



TSO Education resource

Internal scrutiny readiness checklist

A practical academy trust checklist for audit and risk committees, accounting officers, CFOs and governance leaders who need a stronger internal scrutiny cycle before the next review window.

Document metadata

- Checked on 23 March 2026
- PDF checklist
- For academy trust audit and risk committees, CFOs and governance leaders.
- Includes evidence, owner and next-action prompts for each section.

How to use this checklist

- Use this checklist before agreeing the annual internal scrutiny plan or before the next audit and risk committee review of coverage and independence.
- Treat it as a readiness and evidence tool, not only as a compliance tick sheet. The objective is governance confidence, faster challenge, and fewer year-end surprises.
- Where a check is not yet met, record the owner, interim control, target date and committee route for follow-up rather than marking the item complete too early.

Usage notes

How to use this document

Use this section to frame the discussion before the committee works through the detailed checklist tables. The prompts are intended to guide planning, challenge and follow-up.

Recommended sequence

1. Use this checklist before agreeing the annual internal scrutiny plan or before the next audit and risk committee review of coverage and independence.
2. Treat it as a readiness and evidence tool, not only as a compliance tick sheet. The objective is governance confidence, faster challenge, and fewer year-end surprises.
3. Where a check is not yet met, record the owner, interim control, target date and committee route for follow-up rather than marking the item complete too early.

Open with these readiness questions

- Annual objectives are governance-approved
- Scope is demonstrably risk-led
- Independence is clear and defensible
- Reporting cadence supports challenge
- Follow-up proves closure quality
- Year-end assurance can be assembled without panic

Baseline criteria

Readiness criteria

Use these six criteria first. If trustees cannot evidence them clearly, the trust is unlikely to be fully ready for a strong internal scrutiny cycle.

CHECK	WHY IT MATTERS	EVIDENCE TO CONFIRM	OWNER AND NEXT ACTION
Annual objectives are governance-approved	Trustees can point to explicit scrutiny objectives for the year, not just a list of review topics.	Board or audit and risk committee approval minute referencing the internal scrutiny plan and intended assurance outcomes.	Owner: Audit and risk committee chair with the accounting officer and CFO. Next action: Document the objective for each planned review and confirm how success will be judged at report stage.
Scope is demonstrably risk-led	Review topics are traceable to the live trust risk register, key control weaknesses or material change pressures.	Cross-reference between risk register entries, control objectives and planned scrutiny activity.	Owner: Risk owner, CFO and internal scrutiny lead. Next action: Add a simple risk coverage matrix and refresh it termly if risks shift.
Independence is clear and defensible	Trustees can explain why the chosen scrutiny model is appropriately independent for the work being undertaken.	Documented delivery model, conflicts check and rationale for reviewer selection.	Owner: Audit and risk committee with the governance professional. Next action: Record safeguards where in-house knowledge or peer review is used alongside bought-in assurance.
Reporting cadence supports challenge	Committee papers arrive with enough structure and frequency for trustees to challenge recurring issues and overdue actions.	Termly committee calendar, report template and escalation protocol for critical or overdue findings.	Owner: Governance professional and audit and risk committee chair. Next action: Agree issue dates, summary dashboard format and the route for urgent escalation outside routine meetings.
Follow-up proves closure quality	High-risk actions are not closed on narrative updates alone; they are evidenced and, where needed, re-tested.	Action tracker with closure evidence, re-test notes and decision trail for any accepted residual risk.	Owner: Action owners, executive lead and internal scrutiny provider. Next action: Add mandatory evidence fields and re-test requirements for high-risk findings.

CHECK	WHY IT MATTERS	EVIDENCE TO CONFIRM	OWNER AND NEXT ACTION
Year-end assurance can be assembled without panic	The trust can compile its annual summary report and supporting pack without reconstructing evidence late in the cycle.	Live assurance file covering approved plan, reports, actions, minutes and draft year-end narrative.	Owner: CFO, governance professional and audit and risk committee. Next action: Maintain the assurance pack during the year rather than building it retrospectively in summer.

Checklist section

Planning and mobilisation

This section is the strongest predictor of delivery quality. It should be complete before fieldwork begins and refreshed if trust risk or operating conditions change materially.

CHECK	WHY IT MATTERS	EVIDENCE TO CONFIRM	OWNER AND NEXT ACTION
Annual internal scrutiny plan is formally approved	The trust has a current plan approved by trustees or the delegated audit and risk committee.	Approved plan, decision minute and version date.	Owner: Audit and risk committee chair and governance professional. Next action: Log approval date and confirm whether any mid-year re-approval trigger has been agreed.
Plan references top trust risks and control objectives	Each review scope is linked to the risk or control question it is intended to test.	Risk register reference and control objective shown against each planned review.	Owner: CFO and risk lead. Next action: Remove review topics that cannot be linked to a current risk, statutory priority or known weakness.
Coverage spans financial and non-financial control areas	The programme is not limited to finance alone and reflects current board exposure across governance, compliance and operations.	Scope map showing financial, governance, compliance and operational themes.	Owner: Audit and risk committee and accounting officer. Next action: Stress-test whether safeguarding, cyber, procurement, workforce or estate risks need inclusion or specialist review.
Delivery model and independence safeguards are documented	Trustees can explain why the chosen provider or model remains independent enough for the work being commissioned.	Delivery option note, conflicts review and reviewer assignment.	Owner: Governance professional and audit and risk committee. Next action: Document any limitation where the reviewer has prior operational involvement or where specialist support is being blended in.
Report format and ratings are standardised	Reports use a consistent structure so committees can compare findings across reviews and across terms.	Standard report template and rating definitions.	Owner: Internal scrutiny lead and committee chair. Next action: Make sure every report distinguishes control design weakness, operating failure, impact and required action.
Action tracker is agreed before the first report issues	Closure, overdue items and evidence quality are defined in advance instead of improvised later.	Action log template with owner, target date, risk status and closure evidence fields.	Owner: Governance professional and executive lead. Next action: Require supporting evidence for high-risk closure and reserve status-only updates for low-risk items only.
Reporting calendar is aligned to committee dates	Review timing gives trustees enough time to consider findings before major governance or year-end decisions.	Calendar showing fieldwork, report issue, committee dates and follow-up checkpoints.	Owner: Governance professional. Next action: Bring forward fieldwork where committee dates would otherwise force reporting after decisions have already been made.

CHECK	WHY IT MATTERS	EVIDENCE TO CONFIRM	OWNER AND NEXT ACTION
Criteria for in-year reprioritisation are agreed	The trust knows when to adjust scope if risks change, incidents occur or delivery assumptions fail.	Recorded trigger points for plan change, such as major control failure, incident, leadership turnover or risk escalation.	Owner: Audit and risk committee and accounting officer. Next action: Add a brief paper template for scope change decisions so the rationale is preserved.
Year-end summary timetable is reserved early	The trust has space in the governance calendar for annual synthesis and next-year planning.	Committee date and owner for the annual summary internal scrutiny report.	Owner: Audit and risk committee chair and CFO. Next action: Reserve time for reviewing unresolved actions, year-on-year progress and next-year priorities before summer deadlines tighten.

Checklist section

Risk coverage matrix

A simple matrix is one of the quickest ways to prove that the programme is risk-led. It also helps trustees challenge under-covered risks before the year is too far advanced.

CHECK	WHY IT MATTERS	EVIDENCE TO CONFIRM	OWNER AND NEXT ACTION
Risk register reference is captured	Every planned review points to a current risk entry or equivalent control priority.	Risk ID and current RAG status.	Owner: Risk lead and committee chair. Next action: Flag any review topic that cannot be tied back to a live board-level or academy-level risk.
Control objective is stated explicitly	The trust is clear on the control that should be operating, not just the process area under review.	One-sentence control objective for each review line.	Owner: Executive owner and reviewer. Next action: Rewrite vague scope lines so they describe the assurance question trustees need answered.
Planned review activity is defined	The matrix shows what will actually happen, such as testing, walkthroughs, data review or targeted sampling.	Planned testing method and expected output.	Owner: Internal scrutiny lead. Next action: Add enough detail to distinguish light-touch oversight from a substantive review.
Reporting period is visible	Trustees can see when the work is due and whether timing still aligns to the risk profile.	Term or month of planned reporting.	Owner: Governance professional. Next action: Move reviews that are scheduled too late to influence decisions on finance, compliance or safeguarding risk.
Follow-up expectation is recorded	The matrix makes clear whether a review will need re-test work, ongoing monitoring or year-end revisit.	Follow-up requirement, responsible owner and likely committee route.	Owner: Audit and risk committee and reviewer. Next action: Mark which reviews require formal re-test before the annual summary report is drafted.

Checklist section

Testing standards

Internal scrutiny becomes less useful when one review is evidence-heavy and another is mostly narrative. These standards help build consistency across both financial and non-financial work.

CHECK	WHY IT MATTERS	EVIDENCE TO CONFIRM	OWNER AND NEXT ACTION
Control objective is defined before testing starts	Reviewers agree the expected control and the failure condition before sampling begins.	Testing worksheet or planning note with the control objective and expected control owner.	Owner: Reviewer and executive lead. Next action: Do not start fieldwork until the reviewer can describe what a pass, partial pass and fail would look like.

CHECK	WHY IT MATTERS	EVIDENCE TO CONFIRM	OWNER AND NEXT ACTION
Sample sizes are proportionate to risk	Sampling is driven by risk, transaction volume and control sensitivity rather than habit or convenience.	Sampling rationale or coverage note.	Owner: Reviewer. Next action: Increase sampling where high-risk exposure, weak controls or dispersed academy variation are evident.
Evidence source, date and owner are recorded for each test	The trust can return to the supporting evidence without repeating fieldwork.	Evidence log showing source file, date seen and accountable owner.	Owner: Reviewer and action owner. Next action: Introduce a minimal evidence index if reports currently rely on generic references or verbal updates.
Design weakness and operating failure are separated	Committees can see whether a control is poorly designed, poorly implemented or both.	Finding wording that distinguishes control design from operational compliance failure.	Owner: Reviewer and committee chair. Next action: Split blended findings into separate causes if the report currently hides root-cause detail.
Impact and root cause are stated for significant findings	The report goes beyond symptom description and supports better prioritisation and follow-up.	Finding summary with impact, root cause and required action.	Owner: Reviewer and executive lead. Next action: Reject reports that present issue lists without explaining consequence or why the weakness occurred.

Checklist section

Reporting cadence and committee challenge

Good scrutiny requires interaction, not report circulation alone. Cadence should support escalation, pattern recognition and better decision-making rather than late-stage surprise.

CHECK	WHY IT MATTERS	EVIDENCE TO CONFIRM	OWNER AND NEXT ACTION
Reports issue within an agreed timeframe after fieldwork	Findings stay current enough to influence decisions and remedial action.	Service standard or internal timetable for draft and final issue dates.	Owner: Reviewer and governance professional. Next action: Set a maximum issue window and report exceptions to the committee if it is missed.
Committee receives a termly summary of delivered work and major findings	Trustees can compare themes across reviews rather than discussing each report in isolation.	Termly dashboard or committee summary paper.	Owner: Audit and risk committee chair and CFO. Next action: Include repeat findings, overdue actions and emerging risks in the summary, not only completed reviews.
High-risk actions are monitored between committee meetings	Critical findings do not disappear for a whole term because no routine update point exists.	Monthly or scheduled action update for high-risk items.	Owner: Executive lead and governance professional. Next action: Add interim escalation for overdue critical actions rather than waiting for the next full committee meeting.
Escalation route for overdue or disputed actions is explicit	Management disagreement or slippage cannot be quietly absorbed into the next cycle.	Escalation protocol and decision-maker for unresolved risk.	Owner: Accounting officer and audit and risk committee chair. Next action: Define who decides whether residual risk can be accepted and where that decision is recorded.

CHECK	WHY IT MATTERS	EVIDENCE TO CONFIRM	OWNER AND NEXT ACTION
Trustees challenge repeat findings directly	The committee asks whether recurring weaknesses show that previous action closed the symptom but not the root cause.	Minutes showing challenge on repeated control failures.	Owner: Audit and risk committee members. Next action: Track repeated themes in the dashboard so committees do not have to infer patterns manually.
Trustees can identify where overdue actions are clustering	Concentration by function, academy or risk area is visible and discussed.	Action tracker grouped by school, function or risk theme.	Owner: Governance professional and CFO. Next action: Highlight concentration risk where one school or function carries disproportionate overdue exposure.
Management response is tested for quality, not just tone	The committee can see whether the response addresses the underlying process weakness or only the immediate finding.	Response wording and committee discussion notes.	Owner: Executive owner and committee chair. Next action: Reject actions that only restate policy, schedule training or promise reminders without fixing the process weakness.
Unresolved risk can trigger scope reprioritisation	The plan remains live if the control environment changes materially during the year.	Committee decision or scope change note triggered by unresolved risk.	Owner: Audit and risk committee and reviewer. Next action: Bring forward re-test or a deeper follow-up review where high-risk exposure remains open too long.

Checklist section

Year-end assurance pack

The strongest trusts treat the year-end pack as a running assurance file. That reduces summer pressure and improves the quality of the committee narrative and annual summary conclusions.

CHECK	WHY IT MATTERS	EVIDENCE TO CONFIRM	OWNER AND NEXT ACTION
Approved plan and in-year changes are retained together	The trust can evidence what was planned originally and how the programme changed during the year.	Approved plan plus documented plan changes with rationale.	Owner: Governance professional. Next action: Keep version control simple and record why each change was made.
Final reports for completed work are assembled	All completed reviews are available in one place for summary and external scrutiny.	Indexed folder or assurance pack section containing signed-off reports.	Owner: Internal scrutiny lead. Next action: Capture final issue dates and ensure superseded drafts are clearly marked or removed.
Consolidated findings table is maintained by risk theme	The trust can explain year-end patterns rather than narrating each report independently.	Findings summary grouped by theme, significance and status.	Owner: CFO and governance professional. Next action: Group by recurring risk themes such as procurement, safeguarding, data, governance or financial reporting.
Action tracker includes verified closure evidence	Closure is backed by evidence and, where required, by re-test results.	Tracker entries with closure evidence references and validation notes.	Owner: Action owners and reviewer. Next action: Mark accepted residual risk separately from fully closed actions so year-end conclusions remain honest.

CHECK	WHY IT MATTERS	EVIDENCE TO CONFIRM	OWNER AND NEXT ACTION
Follow-up reports and re-test outcomes are filed	Trustees can show whether key recommendations actually improved the control environment.	Follow-up notes, re-test summary and committee receipt.	Owner: Reviewer and governance professional. Next action: Schedule follow-up evidence capture before year-end deadlines compress.
Committee minutes show oversight and challenge	Governance challenge is evidenced, not assumed.	Minutes showing discussion of major findings, overdue actions and open risk decisions.	Owner: Governance professional and committee chair. Next action: Check that minutes record the questions asked and the decisions made, not only that papers were noted.
Draft annual assurance judgement and next-year priorities are prepared	The annual summary report supports both current-year accountability and next-year planning.	Draft annual summary report and proposed priorities for the following cycle.	Owner: Audit and risk committee chair, CFO and accounting officer. Next action: Use unresolved high-risk findings and repeated themes to shape the next-year programme rather than starting from a blank sheet.

Checklist section

Common DfE issues and watchpoints

The DfE assurance findings provide a practical sense check on where academy trust control frameworks are still failing in the field. This checklist section is designed to bring those watchpoints into the scrutiny readiness conversation.

CHECK	WHY IT MATTERS	EVIDENCE TO CONFIRM	OWNER AND NEXT ACTION
No internal scrutiny has taken place or it is too limited	A nominal programme with no substantive reviews still leaves the board without the assurance expected by the handbook.	Completed reviews against the approved plan and annual summary report readiness.	Owner: Audit and risk committee and accounting officer. Next action: Escalate immediately if delivery is materially behind plan and agree catch-up or reprioritisation.
Annual summary report quality is inconsistent	A weak annual summary undermines trustees' ability to assess year-on-year progress.	Draft annual summary against a standard template with findings, recommendations and conclusions.	Owner: Reviewer and committee chair. Next action: Set quality expectations for the annual summary early and compare drafts before year-end submission pressure builds.
Financial management and reporting remain a live risk	DfE assurance work continues to highlight issues with management accounts, reporting completeness and control framework strength.	Termly management accounts pack including cash flow, balance sheet and board review evidence.	Owner: CFO and board chair. Next action: Confirm whether internal scrutiny should revisit management accounts, fixed assets or board reporting if concerns remain open.
Related party controls and interests require active attention	Prior approvals, declarations and conflict handling remain a recurring source of regulatory concern.	Register of interests, related party approvals log and evidence of board review.	Owner: Governance professional and accounting officer. Next action: Add targeted scrutiny or compliance testing if recent changes, procurement pressure or weak declarations are evident.
Risk register oversight can drift into routine compliance	Boards often keep a register but do not use it well enough to drive scrutiny or challenge control strength.	Recent risk register review showing movement, mitigation updates and committee discussion.	Owner: Risk lead and audit and risk committee. Next action: Refresh risk definitions and top-risk prioritisation before finalising the scrutiny plan.

CHECK	WHY IT MATTERS	EVIDENCE TO CONFIRM	OWNER AND NEXT ACTION
Non-financial controls need the same assurance discipline	Cyber, safeguarding, estates, procurement and publication controls should not be left outside formal assurance simply because they are operational.	Non-financial coverage decisions and rationale within the plan.	Owner: Accounting officer and audit and risk committee chair. Next action: Use specialist reviewers where needed, but keep ownership and follow-up inside the same governance discipline as financial work.

Source notes

Official guidance baseline

This checklist version is anchored to current official guidance checked on 23 March 2026. Review these sources again before reissuing the document.

Core framework

Academy trust handbook 2025

Effective from 1 September 2025 | Updated 22 October 2025

Primary contractual framework for academy trust governance, internal scrutiny and annual accounts responsibilities.

Open source [↗](#)

Scrutiny requirements

Internal scrutiny in academy trusts

Published 14 February 2024 | Listed within good practice guides updated 23 September 2025

Current DfE good practice guidance for building and directing the internal scrutiny programme.

Open source [↗](#)

Governance guidance

Academy trusts: governance guide

Published 19 November 2025

Current governance guide covering accountability, assurance and board responsibilities.

Open source [↗](#)

Annual accounts

Academies accounts direction and submitting your audited financial statements

Published 12 June 2015 | Updated 13 October 2025

Current annual accounts submission guidance, including the 2024 to 2025 accounts direction and deadlines.

Open source [↗](#)

Common issues

Common issues identified from DfE's assurance work: 2024 to 2025

Updated 17 September 2025

Useful reality check on recurring academy trust weaknesses in financial reporting, internal scrutiny and governance.

Open source [↗](#)

Direct-adjacent official guidance

Meeting digital and technology standards in schools and colleges

Published 23 March 2022 | Updated 12 February 2026

Relevant where scrutiny readiness includes cyber, digital leadership and governance controls.

Open source [↗](#)

Direct-adjacent official guidance

Academy trust risk management

Published 18 May 2021

Useful companion guidance on risk ownership, risk registers and linking internal scrutiny to the trust risk framework.

Open source [↗](#)