



# **ETHOS ACADEMY TRUST SCHEME OF DELEGATION**

**2022/23**

## **1. Introduction**

- 1.1 Ethos Academy Trust's Board of Trustees is accountable in law for all major decisions about the Trust and its constituent academies. However, this does not mean that the Board is required to carry out all the Trust's governance functions and many can and should be delegated, including to the CEO, the Board's Committees, and, where agreed by Trustees, to Academy Performance Review Committees. Any decision to delegate a function is made by the full Board of Trustees and is recorded. Without such delegation, an individual or Committee has no power to act.
- 1.2 This Scheme of Delegation is the key document defining the lines of responsibility and accountability in the Trust. It is intended to ensure that Members, Trustees, Board Committees, Academy Performance Review Committees (as agreed by Trustees), the Chief Executive Officer (and Trust Central Team) and academy Head Teachers are all clear about their roles and responsibilities. This overarching Scheme of Delegation for all decision making in the Trust should not be confused with the written scheme of delegation of financial powers referred to in the Academy Trust Handbook.
- 1.3 This Scheme of Delegation incorporates the Trust's Financial Scheme of Delegation. It is intended to capture the strategic (and key operational) delegated responsibilities of Members, Trustees, Executive leadership, Head Teachers and Academy Performance Review Committees.
- 1.4 The Board of Trustees will, on an annual basis, review and determine which level of delegation applies to each academy within the Trust. However, the Trustees may, at any time, instruct a change to the level of delegation as they feel appropriate.
- 1.5 Whilst the Trustees delegate down some functions, accountability cannot be delegated and therefore there must be appropriate reporting to the Trustees from the committees and the CEO and wider Executive Team.

## **2. Format, Structure and Clarity**

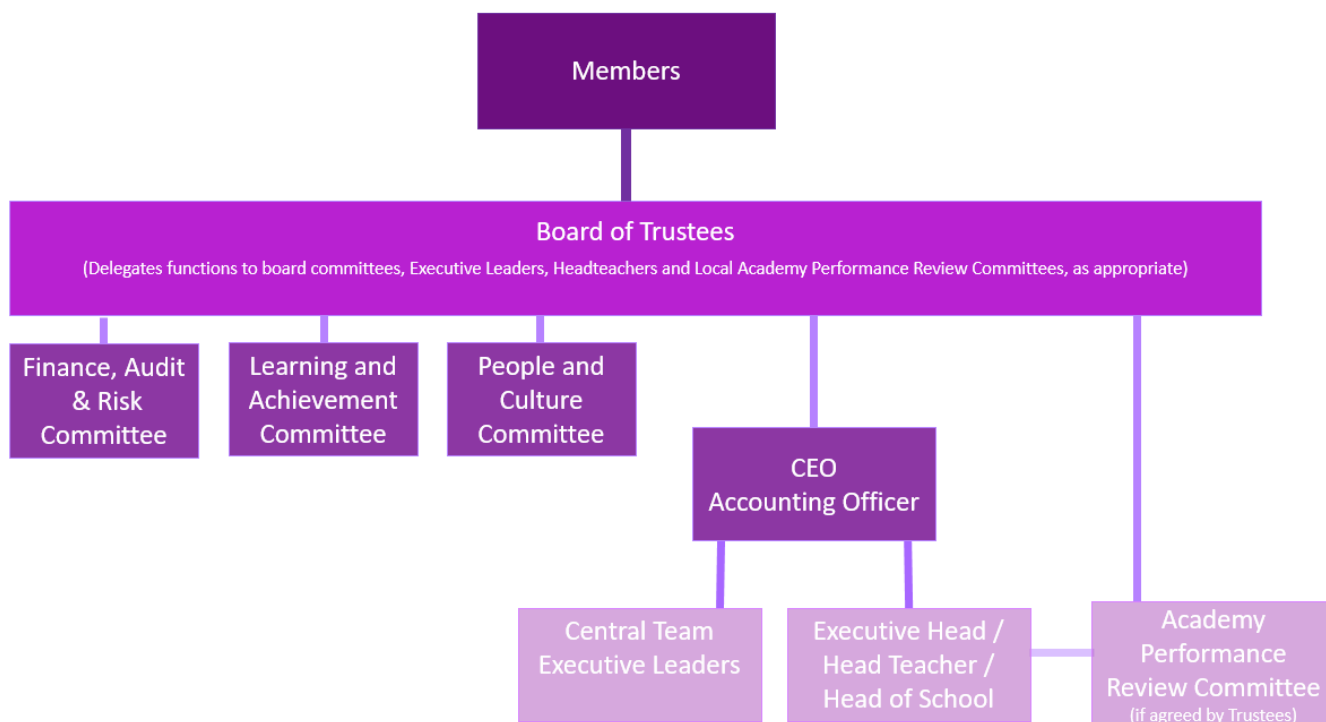
- 2.1 This Scheme of Delegation aims to clarify decision making and lines of accountability in a simple, succinct, and clear format and, as such, includes:
- A structure diagram which shows the layers of governance and lines of accountability;
  - A brief text description of the structure;
  - Narrative on roles and responsibilities;
  - A grid format, with columns for each layer of governance and leadership which enables stakeholders to quickly determine who is responsible for each strategic decision within the Trust.

### 3. Aims

3.1 This Scheme of Delegation is intended to:

- Promote a culture of honesty and accountability;
- Ensure all stakeholders are clear about which decisions the Trust Board retains and delegates;
- Identify responsibility for the appointment and performance management of the CEO, and academy Headteachers;
- Ensure that the role of the executive leadership is fully understood throughout the Trust;
- Identify responsibility for policy and practice in each academy and the Trust;
- Identify responsibility for oversight of educational performance in each academy;
- Identify responsibility for oversight of each academy's budget and across the Trust;
- Identify responsibility for assessment of risk in each academy and across the Trust.

### 4. Model of Delegation and Lines of Accountability



4.1 The Board of Trustees is responsible for the three core governance functions.

4.2 The Board appoint the CEO, to whom it delegates responsibility for delivery of its vision and strategy, and will hold the CEO to account for the conduct and performance of the Trust,

including the performance of the Academies within the Trust and for its financial management (as Accounting Officer).

4.3 The Board of Trustees conducts the Performance Management of the CEO.

4.4 In turn, the CEO has management responsibility for other senior executives and the academies' Headteachers, setting their targets and performance managing them.

4.5 The Board constitutes Committees for Finance, Audit and Risk; People and Culture and Learning and Achievement; these look in detail at resources and performance, progress and attainment across the Trust. As Board Committees, they must contain a majority of Trustees. Finance, Audit and Risk and Learning and Achievement Committees may co-opt up to 2 additional committee members. Co-opted Committee members can be appointed to the committee to fill a specific skill need. Co-opted Committee members are not authorised to act as Chair of the committee at any time.

4.6 The Board of Trustees reserves the right to delegate some of its school level monitoring and scrutinising functions to Academy Performance Review Committees, and uses these Committees to promote stakeholder engagement and as a point of consultation and representation. Trustees may not need to sit on some APRCs, and so lines of communication to the Board of Trustees must be clearly established. The CEO may seek input from the Chair of the APRC when undertaking the performance management of the Head Teacher.

4.7 Academy Performance Review Committees will NOT carry out the governance function of holding the Head Teacher / Principal to account; Trustees will delegate this responsibility to the CEO and will monitor and ensure that the Trust's performance management systems are working well.

## **5. Roles and Responsibilities**

### ***5.1 The Role of Members***

5.1.1 The Members of the Trust are guardians of the governance of the Trust and as such have a different status to Trustees. Originally, they were the signatories to the memorandum of association and agreed the Trust's first articles of association (the legal document which outlines the governance structure and how the Trust will operate). The articles of association also describe how Members are recruited and replaced, and how many of the Trustees the Members can appoint to the Trust Board. The Members appoint Trustees to ensure that the Trust's charitable object is carried out and so must be able to remove Trustees if they fail to fulfil this responsibility. Accordingly, the Board of Trustees and CEO submits an annual report on the performance of the Trust to the Members. Members are also responsible for approving any amendments made to the Trust's articles of association, appointing the Trust's External Auditors and making special resolutions to the Board of Trustees.

5.1.2 Ethos has five Members, and while Members are permitted to be appointed as Trustees, in order to retain a degree of separation of powers between the Members and the Trust Board, and in line with DfE expectations, the majority of Members should not be Trustees. Members are not permitted to be employees of the academy Trust.

## **5.2 The Role of Trustees**

5.2.1 The Trust is a charitable company and so Trustees are both charity Trustees (within the terms of section 177(1) of the Charities Act 2011) and company directors. Because Trustees are bound by both charity and company law, the terms 'Trustees' and 'directors' are often used interchangeably. Ethos Academy Trust uses the term Trustee.

5.2.2 The Trustees are responsible for the general control and management of the administration of the Trust, and in accordance with the provisions set out in the memorandum and articles of association and its funding agreement, the Trust Board is legally responsible and accountable for all statutory functions, for the performance of all schools within the Trust, and must approve a written scheme of delegation of financial powers that maintains robust internal control arrangements. In addition, it must carry out the three core governance functions:

- Ensure clarity of vision, ethos and strategic direction;
- Hold the executive to account for the educational performance of the Trust's schools and their pupils, and the performance management of staff;
- Oversee the financial performance of the Trust and make sure its money is well spent.

5.2.3 The Board of Trustees has the right to review and adapt its governance structure at any time which includes removing delegation.

5.2.4 Where the Board of Trustees deems the need for an Academy Performance Review Committee, the Trustees appoint all committee members, and may also remove any APRC member should there be concerns regarding their conduct or effectiveness.

## **5.3 The Role of the Board Committees**

5.3.1 The Board may establish Committees to carry out some of its governance functions which may include making decisions, although any decisions made will be deemed decisions of the Board of Trustees. The membership and responsibilities of Board Committees are set out in each Committee's terms of reference. It is usual for the Trust Board to appoint Board Committee Chairs and Committee members according to their skills.

## **5.4 The Role of the Chief Executive Officer (CEO)**

5.4.1 The CEO has the delegated responsibility for the operation of the Trust including the performance of the Trust's academies.

5.4.2 The CEO is the accounting officer so has overall responsibility for the operation of the Trust's financial responsibilities and must ensure that the organisation is run with financial effectiveness and stability; avoiding waste and securing value for money.

5.4.3 The CEO leads the executive management team of the Trust. The CEO will delegate executive management functions to the Trust Central Team and is accountable to the Board of Trustees for the performance of the Trust Central Team.

## **5.5 *The role of the Academy Performance Review Committees (where required)***

5.5.1 As with Trust Committees, APRCs are appointed by the Board, and so delegation can be removed at any time.

5.5.2 Typically, functions may include:

- Building an understanding of how the school is led and managed;
- Engaging with stakeholders;
- Being a point of consultation and representation.

## **5.6 *The role of the Headteacher***

5.6.1 The academy Headteacher is responsible for the day-to-day management of the academy and is managed by the Chief Executive but reports to the Board of Trustees and Academy Performance Review Committees (where applicable) on matters which have been delegated to it.

## Delegation Grid Key

### Columns

Column 1: Members

Column 2: Board of Trustees of Ethos Academy Trust

Column 3: Finance, Audit and Risk Committee

Column 4: People and Culture Committee

Column 5: Learning and Achievement Committee

Column 6: Chief Executive Officer

Column 7: Chief Finance and Operations Officer

Column 8: Central (Executive) Leadership Team

Column 9: HR Manager

Column 10: Academy Performance Review Committee (if applicable)

Column 11: Headteacher

Column 12: Governance Professional

### Key

**A - Approve**

**R - Recommend**

**D - Develop**

**I - Implement**

**M – Operationally Monitor and Report**

**S – Strategically Monitor**

<b>KEY:</b> <b>A – Approve</b> <b>R – Recommend</b> <b>D - Develop</b> <b>I – Implement</b> <b>M – Monitor and Report</b> <b>S – Strategic Monitoring</b>		MEMBERS	TRUSTEES	FINANCE, AUDIT AND RISK	PEOPLE & CULTURE	LEARNING & ACHIEVEMENT	CEO	CFOO	CENTRAL LEADERS HR, FINANCE, DoE	CENTRAL LEADERS - ALL	APRC	HEADTEACHERS	Governance Professional
1.	<b>STRATEGY</b>												
1.1	Growth Plan		A				R			D			
1.2	Trust Strategic Plan: agreeing key priorities and KPIs		A S Sep				R Sep			D June			
1.3	Admission of new schools to Trust		A				R			D			
2.	<b>GOVERNANCE</b>												
2.1	Members: Appoint / Remove	A	R										
2.2	Trustees: Appoint / Remove (the majority of Trustees must be appointed by Members)	A	R				D			I			I
2.3	Board Committee Chairs: Appoint / Remove		A	R	R	R	R						
2.4	APRC Chairs: Appoint / Remove		A				R				R	R	
2.5	Appointment of Trustee to APRCs.		A										
2.6	Changes to Governance Structures and functions (Committees)		A				R						
2.7	Changes to Scheme of Delegation: review / agree annually		A				R			D			D
2.8	Determine level of delegation to APRC of each academy: review / agree annually		A				R						
2.9	Terms of reference for committees of the Board of Trustees: review / agree annually		A	I	I	I				D			D
2.10	Approval of Terms of Reference for APRCs.		A										
2.13	Annual schedule of Board, Committee and APRC meetings		A				I D	I		R	I		I D

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2.14	Appoint and remove Clerks to Board and APRCs		A										
2.15	Appoint Board Advisors		A				R						
2.16	Maintenance of Register of Interests		I								I		D
2.17	Approval of Trust policies not referenced under other sections		A										
2.18	Format for Head teacher Report for APRC (supported)										A	D I	
2.19	Format for Head teacher Report for APRC (unsupported)										A	D I	
2.20	Appointment and removal of MAT Appointed Governors to APRC (supported)						R				A	R	
2.21	Appointment and removal of MAT Appointed Governors to APRC (unsupported)				A		R				R		
2.22	Annual report works of APRC: submit to Trust and publish		S				S				M I	D I	
2.23	Trustee performance monitoring through periodic review	S	A				R						
2.24	APRC performance monitoring through periodic review		A				R				I	R	
2.25	Complaints Policy		A				R	D					
2.26	Hearing complaints* See Complaints Policy for procedure		I				I	I			I	I	

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3.	<b>STATUTORY REPORTING</b>												
3.1	Trust Annual Accounts (including accounting policies, signed statement on regularity, propriety and compliance, incorporating governance statement demonstrating value for money).	S	A Dec	R Nov			DI	DI Nov					
3.2	Response to Auditors' Management Letter		S	A Dec				I Nov					
3.3	Appointment/Removal of external auditors	A	R	S				R Jan					
3.4	Budget Forecast Return		A July	R July			M A	I May					
3.5	Other Accounting Returns DFE/ EFSA (including BFRO revised plan)						M A	I					
3.6	Pension EOYC						M	I A Sept					
3.7	Payroll Annual return (inc P11D)						M	I A					
3.8	Corporation Tax						M	I A May					
4.	<b>SYSTEMS OF INTERNAL FINANCIAL CONTROL</b>												
4.1	Internal financial control procedures			A			M	I R					
4.2	Financial regulations and associated policies			A Jan			M	I R Dec					

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4.3	Appointment of Internal Auditors and agree audit plan			A July				I R Apr					
5.	<b>BUDGET AND MANAGEMENT REPORTING</b>												
5.1	Trust Budget – 3 Year Plan		A	R				M D		I			
5.2	Academy Budgets – 3 Year plan						A	M D			R	IR	
5.3	Academy Monthly Management Accounts and Budget updates			S			M	D I					
5.4	Central spend / top slice: review and agree			A S			M R	R D I					
5.5	Effective use of benchmarking to ensure robustness / value for money at Trust and academy level – <i>Approval via SRMA return (part of 3.5)</i>		S	M			M	R D I		I	I	I	
5.6	Development and review of Trust Business Plan		S	A M			D M I	D I		D I			
5.7	Budget virements over £10,000		S	A				R I					
5.8	Budget virements under £10,000			S				A M					
6.	<b>PURCHASING AND PROCUREMENT</b>												
6.1.a	Academy/ Trust - Enter into a contract for new services >£25k in total and for a fixed term >3 years (e.g. 4 year fixed plus a 2-year option)		A				M	I R			R	I	
6.1.b	Academy/ Trust - Enter into a contract for new services <£25k in total and for a fixed term >3 years (e.g. 4 year fixed plus a 2-year option)			A			M	I R			R	I	
6.1.c	Academy/ Trust – Renewal of a contract >£50k in total and for a fixed term no longer than 4 years (plus a 2-year option)		A				M	I R			R	I	

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6.1.d	Academy/ Trust – Renewal of a contract >£25k <£50k in total and for a fixed term no longer than 4 years (plus a 2-year option)			A			M	I R			R	I	
6.1.e	Academy/ Trust – Renewal of a contract <£25k in total and for a fixed term no longer than 4 years (plus a 2-year option)			S			A	I M R			R	I	
6.2.a	Academy/ Trust - Enter into a new contract above £50,000 (total contract value) for the minimum fixed term <3yrs		A	S			M	I R			R	I	
6.2.b	Academy – Replace an existing contract above £50,000 (total contract value) for the minimum fixed term <3yrs			A			M	R			R	I	
6.3.a	Academy - Enter into a new contract above £25,000 to £50,000 (within Budget, <3yrs)			A			M	R					
6.3.b	Academy - Enter into a replacement contract above £25,000 to £50,000 (within Budget, <3yrs)			S			A	M R					
6.4	Academy/ Trust - Enter into new contracts between £5,000 – £25,000 (within Budget, <3yrs)			S			A	I M R				R	
6.5	Academy/ Trust - Enter into contracts below £5,000 (within Budget)							A I M				A	
6.6	Purchasing – approve non-capital expenditure via Purchase Order or Non-Order Invoice above £25,000 (not budgeted) - Trustee approval delegated to Chair or Vice Chair		A	S				R I M					
6.7	Develop, review and approve Trust wide procurement strategies and efficiency savings programme			S			A	R D I M		D I			
6.8	Purchase orders or non-order invoice should follow the same approval as for above contracts (total cost of PO or invoice – net of VAT)	See above											
	Quotes and tender limits for above: <ul style="list-style-type: none"><li>A quotation or price comparison for potential purchases must always be obtained before any order is placed to ensure that best value is achieved. The use of government approved frameworks can be used instead of obtaining quotations/tenders.</li><li><b>Up to £4,000</b> – 1 written or verbal quote to be documented. If via an approved catalogue, clear reference to the items needs to be made on the order form.</li><li><b>£4,001 - £49,999</b> - 3 written quotes requested from a written specification with a documented rationale for the decision made.</li><li>Items <b>£50,000 and over</b> – to be formally tendered.</li><li>Further guidance is included in the Trust procurement policy. Values above are total contract value across all years of the contract or Purchase Order.</li></ul>												

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7.	<b>BANKING AUTHORITY AND CASH MANAGEMENT</b>												
7.1	Investments			AM			M	R I					
7.2	Open new bank accounts			AM			M	R I					
7.3	New credit cards						A	I M					
8.	<b>TRANSACTION PROCESSING</b>												
8.1	BACS – approve BACS runs							A					
8.2a	Approve Trustee, CEO and employee expenses over £1,000 (except own – all expenses must be signed by staff higher in the structure CEO by Chair of Trustees)		A				R	I					
8.2b	Approve Trustee, CEO and employee expenses between £500 and £999 (NB- all expenses must be signed by staff higher in the structure)						A						
8.2c	Approve expenses below £500 (see above)							A				A	
8.3	Income – account for and monitor all grant income as per grant restrictions							R I M					
8.4	Control Account Reconciliation							A					
8.5	Write-off bad debts under £2,500			S			A	R					
8.6	Write-off bad debts over £2,500		S	A				R					

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9.	<b>FIXED ASSETS</b>												
9.1	Asset Register – completion of accurate register for each setting							I M					
9.2	Addition of fixed asset expenditure over £25,000 (cumulative for the capital plan since last approval – per setting)			A			R	R				R	
9.3	Addition of assets over £1,000 (add to capital plan)			S			A	R				R	
9.4	Disposal of assets with a net book value of up to £2,500 (at any year in 1 setting)						A	R					
9.5	Disposal of assets with a net book value of £2,500 or over			A				R					
9.6	Purchase or sale of freehold or leasehold property	Requires ESFA approval – recommended by the Board											
10.	<b>STAFF AND PAY</b>												
10.1	Approval of new or replacement Headteacher post						A		D		R		
10.2	Approval of new academy staffing structure						A		D			R I	
10.3	Approval of new central team staffing structure			A			R I	D	D I	D			
10.4	Undertake the recruitment process and appointment of Head Teacher		M				A D I		D I		R		
10.5	CEO and CFOO: Appoint / Dismiss		A				R (for CFOO)		D I				
10.6	Undertake the recruitment process and appoint other Central Team roles						A	R	D R	DI			
10.7	Undertake the recruitment process and appoint Academy leadership roles (other than Headteacher)								D I		R	A	
10.8	Undertake the recruitment process and appoint other academy teaching and support roles								M D			AI	

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10.9	Termination of employment: severance <£2.5k above contractual entitlement						A					A	
10.10	Termination of employment: severance >£2.5k above contractual entitlement or compromise agreement		A				R		R			R	
10.11.a	Academy - New job descriptions, job evaluations and pay grade change								RDI			DIA	
10.11.b	Trust - New job descriptions, job evaluations and pay grade change						A		RDI				
10.12	Restructures, redundancies processes		A	R			RI	RI	DI				
10.13	Suspension/return of Head teachers						IA		DIR				
10.14	Suspensions/return of school teaching and support staff								DIR			A	
10.15	Undertake an investigation relating to the Headteacher under a HR policy						A		DIR				
10.16	Undertake an investigation relating to a school-based employee under a HR Policy								DIR			AI	
10.17	Take formal action relating to a Headteacher under a HR policy		A				R		DI				
10.18	Take formal action relating to a school-based employee under a HR policy								DIR			A	
10.19	Take part in formal HR Hearings / Appeals		I				I		DR			I	
10.20	Inflationary pay increases			A				D R					
10.21	Undertake CEO performance review process				A I M				I R				
10.22	CEO pay progression within Pay Range				A				IR				
10.23	Change to Central Team Leader Pay Range			A	R		R						
10.24	Central Team Pay Progression within Pay Range						A	R	R	R			

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10.25	Undertake Headteacher performance review process				S		A I		A I (DoE)				
10.26	Headteacher pay progression within ISR				A		R		R (DoE)				
10.27	Change to Headteachers ISR				A		R	D	R (DoE)				
10.28	Undertake School leadership members’ performance review process (other than Headteacher)						S		S (DoE)		M	A I	
10.29	School Leadership members pay progression/change of ISR (other than Headteacher)				A		M R		M R (DoE)			R	
10.30	Teachers’ and support staff performance review process and pay progression				A		M R		M R (DoE)			M R	
10.31	Authority to approve forms effecting pay, new starters, changes and leavers						A					A	
10.32	Authority to approve additional hours / overtime (required in advance of the hours being worked)							A				A	
10.33	Authority to negotiate and approve termination payments (ESFA approval needed if over £50k)		A				R	R	R			R	
10.34	Authority to instruct payroll provider to process BACS payments for each payroll run						A	A					
10.35	Giving of gifts (e.g. as a thank you to a speaker)		Up to £25 per item. No more than £250 in any one year the value of the gift must be reasonable, and the decision must be fully documented. No alcohol related gifts. No novel payments or contentious gifts.										
10.36	Receiving of gifts and hospitality		Up to £25 per item. No more than £100 worth in any one year. Must be recorded in the Gifts and Hospitality record. No novel or contentious gifts										
	Novel payments or other transactions are those which the academy Trust has no experience of or are outside the range of normal business activity for the Trust. Contentious transactions are those, which might give rise to criticism of the Trust by Parliament, and/or the public, and/or media.												

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11.	<b>PERFORMANCE AND CURRICULUM</b>												
11.1	Academy SEF / Development Plan						A		M		D	R D Jul	
11.2	Review progress against Academy Development Plan						S		S		M	I	
11.3	Curriculum Intent					A	R		R			D I	
11.4	Academy KPIs					A S	R		R			D I	
11.5	Complaints					S	M		M			I	
12.	<b>ADMISSIONS</b>												
12.1	Agree Admissions arrangements in consultation with APRCs					A	R		R		M	D I	
12.2	Publish admissions arrangements/policies						M		M			I	
12.3	Admittance over PAN/refusal of place						M		M		R	A	
13.	<b>PUPIL BEHAVIOUR</b>												
13.1	Fixed term Exclusion					S	M		M			A	
13.2	Permanent Exclusions					S	M		M			A	
13.3	Appointment of panel to hear appeals against a permanent exclusion		A				I M		I M				
14.	<b>SCHOOL ORGANISATION</b>												
14.1	Approval of changes to academy times of day					A	M		M		M	R I	
14.2	Term Dates / INSET Dates						A		R			R I	

<b>KEY:</b> <b>A – Approve</b> <b>R – Recommend</b> <b>D - Develop</b> <b>I – Implement</b> <b>M – Monitor and Report</b> <b>S – Strategic Monitoring</b>		MEMBERS	TRUSTEES	FINANCE, AUDIT AND RISK	PEOPLE & CULTURE	LEARNING & ACHIEVEMENT	CEO	CFOO	CENTRAL LEADERS - DoE	CENTRAL LEADERS - ALL	APRC	HEADTEACHERS	Governance Professional
15.	<b>RISK, HEALTH AND SAFETY</b>												
15.1	Health & Safety Policy			A			M	D R					
15.2	Risk Management Strategy / Processes (including review of Trust Strategic Risk Register and Academy Risk Registers)			A			M	D R I				I	
15.3	Report on Risks to Board			S			M	R					
15.4	Academy Emergency Plan			A				M		D	M	D I	
15.5	Trust Business Continuity Plan			A				D R					
15.6	Oversight and management of conflicts of interest		A S				M	R I	R I	R I	R I	R I	
16.	<b>PREMISES AND INSURANCE</b>												
16.1	Statutory compliance testing			S			M	D I					
16.2	Fire risk assessment and Asbestos risk assessment			S			M	D I					
16.3	Action plans in relation to safety of sites including buildings conditions			S			M	D I			M	D I	
16.4	Trust Premises & Capital Strategies			A				M I		D			
16.5	Source Trust insurance including RPA, minibus and staff absence							I					
16.6	Insurance Claims			S				I					
16.7	H & S Incidents			S				M				I	
17.	<b>SAFEGUARDING</b>												
17.1	Safeguarding audits					S	M		M		M	I	

<b>KEY:</b> <b>A – Approve</b> <b>R – Recommend</b> <b>D - Develop</b> <b>I – Implement</b> <b>M – Monitor and Report</b> <b>S – Strategic Monitoring</b>		MEMBERS	TRUSTEES	FINANCE, AUDIT AND RISK	PEOPLE & CULTURE	LEARNING & ACHIEVEMENT	CEO	CFOO	CENTRAL LEADERS - DoE	CENTRAL LEADERS - ALL	APRC	HEADTEACHERS	Governance Professional
17.2	Implementation of actions from Safeguarding audits					S	M		M		M	I	
17.3	Safeguarding training						S		S	M	M	I	
17.4	Reporting of Safeguarding/CP concerns					S	M		M		M	R I M	
17.5	LADO Referrals		S				M		M	I	M	I	
18.	<b>ICT, DATA PROTECTION AND COMPLIANCE</b>												
18.1	Trust ICT Strategy			A S			M	D I	I	I		I	
18.2	GDPR Compliance			S			M	D I	I	I		I	
18.3	Legal cases		S	M			M	M I	M I	M I		I	
18.4	Publication on Trust and Academy Websites of all required details on governance arrangements		S				I M					I	
18.5	Annual report on performance of the Trust: submit to Members and publish	S	M				D I	D I	D I	D I			
18.6	Compliance with the requirements of the Master and Supplemental Funding Agreements			S			M	D I					
18.7	Compliance with Academies Financial Handbook			S			M	M D I	I	I	I	I	