



Delegated Accountability Framework 2019

Strategy

Organisational Delegated Authority Framework

Strategy	Is authority delegated from the Board?	CEO	Company Secretary	Regional Directors	Chief Operating Officer	Academy Council	Principal
		Central	Central	Central	Central	Academy	Academy
Overall strategy of SET	No	Responsible for setting strategy, with the Board		Provides educational advice in developing the strategy	Provides financial & operational assistance in developing the strategy		
Admission of new academies to SET	No	Responsible for making recommendations to Board		Provides due diligence advice in relation to potential new academies	Provides due diligence advice in relation to potential new academies		
Admission of new sponsors to SET	No	Responsible for making recommendations to the Board					
Approval of academy development and improvement plans	Yes			Quality assures development planning across the MAT		Delegated authority for approval and monitoring of academy improvement plans, reporting exceptions to the Board	Responsible for development and delivery of academy improvement plans

Governance

Governance	Is authority delegated from the Board?	CEO	Company Secretary	Regional Directors	Chief Operating Officer	Academy Council	Principal
Appointment of Directors	No	Recommendations to Board					
Removal of Directors	No	Recommendations to Board					
Approval of terms of reference for subcommittees and for Academy Council	No	Recommendations to Board					
Recruitment procedures for Academy Councils	No	Recommendations to Board					
Appointment of Academy Councillors	No	Recommendations to Board		Recommendations to CEO		Recommendations to RD	Recommendations to AC
Appoint Chair of Academy Council	Yes	Approves appointment		Recommendations to CEO		Recommends to RD	
Removal of Academy Councillors	Yes	Responsible for removal		Recommendations to CEO		Recommendations to RD	
Appoint & Remove Clerk to the Trust Board	Yes	Recommendations to Board		Recommendations to CEO		Recommendations to RD	
Appoint & Remove Clerk to the Academy Council	Yes	Approves appointment		Recommendations to CEO		Recommends to RD	Recommendations to Academy Council
Ensuring at least 2 parent governors appointed to Academy Council	Yes	Approves Academy Council membership		Recommendations to CEO		Recommendations to RD	
Authorised to approve/amend organisational scheme of delegation	No	Recommendations to Board					

Governance	Is authority delegated from the Board?	CEO	Company Secretary	Regional Directors	Chief Operating Officer	Academy Council	Principal
Take out Director Indemnity Insurance Cover	Yes				Responsible for making adequate arrangements		
Acquisition of legal entities	No	Recommendations to Board			Provision of professional advice		
Maintenance of register of interests	Yes		Ensure Trustee register is maintained			Responsible for ensuring Academy register is maintained	Ensure academy register is maintained
Reporting of Related Party Transactions			Ensure Trustee Business & Pecuniary Interest (Related Party Transactions) register is maintained		Reporting all Business Pecuniary or Related Party Transactions over £20,000 to the ESFA	Monitor transactions with parties declared as a business & pecuniary or Related Party Transaction. Notify COO of transactions over £20,000	Ensure academy reports all business and pecuniary interests (RPT) to AC
Maintenance of Risk Register	Yes		Responsible for ensuring SET register is maintained			Responsible for ensuring the academy risk register is maintained	Maintain the academy risk register
Maintenance of a Gifts and Hospitality Register	Yes		Responsible for ensuring SET register is maintained			Responsible for ensuring Academy Gifts and Hospitality register is maintained	Maintain the academies Gifts and Hospitality Register
Entering into, or withdrawing from, a formal partnership	Yes but dependent on financial value and level of risk	Recommendations to Board			Provision of professional advice		
Develop policy and procedures	No, but some policies may be varied according to local operational need	Recommendations to Board	Provision of Professional Advice	Provision of Professional Advice	Provision of Professional Advice	Review and monitor implementation of central and local policy and recommends local changes to ELT	Responsible for delivery of central policy and recommends local policy to AC
Reporting on persons with significant control on GIAS and Companies House	Yes		Ensures Companies House information held is up to date and accurate. Ensure GIAS is up to date with SET information				

Education and curriculum

Education/Curriculum	Is authority delegated from the Board?	CEO				Academy Council	Principal
Approval and monitoring of SET and academy targets for student achievement and attendance	No	Responsible for proposing SET and local targets to the Board and providing appropriate reporting		Responsible for setting local targets		Review of local target setting and responsible for holding Principal to account	Reports to AC and Board via subcommittees
Approval and monitoring of SET and academy targets for quality of teaching and learning	No	Responsible for proposing SET and local targets to the Board and providing appropriate reporting				Review of local target setting and responsible for holding Principal to account	Reports to AC and Board via subcommittees
Approval and monitoring of SET and academy targets around student wellbeing	No	Responsible for proposing and SET local targets to the Board and providing appropriate reporting				Review of local target setting and responsible for holding Principal to account	Reports to AC and Board via subcommittees
New and updated educational policy	No	Makes recommendation to Board					
Approval of academy improvement plans	Yes	Responsible for linking Academy plans to SET Strategic plan and checking quality				Delegated authority for approval and monitoring of academy improvement plans	Provides plans to Academy Council for approval
Post-Ofsted Action Plan sign off for any academy that has RI or SW/SM category	No	Makes recommendation to Board					
Curriculum: Planning, implementation and review	Yes			Monitors effectiveness of curriculum plans		Monitors effectiveness of curriculum plans	Develops and delivers curriculum plans
Sign off of SET educational policies (e.g. off site visits, RE provision, Collective worship etc.)	No	Makes recommendations to Board		Makes recommendations to CEO			
Sign off of local academy educational policies and procedures (e.g. extracurricular activities, exams, behaviour, marking policies)	Yes	Approves policies and procedures		Makes recommendations to CEO		Recommends to CEO for approval. Then is responsible for the implementation and monitoring of local academy policies and procedures	Makes recommendations and reports to academy council
Term dates	Yes	Authorises term dates		Makes recommendations to CEO		Consulted	Makes recommendations to CEO
Length/ organisation of Academy day	Yes	Authorises organisation and Academy day		Makes recommendations to CEO		Consulted	Makes recommendations to CEO
Fixed term exclusions	Yes	Reports to the Standards Committee		Reports to the Standards Committee		Receives report monitors and tracks patterns	Follows LA procedures and reports to AC
Permanent exclusions	Yes	Reports to the Standards Committee		Reports to the Standards Committee		Delivers the management process	Follows LA procedures
Exclusion appeals	Yes	Reports to the Standards Committee		Reports to the Standards Committee		Delivers the management process	Follows LA procedures
Admissions policies and criteria	Yes	Can exercise authority to recommend change to the Board		Makes recommendations to CEO		Consulted	Follows LA procedures
Admission appeals	Yes	Can exercise authority to recommend change to the Board		Makes recommendations to CEO		Consulted	Authorised to attend admission appeals

Finance

* Delegated authority only applies where Academies have delegated responsibility. Where responsibilities have been withdrawn all delegated responsibility sits with the CEO and COO

Finance	ESFA	Is authority delegated from the Board?	CEO	Company Secretary	Regional Directors	Chief Operating Officer	Academy Council	Principal
						Central	Academy	Academy
STATUTORY REPORTING								
Completion and approval of annual accounts and reports to funding and regulatory bodies		No	Review			Recommendation to CEO and Board		
Completion and submission of other accounting returns		Yes				Authorised		
Completing annual & periodic financial reports to Board and/or DFE/ESFA (including income/expenditure, cash flow, projections etc.).		Yes				Authorised		
Authorised to complete PAYE returns		Yes				Authorised		
Authorised to complete VAT returns.		Yes				Authorised		
SYSTEMS OF INTERNAL FINANCIAL CONTROL								
Assurance over adequacy of systems of internal financial control		No	Provides assurance to EFA as AO			Provides assurance to CEO and Board		
Approval of financial regulations		No				Recommendation to Board		
Appointment of external auditors		No	Reports to Board			Advice from COO		
Appointment of internal auditors		No	Reports to Board			Management of appointment process		
BUDGET & MANAGEMENT REPORTING								
Pooling arrangements by the Multi-Academy Trust		No	Recommend approval to Board			Recommend approval to CEO		
GAG balances / carryforward		Yes	Approval of balances held over carryforward threshold			Recommend approval of balances held over carryforward threshold	Approve a carry-forward threshold: Secondary 5% of GAG - Primary/Special 8% of GAG	Approve a carry-forward threshold: Secondary 5% of GAG - Primary/Special 8% of GAG
ESFA Grant Claims		Yes where the value is less than £150,000	Approval of claims up to £150,000			Recommend approval of claims up to £150,000		
ESFA Returns		No	Recommend approval to Board			Recommend approval to Board		
Approval of annual budgets		No	Endorsement as Accounting Officer		Oversight of preparation, review of budget plans, recommendation to Board	Oversight of preparation, review of budget plans, recommendation to Board	Review of detailed academy financial plans and budget tracking	Preparation of detailed academy financial plans and budget tracking
Receipt and review of management accounts		No	Endorsement as Accounting Officer			Review of academy management accounts and preparation of summary report to Board	Monthly review of academy financial position	Accountable for local academy financial position
Approval of expenditure not provided for in the annual budget		Yes	Authority to approve up to £99,999			Authority to approve £20,000 - £39,999	Authority to approve up to £20,000	Powers delegated to Principal up to Academy Council threshold
Authority to make budget virements		Yes	Authority to approve up to £99,999			Authority to approve £20,000 - £39,999	Authority to approve up to £20,000	Powers delegated to Principal up to Academy Council threshold

Finance	ESFA	Is authority delegated from the Board?	CEO	Company Secretary	Regional Directors	Chief Operating Officer	Academy Council	Principal
PURCHASING AND PROCUREMENT								
Placing orders for goods and services, entering into contracts		Yes where value is less than £100k (OJEU limits to be observed)	Authorised up to £99,999 (formal tender process)			Authorised up to £39,999 (formal tender process)	Authorised up to £20K (minimum of 3 quotes)	Powers delegated to Principal up to Academy Council threshold
Authority to accept other than the lowest quote		Yes where value is less than £100k (OJEU limits to be observed)	Authorised up to £99,999 (formal tender process)			Authorised up to £39,999 (formal tender process)	Authorised up to £20K (minimum of 3 quotes)	Powers delegated to Principal up to Academy Council threshold
Ensuring compliance with tendering processes		Yes				Report to Board		
Authorised to create vendors on accounting system		Yes				Authorised		
Authorised to sign off vendor payments		Yes	Authorised			Authorised		
BANKING AUTHORITY AND CASH								
Approval to borrow money (bank or sponsor loan, overdraft)	Yes	No	Recommend approval to Board for submission to EFA			Recommend approval to CEO for submission to Board		
Cashflow Management, Treasury & Investment		Yes				Authorised to Review and approve. Investment details to be informed to Audit committee		
Open a bank account and approve signatories		No	Can be approved signatory			Can be approved signatory		
Applications for business charge card accounts		No	Can be approved signatory			Can be approved signatory		
TRANSACTION PROCESSING								
Payroll - Starters, leavers and amendments		Yes	Authorises changes			Oversees systems of internal control; authorises changes	Monitors staffing and performance	Authorises changes
Payroll - Administration		Yes	Final Authorisation of SET payroll			Final Authorisation of SET payroll		Authorises monthly payroll costs for the academy
Income		Yes				Authorised		
Authorisation of expense claims (cannot authorise ones own expenses)		Yes	Authorised		Authorised	Authorised	Authorised for Principal	Authorised
Control account reconciliation		Yes				Authorised		Limited authorisation of control accounts (Level 5 access)
Write-off bad debts	Transactions >1% of annual income or £45k individually; or 2.5% or 5% of annual income cummulatively	Yes - up to EFA limits	Authorised up to £5k			Authorised up to £5k	Authorised up to £2k	Powers delegated to Principal up to Academy Council threshold

Finance	ESFA	Is authority delegated from the Board?	CEO	Company Secretary	Regional Directors	Chief Operating Officer	Academy Council	Principal
FIXED ASSETS								
Management of capital projects		Yes					Ensures management and governance arrangements are appropriate and reports to Board (DoEHSC)	
Acquiring a freehold on land and buildings	ESFA approval required	No	Recommend approval to Board for submission to ESFA			Recommend approval to CEO for submission to Board	Recommend approval to CEO for submission to Board	
Disposal of a freehold on land and buildings	ESFA approval required	No	Recommend approval to Board for submission to ESFA			Recommend approval to CEO for submission to Board	Recommend approval to CEO for submission to Board	
Disposing of heritage assets	ESFA approval required	No	Recommend approval to Board for submission to ESFA			Recommend approval to Board for submission to ESFA	Recommend approval to CEO for submission to Board	
Disposal of assets - not land, buildings or heritage		Yes - but must approve over £5k				Authorised to Review and approve up to £5k	Authorised to Review and approve up to £1k	Powers delegated to Principal up to Academy Council threshold
Acquisition of assets		Yes where value is less than £100k (OJEU limits to be observed)	Authorised up to £99,999 (formal tender process)			Authorised up to £39,999 (formal tender process)	Authorised up to £20K (minimum of 3 quotes)	Powers delegated to Principal up to Academy Council threshold
Asset Register		Yes				Authorised to Review and approve	Monitor asset register	Maintain asset register
Security Of Assets		Yes				Oversight and must report to Board by exception	Monitor security of assets	Maintain security of assets
Loan of Assets		Yes				Authorised to Review and approve	Monitor loan of assets	Maintain loan of assets
INSURANCES								
Annual Risk Review & Premium Renewal		Yes				Authorised to Review and approve		
LEASING								
Taking up a finance lease	ESFA approval required	No	Recommend approval to Board for submission to ESFA			Recommend approval to CEO for submission to Board		
Taking up a leasehold on land and buildings	ESFA approval for lease >7 years	No	Recommend approval to Board for leases <7years			Recommend approval to Board for leases <7years		
Taking up any other lease		Yes but must have Board approval for over £40,000	Recommend approval to Board for leases agreements up to £40,000 (total contract period)			Recommend approval to Board for leases agreements up to £40,000 (total contract period)		
Granting a lease on land and buildings	ESFA approval required	No	Recommend approval to Board for submission to ESFA			Recommend approval to Board for submission to ESFA		
SPECIAL PAYMENTS								
Non-contractual /non-statutory compensation payments	ESFA Approval required over £50k	Yes	Approval up to £50k		Recommend approval	Recommend approval	Recommendation to COO/RD	Recommendation to Academy Council
Contractual / Statutory compensation payments		Yes	Approved		Recommend approval	Recommend approval	Recommendation to COO/RD	Recommendation to Academy Council
Compensation		Yes	Approval up to £50k		Recommend approval	Recommend approval	Recommendation to COO/RD	Recommendation to Academy Council
Ex gratia payments	ESFA Approval over £50k	Yes	Approval up to £50k		Recommend approval	Recommend approval	Recommendation to COO/RD	Recommendation to Academy Council

Human resources

Human resources	Is authority delegated from the Board ?	CEO	Company Secretary	Regional Directors	Chief Operating Officer	Academy Council	Principal
Staff Structure							
Approval of annual staffing plan	No	Reviews costed staffing plans and makes overall budget recommendation to Board		Reviews costed staffing plans and makes overall budget recommendation to CEO	Reviews costed staffing plans and makes overall budget recommendation to CEO	Reviews annual staffing plans	Prepares annual staffing plans
Authorised to Increase Academy/Organisational Headcount within existing staffing budget (Replacement of staff within approved budget only)	Yes	Can authorise (with COO) changes beyond overall budget			Can authorise changes within overall budget; reports changes in headcount to Finance Committee		Can authorise replacement posts within existing staffing budget & where roles are not determined as "Do not replace"
Job Description sign off	Yes				Quality Assures JD in terms of equal opportunities pan MAT	Approval of JD	Agrees JD and recommends to SET HR
Grade of posts (teaching & support staff)							
Job evaluation policy & procedures	No				Implements JE procedures		
Authorised to evaluate jobs and grades	Yes	Authorises job evaluation and recommends to the Board			Responsible for oversight and cross-organisational grading		Makes grading proposals to HR / with HR input
Authorised to agree/vary basic employment Terms & Conditions	No				Ensures consistent application of T&Cs		
Recruitment							
Recruitment and appointment of CEO	No						
Recruitment and appointment of COO	No	Appoints COO jointly with Board					
Recruitment and appointment of Executive Team Members and Principals	Yes- but may be involved	Appoints Executive Team and Principals		Involved in process	Involved in process	Involved in process	
Recruitment and appointment of other Senior Leaders	Yes - but may be involved	Authorised to appoint other Senior leaders		Leads process for own teams	Leads process for own teams	Involved in process at Academy	Leads process for own teams with SET representation on the panel
Recruitment and appointment of other staff	Yes	Authorised to appoint staff in line with identified strategy		Authorised to appoint staff within own teams as agreed with CEO	Authorised to appoint staff within own teams as agreed with CEO	Involved in process as appropriate	Authorised to appoint staff within own teams within approved headcount & where roles are determined as "Do not replace"
Recruitment processes	Yes	Carries out recruitment processes in line with SET procedures			Ensures legislative and best practice compliance in recruitment processes	Involved in recruitment process	Carries out recruitment processes in line with SET procedures
Signing of employment contracts	Yes (but Chair must sign CEO contract)	Signs contracts of COO, ELT and Principals			SET HR team sign other employment contracts		

Human resources	Is authority delegated from the Board ?	CEO	Company Secretary	Regional Directors	Chief Operating Officer	Academy Council	Principal
Pay Policy							
Annual approval of pay policy	No	Makes recommendation to Board			Contributes to recommendation to CEO		
Determination of pay ranges	Yes (except CEO)	Determines pay ranges for Principals and central staff			Responsible for oversight and cross-organisational grading	Agreed by Board of Directors 1st November 2017	Recommends to central HR
Appointment outside range in salary structure	Yes	Approves			Approves and reports to Audit committee	Review Due: 31st October 2018	Proposal for new range to AC
Allocation of TLR / SEN values	Yes				Responsible for MAT oversight	Approves allocations	Recommends to AC
Value of other discretionary allowances	Yes (except CEO)	Approval of discretionary allowances		Reviews proposal and makes recommendation to CEO	Reviews proposal and makes recommendation to CEO	Academy council proposes to RD/COO	Proposals for other allowances
Annual Pay Progression and Appeals Process	Yes to Nominations and Remunerations Committee	Makes recommendations to N and R Committee		Reviews proposal and makes recommendation to CEO	Reviews proposal and makes recommendation to CEO	Academy council proposes to RD/COO	Recommends to AC
Setting Executive Pay	No	Makes recommendation to Board			Contributes to recommendation to CEO		
Pension Policy & Discretions							
Handling of all pension matters (teachers and support staff)	Yes				Makes appropriate pension arrangements and ensures proper administration		Responsible to ensure Academy systems are in place
Approval of use of discretions	No	Makes recommendations to Board			Makes recommendation to CEO		
Operation of policies							
Approval of employment policies	No	Makes recommendations to Board					
Objective setting and performance appraisal	Yes (except CEO)	Senior ELT		RDs sets Principal's targets with AC and QA pan MAT targets RD sets Education Team targets		Principal appraisal with DoE/DDoE AC approves recommendations for pay progression to DoE	Conducts appraisal arrangements for own team and ensures pan Academy QA
Approval of formal restructure plans	Yes	Approves re-structure plan		Makes recommendations to CEO	Makes recommendations to CEO	Leads the process with the Principal; makes recommendations to COO	Creates formal restructure plan. Leads the process.
Authority to issue warnings or other disciplinary measures except dismissal*	Yes	May issue warnings across the SET and attend panels		May issue warnings in own teams and attend panels	May issue warnings in own teams and attend panels	Part of formal panel and monitors the level of action	May issue warnings and disciplinary measures
Suspension*	Yes (except CEO)	Yes (Principals and all other central staff)		Informs CEO	Informs CEO	Informed	May suspend following consultation with HR and DoE/DDoE
Dismissal*	Yes	CEO or other executive team member must be involved in dismissal panels		CEO or other executive team member must be involved in dismissal panels	CEO or other executive team member must be involved in dismissal panels	Part of formal panel	Part of formal panel
Appeals* (not pay progression)	Yes (except where CEO has heard original case)	CEO or other executive team member must be involved in appeal panels		CEO or other executive team member must be involved in appeal panels	CEO or other executive team member must be involved in appeal panels	May be part of formal panel if not involved in the first panel	

HR addendum

The trust reserves the right to delegate varying levels authority to academies according to the performance of the academy.

DISCIPLINARY CASES AND DISMISSALS delegation model					
DISCIPLINARY CAPABILITY (PROFESSIONAL COMPETENCE) ILL HEALTH CAPABILITY REDUNDANCY (The Board will have determined that there is a Redundancy situation) SOME OTHER SUBSTANTIAL SITUATION			GRIEVANCE		
Post	Delegated authority	Appeal	Post	Delegated authority	Appeal
Chief Executive	Board member	3 Board members	Chief Executive	Board Member	Chair of Board
Regional Directors and Chief Operating Officer	Board member or Chief Executive	3 Board members	Director of Education, Executive Principal	Chief Executive	Board member
Director of Operations and Director of Estates, Health and Safety and Compliance	Board member or Chief Executive	3 Board members	Deputy Director of Education	Director of Education	Chief Executive
Principals	Board Member or Chief Executive	Board Member	Director of Operations, Finance Director	Chief Executive	Board member
Subject Directors (Inc. Director of Teaching School and SCITT)	Chief Executive or RD or Chief Operating Officer	Board Member, Chief Executive or Executive Principal	Principal	RD	Chief Executive/Board member
Vice Principal and SLT Members	Principal, RD	Chief Executive	Directors of Subject	RD	RD (other)
All other Academy posts	Principal	RD	Vice Principal/SLT member	Principal	RD
Operations central posts	COO	Chief Executive or RD	All other academy posts	Principal	RD
Finance central posts	COO	Chief Executive or RD	All central finance posts	COO	Chief Executive
			All operational posts	COO	Chief Executive

STAFFING RESTRUCTURES
Delegated authority
CEO, Regional Directors, Chief Operating Officer, HR, Principal, Chair of Academy Council

SIGNATURE ON LETTER OF APPOINTMENTS	
Role	Delegated authority
Chief Executive	Chair of Board
RD	Chief Executive
Principal	Chief Executive, RD
Director of Education/ Deputy Director of Education	Chief Executive
Directors of Subjects	Chief Executive
Finance posts	COO
Operations posts	COO
Teachers Pay- Threshold/UPS	Principal
All other academy based posts	Principal, or RD if unavailable

PERFORMANCE MANAGEMENT	
Role	Delegated authority
Chief Executive	Chair and 1 Board member
RD	Chief Executive
Director of Primary	Chief Executive
COO	Chief Executive
Director of Operations & Director of EHS&C	COO
Principals	RD
Finance core team	COO
Operations core team	Director of Operations
All other academy posts	Principal and academy line management structure

Health & Safety

HEALTH AND SAFETY	Is authority delegated from the Board?	CEO	Company Secretary	Regional Directors	Chief Operating Officer	Academy Council	Principal
	Central	Central				Central	Academy
Health and Safety Policy	Yes, but monitors				Makes recommendation to Board	Responsible for implementation of local policy	Responsible for implementation of local policy
Ensuring the adequacy of health and safety practice throughout SET	Yes, but monitors				Oversees SET arrangements and reports to Board	Ensures Academy arrangements are adequate	Responsible for implementation of policy. Reports to Academy Council.
Critical incident planning	Yes, but monitors				Holds SET and Academy Critical incident plans and reviews as appropriate	Ensures critical incident plans are adequate and in place	Responsible for implementation of policy. Reports to Academy Council.
Health and Safety RIDDOR reporting	Yes, but monitors				Ensures RIDDOR reporting is in place	Ensures Academy arrangements are adequate	Responsible for implementation of policy. Reports to Academy Council.
Health and Safety Accident reporting	Yes, but monitors				Monitoring and reporting of exceptions	Ensures that accident reporting arrangements are in place and actions followed up	Responsible for the implementation of accident reporting arrangements
Statutory training	Yes, but monitors				Monitors SET statutory training for H&S and reports to Board	Monitors Academy statutory training for H&S	Responsible for ensuring that there are arrangements for statutory training for H&S
Statutory compliance testing	Yes, but monitors				Implements and monitors SET statutory compliance testing and reports to Board	Checks procedures are in place and monitors outcomes	Monitors local statutory compliance testing (ABM)
Academy health and safety arrangements including committee and use of risk assessments	Yes				Quality assures the local governance	Receives reports of H&S committee (or part of resources sub)	Ensures the H&S committee is in place (or part of resources sub) and reports to Academy Council
Fire risk assessment	Yes, but monitors				Ensures all academies have valid risk assessments in place	Supports Academy processes	Responsible for ensuring operational arrangements are in place and effective
Asbestos risk assessment	Yes, but monitors				Ensures all academies have valid risk assessments in place	Responsible for monitoring the impact of operational arrangements	Responsible for ensuring operational arrangements are in place and effective
General monitoring and action plans in relation to safety of sites including buildings conditions	Yes, but monitors				Reporting to Board	Responsible for monitoring the impact of operational arrangements	Responsible for ensuring operational arrangements are in place and effective

Safeguarding

Safeguarding	Is authority delegated from the Board?	CEO	Company Secretary	Regional Directors	Chief Operating Officer	Academy Council	Principal
	Central	Central				Central	Academy
Complete and maintain a single central register	Yes	CEO ensures single central register is in place for central team				Quality assures SCR	Ensures a compliant SCR is in place for the academy
Appoint a Board member as lead safeguarding trustee	No - Board ensures a trustee holds this responsibility						
Appoint a safeguarding academy councillor	Yes					Chair of academy council ensures safeguarding councillor is in post	
Ensure an annual safeguarding review is completed at each academy	Yes			Quality assures the review		Ensures review takes place and response to any necessary actions are swift	Ensures review is conducted
Ensure appropriate members of staff and academy councillors are trained in safer recruitment	Yes					Ensures at least one member of every recruitment panel has completed the training	Completes training and regularly updates their knowledge in this area
Ensure each academy has an appropriately trained designated safeguarding lead (DSL)	Yes					Ensures DSL is in post and has appropriate training and time to carry out duties	Ensures that a DSL is available to staff and pupils
Ensure a trust wide safeguarding policy is in place and compliant with statutory guidance	No	CEO quality assures the policy	Produces and reviews policy annually				
Ensure individual academy safeguarding policies are in place and compliant with statutory guidance	Yes					Ensures policy is compliant and reviewed annually	Ensures policy is enacted
Ensure academy staff receive regular and appropriate safeguarding training	Yes					Quality assures training	Ensures training takes place
Ensure SET central team receive regular and appropriate safeguarding training	Yes	CEO quality assures training	Lead safeguarding ELT member ensures central team have completed training				
Ensure that files related to the protection of children are well-organised and held securely	Yes					Quality assures arrangements for the storage of records	Ensures systems of high quality

Data

Data	Is authority delegated from the Board?	CEO	Company Secretary	Chief Operating Officer	Data Protection Officer	Academy Council	Principal
Data audit and Mapping	Yes				DPO Quality Assures and advises on best practice	Ensures measures and processes are in place	Designates school data lead and enables monitoring of data
Ensuring Data Security and Privacy controls are in place and monitored	Yes				DPO Quality Assures and advises on best practice	Ensures measures and processes are in place	Designates school data lead and enables monitoring of data
Information and cyber security controls including encryption	Yes				DPO Quality Assures and advises on best practice	Ensures measures and processes are in place	Designates school data lead and enables monitoring of data
Pupil, staff and visitor consent	Yes				DPO Quality Assures and advises on best practice	Ensures measures and processes are in place	Designates school data lead and enables monitoring of data
Data Processing Impact Assessments	Yes			Approval of DPIA's	Recommends DPIA's to COO	Ensures privacy by design is adhered to as key tenet of GDPR	Data lead develops DPIA for approval
Freedom of information requests	Yes				DPO will advise on request	Ensures measures and processes are in place	Ensures all FOIs are responded to within statutory time frames
Subject Access Requests	Yes				DPO will advise on request	Ensures measures and processes are in place	Ensures all SARs are responded to within statutory time frames
Data breach investigations	Yes				DPO will advise and report to ICO	Ensures measures and processes are in place	Enables data lead to investigate data breaches without obstruction
Reporting to ICO and board	Yes			Reports to ICO and Trustees	Makes recommendations to COO	Supports Data Lead on investigation where necessary	Data lead conducts initial investigation and reports findings to DPO
Document retention compliance	Yes				DPO Quality Assures and advises on best practice	Ensures measures and processes are in place	Designates school data lead and enables monitoring of data
Policy Management	Yes				DPO Quality Assures and advises on best practice	Ensures measures and processes are in place	Designates school data lead and enables monitoring of data
Data Controller Contract, Checks and Management	Yes				DPO Quality Assures and advises on best practice	Ensures measures and processes are in place	Designates school data lead and enables monitoring of data
Monitoring and evaluating the status and effectiveness of privacy controls	Yes				DPO Quality Assures and advises on best practice	Ensures measures and processes are in place	Designates school data lead and enables monitoring of data
Implement any recommendations made by the DPO within the timeframes set.	Yes					Ensures recommendations are follow through	Designates school data lead and enables monitoring of data
Ensure data is disposed of in a manner appropriate to the type of data, including digital data.	Yes				DPO Quality Assures and advises on best practice	Ensures measures and processes are in place	Designates school data lead and enables monitoring of data
Maintain an up-to-date and compliant archiving system which is labelled with the relevant retention periods.	Yes				DPO Quality Assures and advises on best practice	Ensures measures and processes are in place	Designates school data lead and enables monitoring of data
Ensure role-appropriate training is undertaken by all staff members.	Yes				DPO Quality Assures and advises on best practice	Ensures measures and processes are in place	Designates school data lead and enables monitoring of data
Ensure websites and academy council information is compliant	Yes				ELT Quality Assures and advises on best practice	Ensures measures and processes are in place	Designates school website lead and enables monitoring of website data accuracy