



Scheme of Delegation

Contents

1. Rationale	4
2. General Information	7
3. Central Functions	10
4. Financial Delegated Authority	11
5. HR Levels of Authority	17
6. Operational Level of Authority	22
Appendix 1	28

Version History

Approved by:	Trustees
Last reviewed:	July 2026
Next review due by:	July 2027

Date	Author	Version	Comment
19 th July 2019	Board of Trustees	1	Minor changes approved
11th October 2019	Board of Trustees	2	
30 th September 2021	Board of Trustees	3	
30 th September 2022	Board of Trustees	4	
September 2023	Board of Trustees	5	Review and amend in line with PCR Procurement thresholds.
1 September 2024	Board of Trustees	6	
1 December 2024	Board of Trustees	7	Increase 3 quote threshold to £3,999
August 2025	Board of Trustees	8	Page 8 – Ordering goods and services up to £3,999 – approval must be sought and limit updated to £214,904 Page 4 – Values and Ambitions Page 6 – Director list updated Throughout – Director of HR updated to Director of People Throughout – Director of Business and Development updated to Chief Operations officer Page 16 – Central Team term-time holiday approval added
July 2026			Update to thresholds / limits for authorisation plus closure of schools to include COO

1. Rationale

This Scheme of Delegation sets out the governance framework of Enquire Learning Trust and defines the responsibilities, decision-making authority and reporting arrangements of Members, Trustees, Committees, Academy Improvement Committees (AICs), the Chief Executive Officer, Executive Leadership Team and academy leaders.

The Trust operates in accordance with:

- The Academy Trust Handbook 2026, effective from 1 October 2026;
- The Trust's Articles of Association;
- The Master Funding Agreement with the Department for Education (DfE);
- Company and Charity Law; and
- All relevant statutory and regulatory requirements.
- DfE expectations on inclusion, collaboration, financial transparency, procurement, executive pay, internal control and trustee financial knowledge.

The purpose of this Scheme of Delegation is to provide clarity regarding who has authority to make decisions on behalf of the Trust whilst ensuring effective governance, accountability and oversight.

Accountability and Delegation

The Board of Trustees is the Trust's key decision-making body and retains ultimate responsibility and accountability for all aspects of the Trust's operation, including:

- Strategic leadership and direction;

- Educational performance and outcomes;
- Financial sustainability and solvency;
- Risk management and internal control;
- Safeguarding and pupil welfare;
- Estates, health and safety, and compliance; and
- Compliance with statutory, contractual and regulatory obligations.

Whilst the Board may delegate functions to Committees, Academy Improvement Committees, the Chief Executive Officer and other executive leaders, accountability cannot be delegated. The Board remains accountable for all decisions taken in the name of the Trust and must receive sufficient assurance that delegated responsibilities are being exercised effectively and in accordance with Trust policies and statutory requirements.

The Board must meet at least three times each year and must ensure that all decisions are made in accordance with the Seven Principles of Public Life, the Trust's charitable objects, company director duties, charity law, the funding agreement and the Academy Trust Handbook.

Principles of Delegation

Delegation within Enquire Learning Trust is underpinned by the following principles:

- **Clarity** – responsibilities and decision-making authority are clearly defined.
- **Accountability** – those exercising delegated authority are accountable through established reporting arrangements.
- **Transparency** – decisions are taken openly and recorded appropriately.
- **Assurance** – Trustees receive regular information and evidence regarding performance, risk and compliance.

- **Subsidiarity** – decisions should be taken at the most appropriate level whilst maintaining consistency across the Trust.
- **Compliance** – all delegated functions must be exercised in accordance with Trust policies, the Academy Trust Handbook and applicable legislation.

Role of Academy Improvement Committees

Academy Improvement Committees provide local challenge, support and assurance on behalf of the Trust. They play an important role in strengthening community engagement, understanding local context and supporting academy improvement.

AICs operate within the authority delegated by the Board of Trustees and as defined within this Scheme of Delegation. Their role is primarily advisory and supportive. Responsibility and accountability for educational standards, financial oversight, safeguarding and statutory compliance remain with the Board of Trustees.

Assurance Framework

The Board of Trustees obtains assurance regarding the effectiveness of delegated functions through:

- Trustee Committees;
- Academy Improvement Committees;
- Internal scrutiny;
- External audit;
- Executive leadership reporting;
- Academy self-evaluation and improvement processes;
- Risk management arrangements; and

- Compliance and safeguarding monitoring.

These arrangements enable Trustees to discharge their responsibilities effectively whilst maintaining strategic oversight of all Trust activities.

Trustees, committee members and those exercising delegated financial authority are expected to maintain appropriate financial knowledge and undertake relevant training so that they can provide effective oversight, challenge and assurance in line with the Academy Trust Handbook 2026.

Trustees must keep the Trust's governance structure, board composition and committee arrangements under review, ensuring that committees include a majority of trustees where required and that no person acts as a de facto trustee or shadow director.

This Scheme of Delegation should be read alongside the Trust's Articles of Association, Terms of Reference, Financial Regulations, Governance Handbook and relevant Trust policies.

2. General Information

Values and ambitions

We believe that all learners can be powerful learners given access to extraordinary learning experiences. We want children and the academies they attend to be confident, successful and ambitious.

We envisage a Trust where well led, highly skilled and committed professionals collaborate, learn and innovate together to ensure that all academies are successful and where all learners have access to effective and innovative provision that meets their needs and aspirations.

We want to add value to achievement and raise standards. We also want to change lives. We know this requires our provision and our practice to be world class – because of the distance we have to travel, we understand that good will not be good enough and that we need to develop a shared appreciation of excellence and then strive to enact this every day.

We take learning seriously and work together to create a vibrant culture in which this can happen. We know that it's what we do that counts and that our thinking must be visible in classrooms if it is to have leverage. Children are at the forefront of all that we do and aspire to do. We take serious steps to engage them, to hear their voice in authentic ways and then to use their insight and expertise to develop radical pedagogies that taps into their passions and interests and use the potential of emergent technologies.

Inclusion and Collaboration

The Trust is committed to inclusive practice, collaboration between academies and with partners, and the early identification of need. Trustees and executive leaders will receive assurance that academies are working collaboratively to secure strong outcomes, support pupils with SEND and additional needs, and contribute to the wider school system.

Assurance and Accountability

Trustees receive assurance through: Academy Improvement Committees, Audit and Risk Committee, Standards Committee, Finance and People Committee, Internal scrutiny, external audit and executive leader reports.

The purpose of these arrangements is to provide Trustees with sufficient evidence that delegated functions are being discharged effectively and that statutory responsibilities are being met.

The Audit and Risk Committee advises the Board on the adequacy of the Trust's controls, risk management and assurance framework. The Board must ensure an appropriate, reasonable and timely response to audit and internal scrutiny findings, taking opportunities to strengthen financial management and control.

Members

Members are the ultimate layer of governance in the Trust. They appoint and remove Trustees, amend our Articles of Association and hold our Trustees to account.

The Trust must have at least three members and should have five or more. Members must not be employees of the Trust or occupy staff roles on an unpaid voluntary basis. Suitability checks must be completed to confirm that members are not subject to a direction under section 128 of the Education and Skills Act 2008.

Trustees

The Board of Trustees retains ultimate responsibility and accountability for the Trust, including educational performance, financial sustainability, risk management, safeguarding, estates, compliance and strategic leadership. Whilst functions may be delegated through this Scheme of Delegation, accountability remains with the Board of Trustees at all times in accordance with the Academy Trust Handbook.

Trustees must take ownership of the Trust's financial sustainability, ability to operate as a going concern, regularity, propriety and value for money.

Academy Improvement Committee

Academy Improvement Committees operate primarily in an advisory capacity, providing local challenge, support and assurance. Any delegated authority is limited to that expressly set out within this Scheme of Delegation. Responsibility and accountability remain with the Board of Trustees.

Directors

The Trust Directors are appointed to manage the business and academy improvement strategies of the Trust within the parameters set by Trustees. Working within these parameters, Directors have the responsibility for the day-to-day management of the Trust's operations and Academy improvement.

Directors are invited to attend termly Trustee meetings as and when required.

Composition of Academy Improvement Committees

Type of Member	Number	Term of Office	How they are elected
Principal	Up to 3	Indefinite	By the Board of Trustees
Trust Representative	1	Indefinite	By the Board of Trustees
Parent	2	Until their child leaves the academy	By the Board of Trustees
Community	Up to 3	4 years	By the Board of Trustees
Clerk	1	Indefinite	By the Board of Trustees

3. Central Functions

As part of the Trust, we aim to have the greatest amount of impact with efficacy. A contribution of 6.8% from each academy's GAG income enables access to a whole range of functions and services provided or procured centrally.

Named authority

Board of Trustees	Trustees
Chief Executive Officer / Accounting Officer The Accounting Officer is responsible for regularity, propriety, value for money and assuring the Board that the Trust complies with its funding agreement and the Academy Trust Handbook.	CEO/Darren Holmes
Chief Finance Officer	CFO/Jodie Osbourne For larger trust appointments, the CFO should be a qualified accountant and a member of a relevant professional accountancy body and/or hold the CIPFA Level 7 qualification, in line with the Academy Trust Handbook 2026 expectation. The Trust must have appropriately qualified and/or experienced finance staff to support sound financial management, internal control and compliance reporting.
Directors	Lauren Pilgrim - Chief Operations Officer Liz Thompson - Director of Governance and Development Leah Collins – Director of People Brett Webster - Director of Information Technology Jaimie Holbrook - Director of Improvement and Effectiveness (Development Lead) Rebecca Clayton - Director of Improvement and Performance (Development Lead) Delyth Linacre – Director of Early Years (Development Lead) Anne Munro – Director of SEND Kelly Holden – Director of Facilities and Sustainability

4. Financial Delegated Authority

Financial Delegated Authority
Budget Setting
Annual budgets require authorisation by the Chief Financial Officer prior to being presented to Trustees for approval via the Finance and Human Resource Committee. Directors and the Central Team must seek approval from the CFO for all expenditure relating to the central function via the Office Manager – in line with procurement limits set out below. Principals will submit their Academy Improvement Plan and Summary SEF with relevant costings to the Standards Committee before the end of September each year. AIP must include a financial summary outlining expenditure. Academy staffing costs must be at or below 75% of income. Budget setting and financial reporting must include consideration of going concern, financial sustainability and how funding is distributed across academies, with appropriate reporting to Trustees. The Board must approve a balanced budget for each financial year and minute its approval. Management accounts must be shared with the Chair of Trustees monthly and considered when the Board meets, with timely action taken to maintain financial viability.

Delegated Duty	Value	Delegated Authority	Comment
Applicable procurement threshold in force under current procurement legislation and DfE guidance for all goods and most services is £207,720. A 'light touch regime', with a higher threshold of £663,540 applies for some services that are specifically for education provision. We will seek legal advice to determine if any procurement run by the Trust qualifies. Director of Governance (Liz Thompson) to be involved in all new contracts or contract renewals to ensure GDPR compliance DfE designated procurement frameworks must be used where required or expected, including education supply staff and energy frameworks. All Management Information System contracts must be aligned with the DfE MIS framework by September 2027. Any alternative route must demonstrate compliance with procurement legislation, value for money and Trust financial controls. From September 2026, supply staff must be procured through the Government Commercial Agency Supply Teachers and Education Recruitment framework unless a compliant alternative route is secured under procurement legislation and the alternative does not exceed the framework rates.			
Approving adverse variances compared to the most recent budget or forecast	Unlimited	Chief Financial Officer	Reports to Finance Committee
Ordering goods and services (including advertising of Tenders and award of contracts)	Up to £1000	Principal	Credit card to be used for purchases below this threshold.
	£1001 - £5000	ABM/Principal/Director	Preferred suppliers to be used from spreadsheet, if not then 3 quotes required.
	£5001 - £25,000	Finance Managers (CFO/ COO to have oversight)	3 written quotes to be sent to Finance managers for approval.
	£25,001 - £50,000	CFO	3 written quotes to be sent to CFO for approval.
	£50,001 - £100,000	CFO and COO (procurement lead to be notified)	3 quotes to be sent to CFO and COO for approval
	£100,001 - £207,000	CEO	3 quotes to be obtained, at least 1 quote from a framework, 1 quote from another supplier and 1 other. Must be on advertised on Trust website.

	£207,001 – above	Trustee approval	Full procurement tender
Capital Projects	All projects	Chief Operations Officer	Annual capital programme to be approved by Trustees
To determine services to be included in Operational Services Framework	All services	Trustees	All academies to operate under the Operational Services Framework. Academies must use services provided centrally.
Contract Management	All services/products	Director of Governance	ALL contracts to be signed by the Director of Governance / CEO / CFO or COO
Novel, Contentious or Repercussive Transactions	All	Trustee / Accounting Officer	Must comply with Academy Trust Handbook 2026 requirements. Prior DfE approval must be obtained before entering into any novel, contentious or repercussive transaction where required. Such transactions must be treated separately from ordinary delegated financial authority. Related party transactions must be identified, declared and managed in accordance with the Academy Trust Handbook. Intended related party transactions must be reported to DfE before being confirmed, and prior approval must be obtained where required, including qualifying expenditure transactions over £40,000. Conflicts of interest must be identified, declared, recorded and managed. The Trust must be even-handed in its treatment of related parties and must ensure that goods or services provided by related parties are at no more than cost, beyond the limits permitted by the Academy Trust Handbook.

Delegated Duty	Value	Delegated Authority	Comment
Authorising monthly salary payments	Unlimited	CFO and Chief Operations Officer	All significant variances to be reported to Trustees
Signatures for Cheques, BACS payment Authorisations and other bank transfers	Up to £10,000	Any two signatures in line with the Bank Mandate	Cheques only to be used in an emergency
	Any amounts over £10,000	Two signatures in accordance with the bank mandate	
Signatories for grant claims and DfE Returns	Unlimited	Signatories from the following (as required): Accounting Officer Chief Operations Officer CFO	Signatories as required by DfE.

Delegated Duty	Value	Delegated Authority	Comment
Disposal of assets	Up to £500	Principal	CFO to report to Trustees
	Over £500	CFO	Prior approval from Trustees via CFO
	Over £20,000 (if purchased via grant) and disposal of land and buildings	CFO and Secretary of State	Prior written consent from Secretary of State of Education via the CFO
Write-off bad debts	Up to £1000	CFO	
	Over £1,000	Trustees CFO plus DfE approval (where the debts are more than 1% of total annual income or £45k (whichever is smaller), per single transaction, cumulatively 5% of total annual income as long as have 2 years of timely unqualified submitted accounts).	Report to Trustees The Trust must maintain clear records of write-offs, losses and special payments and seek DfE approval in advance where the Academy Trust Handbook requires this.
Write-off overpayments to staff	Up to £1,000	CFO	Limit as per DfE apply as included in write off of bad debts.
Purchase or sale of freehold property	Any	Trustees, CEO plus DfE approval required	Secretary of State approval required
Granting or taking up of any leasehold or tenancy agreement exceeding 3 years	Any	Trustees, CEO plus DfE approval required	Secretary of State approval required

Any guarantees, indemnities and letters of comfort entered into	Any	Trustees, CEO plus DfE approval required	
Ex-gratia payments	Any	Trustees, CFO plus DfE approval required	
Severance Payment	Up to £50,000	CEO	Termly reports provided to Trustees. Special severance payments must comply with the Academy Trust Handbook 2026 and HM Treasury guidance. Any severance payment in excess of £50,000, or otherwise requiring approval under the current rules, must be referred to the Secretary of State for Education before agreement. Settlement agreements and severance arrangements must not be used to avoid disciplinary action, poor performance management or statutory obligations, and must be supported by a clear business case demonstrating regularity, propriety and value for money.
ICT Procurement	Any	Director of ICT	All procurement of ICT must be through the Director of ICT Management Information System contracts must be reviewed so that Trust arrangements align with the DfE MIS framework by September 2027.

5. HR Levels of Authority

HR Levels of authority	
APPOINTMENTS	
All appointment panels must contain at least one member who has undertaken Safer Recruitment Training. The CEO may nominate an alternative representative if they are unavailable to make up a panel.	
All academy- based appointments require prior approval from CFO and Director of People.	
CEO	Board of Trustees
Chief Operations Officer/Chief Financial Officer	Trustee, CEO and 1 other as determined by the CEO
Directors	Trustee, CEO and 1 other as determined by the CEO
Principal	Trustee/CEO, Director and 1 other as determined by the CEO
Vice Principals	CEO, Principal and 1 other as determined by the CEO
Assistant Principals and SLT Support Staff	Principal, Vice Principal and 1 other as determined by the Principal
TLR Posts (existing post)	Principal
All other Teaching posts	Principal and 1 other as determined by the Principal
All Support Staff posts (other than SLT posts)	Principal and 1 other as determined by the Principal
All Business Manager or Finance post	Principal, CFO and 1 other as determined by the Principal

DISCIPLINARY CASES AND DISMISSALS

For all disciplinary cases and dismissals the following delegation model shall apply :

Disciplinary

Capability (professional competence)

Ill Health Capability

Redundancy

Some other substantial situation

For all disciplinary cases and dismissals, the following delegation model shall apply:

Posts	Delegated Authority	Appeal
CEO	Board of Trustees	3 Trustees
Directors including CFO	Trustee or CEO	3 Trustees
Principal	Trustee or CEO	3 Trustees
Vice Principal and SLT Members	Trustee or CEO	CEO or Trustee
All other Academy posts	Principal	Director, Director of People/nominated person, AIC Member
All other Central team posts	Director of People or CEO	Trustee, CEO, Chief Operations Officer

GRIEVANCE		
Posts	Delegated Authority	Appeal
CEO	Board of Trustees	Chair of Trustees
Directors	Trustee or CEO	Trustees
Principal	Director of People or CEO	Trustee, CEO or Director
Vice Principal/SLT Member	Principal	Director of People, AIC Member
All other Academy posts	Principal	AIC Member, Director of People / nominated person
All other Central team posts	Director of People or CEO	Trustee / CEO

OTHER HR FUNCTIONS	
Function	Delegated Authority
All settlement agreements	Principal and Director of People to agree terms – CEO to approve. Report to be received by Trustees Where a settlement agreement includes a special severance payment, DfE approval must be obtained before any binding offer is made where required by the Academy Trust Handbook.
Teachers Pay – NPS, Threshold/UPS	Principal with Director for improvement
Staffing restructures	CFO, Director of People and Principal (where appropriate)
Decision to make redundancies	Principal and Director of People
Authorisation of redundancy/early retirement payments	CFO or Director of People
Determination of CEO's salary/pay grade	Trustees on recommendation from Finance Committee Executive pay decisions must comply with the Academy Trust Handbook 2026. Where DfE approval is required for senior pay, approval must be obtained before the role is advertised or pay is agreed. Executive pay increases must not exceed the rate of teachers' pay increases unless expressly permitted by DfE requirements.
Determination of pay progression of Principal	CEO reported to the Finance Committee and Trustees on the basis of Performance Management
Determination of pay progression of Directors	CEO recommendation to the Finance Committee to be agreed by the Trustees on the basis of Performance Management
Pay progression: Business Manager Support Staff	Principal with CFO Principal

Variation to contracts of employment	Principal with involvement from Director of People and CFO
Ensure all HR policies are implemented	Principal is responsible to ensure all staff work within the HR policies.
Administration of employment contracts, pay and conditions of services (with the exception of previous delegated authorities)	Director of People (with reference to the CEO, CFO or Chief Operations Officer as appropriate).
Ensure all staff have appropriate qualifications for the appointed role.	School based staff – Principal Central staff – Director of People.
To ensure that the apprenticeship levy is used effectively, and impact is reported to Trustees	Principal and Director of People
To ensure all staff have access to the Trust professional development offer	CEO and Principal
Central Team term-time holidays	All central staff to seek approval from CEO.

6. Operational Level of Authority

Operational Level of authority		
Delegated Duty	Delegated Authority	Comment
Admissions	Trustees	All academies will follow the Trust's Admission Policy
Health and Safety	Director of Estates and Sustainability	It is the responsibility of the Trustees to ensure that health and safety laws are adhered to and the appropriate health and safety certificates are in place. The operational compliance of this function will be delegated on a day to day basis to the Chief Operations Officer and their team.
Income Generation	Principal	
Insurance	Chief Operations Officer	Insurance for our academies will be procured through the government's RPA scheme unless agreed otherwise by the Chief Operations Officer. Energy procurement must use DfE designated procurement frameworks or approved energy partners where required or expected, unless an alternative compliant route is approved and documented.
Staff absence insurance	Director of People	To ensure all academies have appropriate cover in place with the correct provider
Investments	Trustees	CFO continuously reviews investment options and reports to the Trustees
Permanent Exclusions	Principal and Academy Improvement Committee	All academies will follow the Trust's Exclusions Policy for permanent exclusions and, where possible, work with the Local Authority to ensure independent permanent exclusion appeals.
Published Admission Number (PAN)	Trustees	The PAN must be set each academic year. There are consultation requirements where the PAN is being amended.
Variation to PAN outside of consultation period	CEO	Any changes to increase or reduce PAN outside of the consultation round will be taken to the Trust Leadership Team and approved by CEO
Service Level Agreements / Contracts	Chief Operations Officer	Depending on the context of each academy, each academy may have different SLAs / Contracts in place. It is the responsibility of the Business Manager, working with the Chief Operations Officer or CFO, to manage local SLAs and contracts. From time to time the Trust may procure SLAs on behalf of all academies as part of a best value review.

Safeguarding	Principals	Trustees will, in respect of each academy, act in accordance with, and be bound by, all relevant statutory and regulatory provisions for safeguarding. All academies will follow Trust's policy on safeguarding.
Development of Trust wide policies	Directors	Changes to policies ratified by Trustees.
Development of Academy policies	Principal	All policies checked for compliance with Trust.
Appeals	Director of Governance	All appeals to be carried out by Academy Improvement Committee with support from Trust.
Catering Policies	Director of Facilities and Sustainability	Principals to ensure policies re implemented and followed.
Business Continuity	Director of Facilities and Sustainability	Implement business continuity policy if required.
Sustainability Plan	Director of Facilities and Sustainability	Lead development, implementation and monitoring of the Trust Sustainability and Climate Action Plan and provide annual assurance to Trustees.
Cyber Security	Director of ICT and DPO	Responsible for implementation of cyber security standards, incident response, cyber risk monitoring and reporting to Trustees through the Audit and Risk Committee. The Trust must maintain proportionate cyber security controls and provide regular assurance to Trustees on cyber risk, incident response and compliance with relevant DfE expectations.

Academy Improvement		
Delegated Duty	Delegated Authority	Comment
Development of Curriculum Policy	Principal	Principals are responsible for developing a curriculum policy with the support from Directors (Development Leads).
Approval of Curriculum Policy/Plan	CEO	Each Curriculum policy/plan should be submitted with the Academy Improvement Plan and SEF by the end of September.
To ensure and assure high standards of teaching for all pupils	Principal	Validated by AIC, Trust Central Team and Trustees.
Approval of Academy Improvement Plan	Trustees	All plans to be submitted with a fully costed staffing structure by the end of September
Approval of Self Evaluation	Trustees	All plans to be submitted by the end of September.
To ensure that pupils with additional needs are identified and appropriate provisions are in place	Principal	With support from Trust SEND Director. Trust oversight must include assurance that inclusive practice is embedded, pupils with SEND and additional needs are supported early and effectively, and academies collaborate with each other and external partners to strengthen provision.
To be accountable for pupils' outcomes	Principal	Monitored through the Director of Improvement role (Development Leads). Details reported by Directors of Improvement at each Standards committee (3 times per year).

Establishment of CPD/INSET days	Principal	Inform Trust Leadership Team.
Educational Visits	Principal	Must be submitted on Bromcom.
Monitoring and projecting pupil numbers	Principal	Must be submitted to the Trust on an annual basis each September. Where there is a 10% increase or decrease on pupil numbers for a 1 and 2 form entry school the Development Lead must be notified. Where there is a 5% increase or decrease on pupil numbers for a 3 form entry school the Development Lead must be notified.

Governance		
Delegated duty	Delegated authority	Comment
To appoint (and remove) Members of the Academy Improvement Committee	Board of Trustees	
To appoint and agree clerking agreements	Director of Governance	
To maintain Single Central Record in line with statutory regulation	Principal	Must be on the Trust template

To amend the academy day or holidays	CEO	Principals to prepare a business case and submit to Directors (Development Leads)
To ensure that the academy website is up to date with all statutory requirements	Principal	
To ensure that all Trust policies and procedures are followed and any breaches are reported to the Trust	Principal	Add to AIC meeting/Academy profile
Approval of Flexi Schooling requests	Director of Governance	All requests will be shared with Trustees
Request for deferred entry	Trust Leadership team	Review and response to parental request to deferred entry
Closure of academy (in exceptional circumstances)	CEO / COO	Principals to speak to either CEO or COO before closing an academy
Information Governance and Data Protection	Principal/ Director of Governance (DPO)	Operational responsibility rests with Principals. Trust-wide compliance, GDPR oversight, data breach monitoring and reporting are overseen by the Director of Governance acting as Data Protection Officer.

To approve the incorporation of new academies	Trustees	Due diligence framework implemented
Wrap Around Care requests	Director of Governance	All parental 'right to request' cases will be heard and responded to by the Director of Governance
Strategic Risk Management	CEO / COO	Trust risk register reviewed regularly and reported through Audit and Risk Committee to Trustees The Board must determine and approve the Trust's risk appetite and ensure that strategic risks are reviewed regularly through the Audit and Risk Committee and reported to Trustees.

Appendix 1

Trustee Reserved Powers

The following cannot be delegated:

- Approval of annual budget.
- Approval of annual accounts.
- Submission of audited accounts, the auditors' management letter and the annual summary internal scrutiny report to ESFA by the required deadline.
- Approval of strategic plan.
- Approval of Trust-wide policies.
- Approval of risk appetite.
- Approval of the governance structure, committee terms of reference and any material changes to board or committee composition.
- Approval of Scheme of Delegation.
- Appointment of CEO.
- Appointment of external auditors.
- Approval of academy transfers and significant structural change.
- Approval of major financial commitments beyond delegated limits.
- Approval and oversight of related party transactions, novel, contentious or repercussive transactions, special severance payments and any other transactions requiring prior DfE approval.
- Oversight of executive pay decisions, including any DfE approval requirements and assurance that executive pay does not rise faster than teachers' pay unless permitted by DfE requirements.
- Approval of conflicts of interest arrangements and oversight of the register of interests.