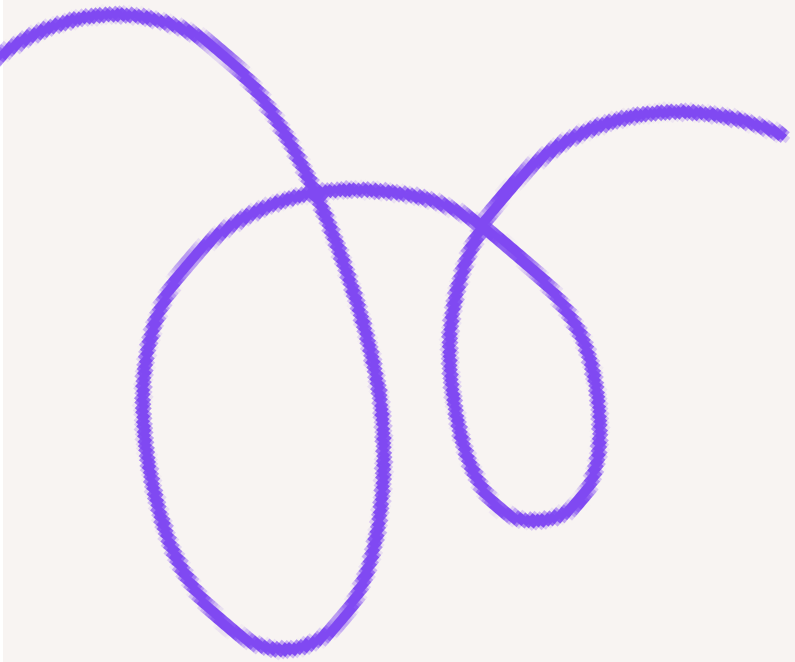




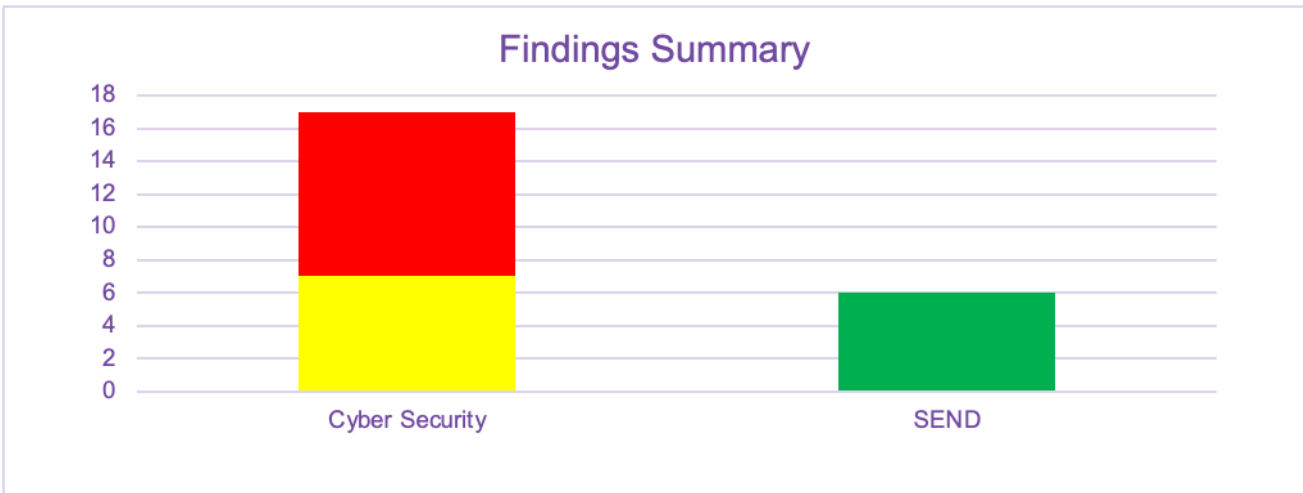
Internal Scrutiny Annual Report 2024 - 2025



Client: Ashley Hill Multi-Academy Trust

Juniper
Education

Executive Summary

Reviews undertaken: Non-Financial Internal Scrutiny (Cyber Security): July 2025 Non-Financial Internal Scrutiny (SEND): March 2025	Review provided by: Secure Schools Juniper Education																
Findings Summary <table><thead><tr><th>Category</th><th>High Priority</th><th>Medium Priority</th><th>Low Priority</th><th>Total</th></tr></thead><tbody><tr><td>Cyber Security</td><td>10</td><td>7</td><td>0</td><td>17</td></tr><tr><td>SEND</td><td>0</td><td>0</td><td>6</td><td>6</td></tr></tbody></table>	Category	High Priority	Medium Priority	Low Priority	Total	Cyber Security	10	7	0	17	SEND	0	0	6	6	Total number of recommendations: 23	
	Category	High Priority	Medium Priority	Low Priority	Total												
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This report provides assurance that adequate controls are being operated within the trust, based on the understanding that the information provided during the review is accurate and complete. It should be noted however that recommendations to improve controls, if implemented, cannot guarantee that fraud or misappropriation could not occur.

Recommendations raised in the report issued should be considered by the board of trustees / Audit and Risk Committee to assist them in providing assurance over the suitability of, and compliance with, the systems and operational controls in place.

No fraud was identified or reported to us for the 2024-25 period. It remains the responsibility: of management to manage the control environment to help identify potential fraud and prevent the likelihood of fraud occurring.

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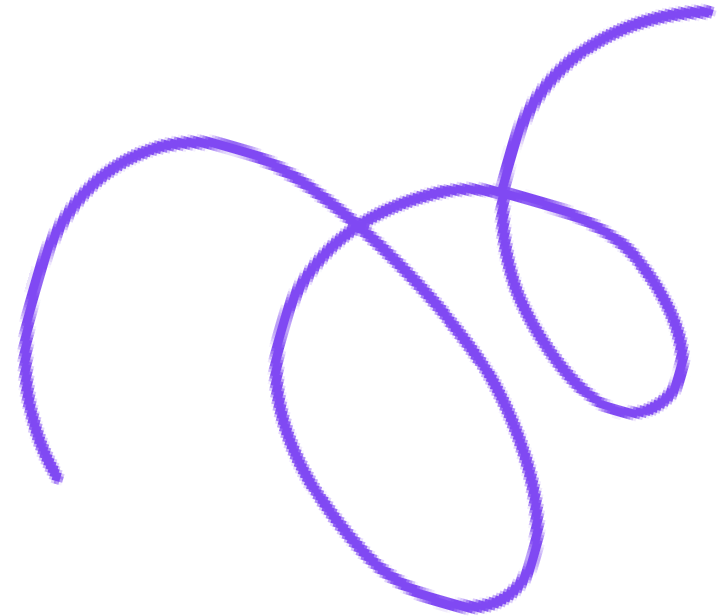
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Introduction

The Academy trust handbook specifies “The trust must identify on a risk-basis (with reference to its risk register) the areas it will review each year.”

Providing that the trust has selected a scope of work for financial and non-financial controls and has considered its risk register, this Internal Scrutiny Report demonstrates how the trust meets the Academy trust handbook 2024 internal scrutiny requirements.

Please note that this report is an exception report and therefore only contains the details of any issues arising from the review of the scope of work detailed below.



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Cyber Security Audit (Knowl Hill C of E Primary) Statement

Between 18 March 2025 and 21 May 2025, Secure Schools conducted a cybersecurity audit at Knowl Hill CofE Academy. This audit evaluated the academy's conformance with the current expectations from the Department for Education (DfE), combined with the IASME Cyber Assurance standard for information security governance, including the Cyber Essentials scheme. The self-evaluation phase of the review identified 16 actionable points to remedy non-conformances against the aforementioned standards. To provide some context, this places the academy as having a **strong cybersecurity posture** compared to schools and colleges audited by Secure Schools in the last twelve months. Although this report will refer to negative findings as non-conformances, it should be noted that unless explicitly stipulated, such findings are not statutory or regulatory requirements of the academy. Some action points may be partially remediated as the academy has already begun to take steps to address these risks, but additional efforts are needed to fully meet the required standards.

Scope

The relevant committee approved the below scope of work:

Cyber Security Audit (Knowl Hill C of E Primary)

A review to establish the level in which your school or trust is fulfilling its duties and responsibilities concerning cyber security.

Understanding your School or Trust

Leadership, Risk Management & Governance

Information Assets & Risk Management

Managing Cloud Services

Data Protection- Data Security (optional)

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Internal Scrutiny Report

People
Cyber Security Policy
Change Management
Security Testing, Audit & Assurance
Incident Management, Continuity & Recovery

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SEND Executive Summary (Bisham C of E Academy)

Bisham C of E Academy is a kind, caring and truly inclusive school, where leaders at all levels and staff go above and beyond to support their pupils. Trust and school leaders are pro-active in planning how to support all pupils, including the most vulnerable. All areas of school are strategically planned, and these plans are communicated well to all staff. The Headteacher is also the SENDCo, and this allows for inclusion to receive the spotlight it deserves. There is a clear graduated plan in place, where high quality teaching is at the heart of all plans. The curriculum has been devised by the Trust CEO and curriculum lead with the most vulnerable at the centre. This ensures the best interests of all pupils are met. There is a robust monitoring programme in place which leads to

regular and purposeful CPD. All of which, leads to better outcomes for pupils. The assess, plan, do, review process has structure and all stakeholders are involved. The school makes use of strategies such as observation, staff feedback, pupil voice and behaviour support plans to help provide more in-depth evidence for the identification of any unmet needs. They leave no stone unturned. This process helps pupils to access the right support. Parents are invited in to review their child's plan three times per year, but they have the opportunity to talk to their child's teacher and/or relevant senior leader, when needed. Pupil voice is also completed as part of the review process. Communication with parents/carers is a priority for the school and there has been a lot of work put in place to ensure it is purposeful and supportive. Interventions are targeted and given the time needed to show impact and they are regularly reviewed. The school

also works closely with external agencies to provide specialist support as well both for pupil intervention and staff CPD Bisham C of E Academy is not a school where pupils are regularly suspended or permanently excluded. They work with teachers, pupils and families to unpick any unmet needs or issues. They do not give up on their pupils - they want to help them succeed, enjoy coming to school and make progress. Leaders and staff understand and know their pupils and their needs well. Strong leadership and strategic plans have had a

positive impact on low-level incidents. Attendance procedures are thorough and support the promotion of good attendance for all pupils. Pupils have access to a variety of resources to support them and these range from kindness boxes to the sensory room. Leaders at Bisham C of E Academy are prepared to think outside the box to help their pupils succeed and thrive. Leaders want their pupils to have a range of experiences and as such have increased the range of activities on offer. In addition, due to all staff knowing their pupils well the school offers activities which will interest them. This has resulted in pupils with SEND taking part in activities they would not have previously considered. The national issue around SEND funding also applies to Bisham C of E Academy and can be a limiting factor when considering provision.

Both the CEO and Headteacher maximise the use of resources available to support all their pupils with SEND

SEND provision at Bisham C of E Academy is effective and pupils' needs are met.

SEND Review (Bisham C of E Academy)

The purpose of the audit was to review the SEND provision at Bisham C of E Academy. During the audit the following questions were considered:

- How does the school ensure the needs of all learners are met?
- How does the curriculum meet the needs of all learners, including those with SEND?
- How are pupils with SEND prepared for the next stage of education?
- How does the school ensure teachers are making accurate and consistent judgements about the progress and attainment of pupils with SEND?
- What does the school's data tell you about the attainment and progress of pupils with SEND?
- How are teachers supported to understand the specific needs of their pupils?
- What interventions are in place for pupils with SEND?
- What impact do the interventions have?
- How does the school ensure consistent management of behaviour?
- How are pupils with SEND prepared for life in modern Britain? What work takes place around character development and personal skills?

Internal Scrutiny Report

Individual recommendations priority key:

A system of grading internal scrutiny findings, which have resulted in an action, has been adopted in order that the significance of the findings can be ascertained. Each finding is classified as High, Medium or Low. The definitions of each classification are set out below:

Cyber Security:

High Priority	Essential measures that address immediate and high-level cyber security risks.
Medium Priority	Actions that focus on strengthening cyber security over a longer term.

SEND:

High Priority	Recommendations need urgent attention.
Medium Priority	Recommendations need attention.
Low Priority	Recommendations to offer best practice.

RAG	Finding	Recommendation
Non-Financial Internal Scrutiny – Cyber Security (Knowl Hill C of E Primary)		
High Priority	Document in formal written policies how the school approaches cybersecurity. We recommend this is achieved by implementing the following policies: - Information security policy - Password policy - Firewalling policy - Access control policy - Secure configuration policy - Anti-malware policy - Patch management policy - Asset management policy - Acceptable usage policy - Removable media policy - Domain security policy - Supply chain security policy - IT asset disposal policy - Remote working policy - BYOD policy - Physical security policy Ensure these policies have been ratified by the board and signed by the board member responsible for cybersecurity. Additionally, secure agreement from the IT service provider to uphold and support these policies.	
Management Response:		Responsibility & Due Date:
One single overarching policy has been created for all staff facing policies. Individual policies that relate to IT management/ processes have also been created.		Completed October 2025

Internal Scrutiny Report

RAG	Finding	Recommendation
Medium Priority	Schedule annual surveillance audits that support this action plan.	
<i>Management Response:</i>		<i>Responsibility & Due Date:</i>
	Annual vulnerability scanning and penetration scanning will be conducted on a three year programme prior to Internal Scrutiny.	NMX will commission. September 2026 & 2028
High Priority	Create an asset register for information assets (physical, people and data) that details their security requirements, relative value, owner, location, encryption status, password status and informs risk assessments.	
<i>Management Response:</i>		<i>Responsibility & Due Date:</i>
	Asset register already existed, NMX will update and include additional information required.	NMX December 2025
Medium Priority	Create flow maps which detail how your data enters and leaves the organisation. These flow maps should encompass the data's origin, storage location, and destination.	
<i>Management Response:</i>		<i>Responsibility & Due Date:</i>
	The Directors don't feel this compromises cyber security and will therefore not action this point.	November 2025
Medium Priority	Create a register (or update the school's information asset register) that identifies or records the school's cloud service providers. This register should also record the service provider's security accreditations, the location of the data and whether data is encrypted in transit and at rest.	
<i>Management Response:</i>		<i>Responsibility & Due Date:</i>

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RAG	Finding	Recommendation
	This register has been created by NMX.	NMX December 2025
Medium Priority	Update staff employment contracts to include cybersecurity responsibilities and compliance with information security policies.	
<i>Management Response:</i>		<i>Responsibility & Due Date:</i>
	Staff employment contracts updated By NMX to include cybersecurity responsibilities and compliance.	NMX December 2025
High Priority	Maintain documentation of all externally enabled services, along with their business justifications. Review these services each term and disable or delete any that are no longer necessary.	
<i>Management Response:</i>		<i>Responsibility & Due Date:</i>
	New register created by NMX.	NMX December 2025
High Priority	Enforce device locking mechanisms that necessitate biometrics, a 6-character pin, or a robust and unique password for device access.	
<i>Management Response:</i>		<i>Responsibility & Due Date:</i>
	Pupil l pads required a 6 digit passcode. This has been implemented across the Trust.	School staff November 2025
High Priority	Ensure the correct configuration of MX, SPF, DKIM, and DMARC records for all email domains to mitigate against email spoofing.	
<i>Management Response:</i>		<i>Responsibility & Due Date:</i>
	This has historically been applied by the Trust for all active emails domain. This is only required for website domains.	NMX December 2025

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RAG	Finding	Recommendation
High Priority	Implement drive encryption across all organisation-owned devices, where supported.	
<i>Management Response:</i>		<i>Responsibility & Due Date:</i>
NMX has completed encryption across missing devices.		NMX December 2025
High Priority	Establish a formal process with the SLT on securing access to key system passwords and PINs in the event of an emergency, or if IT support are unavailable.	
<i>Management Response:</i>		<i>Responsibility & Due Date:</i>
NMX has created a secure formal process for SLT.		NMX December 2025
High Priority	Create a break-glass administrative account specifically reserved for the SLT for emergency use when regular IT support is unavailable.	
<i>Management Response:</i>		<i>Responsibility & Due Date:</i>
Password manager has been deployed to SLT with all break glass accounts for emergency accounts accessible.		NMX December 2025
High Priority	Enable and enforce multi-factor authentication for all accounts that support MFA.	
<i>Management Response:</i>		<i>Responsibility & Due Date:</i>
From a staff perspective this has already been enabled. This isn't appropriate for pupil access.		September 2020
Medium Priority	Establish a central location for maintaining an audit trail of system and data access by staff across all relevant systems. Implement a regular review process.	
<i>Management Response:</i>		<i>Responsibility & Due Date:</i>

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RAG	Finding	Recommendation
	Microsoft 365 auditing is enabled but a centralised platform is required to capture information from all other platform. An implementation to be discussed and aligned with future budgets.	November 2025
Medium Priority	Periodically scan IT systems for known vulnerabilities so that security risks can be treated before being exploited. Report to the board at least annually.	
<i>Management Response:</i>		<i>Responsibility & Due Date:</i>
	Vulnerability scanning will be conducted on an annual basis.	NMX will commission. September 2026
Medium Priority	Periodically perform penetration tests to measure the effectiveness of already implemented administrative and technical/logical controls. Report to the board at least annually.	
<i>Management Response:</i>		<i>Responsibility & Due Date:</i>
	Penetration scanning will be conducted on a three year programme prior to Internal Scrutiny.	NMX will commission. September 2028

RAG	Finding	Recommendation
Non-Financial Internal Scrutiny – SEND (Bisham C of E Academy)		
Low Priority	Look at the starting point of the pupils in the room so they are all challenged from the outset. Do they need to start on the first task, or could they move straight to the more challenging one?	
<i>Management Response:</i>		<i>Responsibility & Due Date:</i>

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RAG	Finding	Recommendation
	Bisham teaching staff and SENDCO take each child's ability into account when setting work. Tracking documents are in place especially for those working below National Standard which are tracked throughout the year and are passed onto next year teaching at end of year handover meetings.	Teachers; SENDCO – was already in place
Low Priority	Report the starting point and finishing point when discussing progress as well as final data due to size of the school.	
<i>Management Response:</i>		<i>Responsibility & Due Date:</i>
	Bisham teaching staff and SENDCO, Curriculum lead and CEO meet termly to discuss termly progress of each child. Insight, the Trust Data Tracking system allows all pupils as individuals, and specific group progress to be tracked from their starting points. In addition class teachers also complete a Pupil Progress Meeting form that highlights groups and individuals progress from starting points and discuss what support and intervention is in place to support pupils learning. In additions, documents are in place for those working below National Standard which are tracked throughout the year and are passed onto next year teaching at end of year handover meetings and discussed and reviewed at termly Pupil Progress Meeting.	Teachers; SENDCO – was already in place
Low Priority	Implement an extra-curricular tracker to identify which cohorts of pupils are attending clubs and activities.	
<i>Management Response:</i>		<i>Responsibility & Due Date:</i>
	Leadership and Office Manager is aware of which children attend school run clubs. All other clubs are run and monitored by external bodies.	HoS & Office Manager– was already in place
Low Priority	Implement a whole-school provision map including universal, targeted and specialist across the 4 areas of need.	
<i>Management Response:</i>		<i>Responsibility & Due Date:</i>

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RAG	Finding	Recommendation
	Local Offer document on websites captures this information and is updated yearly.	SENDSCO – was already in place
Low Priority	Investigate the use of different screeners and assessments e.g. sensory checklist, strengths and difficulties questionnaires.	
<i>Management Response:</i>		<i>Responsibility & Due Date:</i>
	Appropriate and relevant screeners are used throughout the trust.	SENDSCO – was already in place
Low Priority	Track behaviour data in cohorts as well as a total and the type of incident – this can be done as an end of year overview.	
<i>Management Response:</i>		<i>Responsibility & Due Date:</i>
	All behaviour is tracked and monitored on our MIS and cohorts behaviour is well known and understood by all staff.	Staff & SENDSCO – was already in place

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