ALTERNATIVE LEARNING TRUST

SCHEME OF DELEGATION

Reviewed and approved by the Trust Board : 14 October 2026

LOVE, SOCIAL JUSTICE, COMMUNITY, FLOURISH

Contents

Introduction 2

Members' Role 2

Trustees' Role 2

Local Governors/Role of Local Governing Bodies and Trust Board sub-committees 3

Overarching Principles 5

Implementing Principles 5

Trust Board 6

Audit, Risk and Finance Committee 9

Governance and Growth Committee 12

Schools' Performance Committee 12

People Committee 13

Responsibilities Delegated to Local Governing Bodies (LGBs) 15

Detailed guidance on roles and responsibilities relating to:

Safeguarding 17

GDPR 18

Risk management 19

Estates 21

Appendix 1 Alternative Learning Trust Governance Diagram

Appendix 2 Local Governance Structure

Appendix 3 Financial Levels of Authority

Appendix 4 HR Levels of Authority

Introduction

This scheme of delegation lays out the powers and functions of the Members, Trust Board and Local Governing Bodies of the academies associated under the Memorandum of Association and Articles of Association of Alternative Learning Trust. It covers:

- Governance
- Strategy and planning
- Safeguarding
- Performance management
- Finance and investments
- Internal risk management and control
- Audit
- Fundraising
- Information systems
- Asset management
- Human resources
- Advisers
- Policies

Alternative Learning Trust Members

- Are the subscribers to the Memorandum of Association (where they are founding members).
- May amend the Articles of Association subject to any restrictions created by the funding agreement or charity law.
- May, in certain circumstances, appoint new Members or remove existing Members.
- Have powers to appoint and remove Trustees in certain circumstances.
- May, by special resolution, issue direction to the Trustees to take a specific action.
- Appoint the Trust's auditors and receive the audited annual accounts (subject to the Companies Act 2006).
- Have power to change the company's name and, ultimately, wind it up.

Alternative Learning Trust Board of Trustees (the Trust Board)

Trustees are responsible for the general control and management of the Trust and, in accordance with the provisions set out in the Articles of Association and its Funding Agreement, are legally accountable for all statutory functions and for the performance of all schools within the trust: they do this by carrying out the core governance functions. Trustees delegate some governance functions to Trust Board committees and Local Governing Bodies through this scheme of delegation.

In order to maintain robust financial oversight of the Trust, the Trust Board and committee structure will be reviewed annually.

Local Governors (Local Governing Body/LGB)

Local Governing Bodies are close to, and representative of, the communities their schools serve. They are:

- A valued point of consultation and representation in policy development.
- The recipients of detailed information about how their schools are being managed.
- Tasked with scrutinising management information thus providing assurance to Trustees that their school is:
    - operating within the ethos and values of the Trust and creating a positive climate for all stakeholders
    - working within agreed policies
    - meeting the agreed targets
    - strategic engagement with stakeholders
    - acting as an ambassador for the Trust

The Trust Board will ensure effective channels of communication between Trustees and Local Governing Bodies, as well as providing specific training and development programmes for all involved in the governance of Alternative Learning Trust.

Audit, Risk and Finance Committee (ARF Committee)

- The ARF Committee will provide assurance to the Board over the suitability of, and compliance with, financial systems, operational controls and ensure risks are adequately identified and managed.
- The ARF Committee will work with the auditor and decide on the auditor's suitability.
- The ARF Committee directs the Trust's programme of internal scrutiny and reports back to the Trust Board.
- The ARF Committee considers individual schools within the MAT, in addition to the Trust as a whole.
- The ARF Committee ensures delegated financial authorities are complied with.
- Staff are not permitted to sit on the Audit Committee.

Governance and Growth Committee

- Review and approval of governance arrangements.
- Appointment of Trustees, Chair and Vice Chair of Trustees, committee Chairs and individuals who sit on committees and Local Governing Bodies.
- Due diligence of growth process and estates/premises management.
- Presentation of recommendations to the Trust Board to inform and ensure the robustness of key decisions.

Schools' Performance Committee

- Monitoring of students' achievement and attainment.
- Oversight and analysis of examination results and progress with reference to year cohorts and to different groups (e.g. SEND, gender, ethnicity, Pupil Premium) over time.
- Monitoring of School Development Plans, curriculum and timetabling priorities.
- Making recommendations to the Trust Board regarding policy change.

People Committee

- Oversight of matters relating to the Trust's Human Resources (HR) functions, remuneration, executive pay and staff wellbeing.
- Strategic scrutiny of the Trust's performance management framework.
- Monitoring of complaints in line with the Complaints Policy.
- Review of the Trust's HR policies prior to ratification by the Trust Board.

OVERARCHING PRINCIPLES

1. The Board and Local Governing Bodies (LGBs) will work collaboratively and in partnership at all times, establishing effective two-way communication channels.
2. The Board will make decisions, following consultation with LGBs, on matters which affect all academies in the Trust: LGBs will make decisions which affect individual academies.
3. LGBs and Headteachers/Heads of Schools within the Trust should be as autonomous as possible and have as much freedom as possible.
4. LGBs and Headteachers/Heads of Schools will have maximum delegation of responsibility and decision making for the strategic direction and day-to-day operation of their academies, unless there is a cause for concern.

IMPLEMENTING PRINCIPLES

1. The Board will consult LGBs on proposals for the composition, membership, structure, and terms of reference for LGBs and sub-committees; on arrangements for the recruitment and appointment of governors; and on arrangements for the introduction of the Trust's multi-academy governance arrangements, before any decisions are made.
2. The Board will fully consult LGBs before putting in place any arrangements which directly affect LGBs and individual academies and before taking any decisions on policy or procedural matters.
3. LGBs will report termly, or as required, to the Board and will make available all relevant data and information on performance.
4. LGB Link Trustees will meet with Chairs of LGBs bi-annually to ensure effective two-way communication.
5. The length of service for Governors on LGBs is the same as the Articles of Association's requirement for Trustees' length of service. The LGBs' Code of Conduct will ensure there is good succession planning. All joining schools will be supported to undertake a review of their existing governance arrangements as part of the due diligence process. Each LGB Chair and Vice Chair is approved annually by the Trust Board.
6. The Board will put in place effective arrangements for monitoring and evaluating the performance of LGBs. The Board will take action, including the full or partial withdrawal of delegated authorities to LGBs, should they fail to carry out their duties and responsibilities effectively.
7. The Governors of good or outstanding schools/academies joining the Trust may possibly remain unchanged, except for where changes are required in order to comply with the Trust Board's Terms of Reference for LGBs.
8. The governance arrangements of schools requiring improvement when joining the Trust will be evaluated, supported and reorganised on an individual basis, taking into account the Ofsted improvement plan and the Trust's due diligence reports and assessments.

TRUST BOARD	CHAIR AND/OR VICE CHAIR	EXECUTIVE PRINCIPAL/CEO/ACCOUNTING OFFICER
Review and approval of governance arrangements, including: • Schedule of Trust Board meetings and format of agendas. • Approval of minutes. • Trust Committee structures and Terms of Reference, including those of the LGBs. • Final decision on interpretation of any aspects of the operation of the Trust Board or its Committees. • Levels of delegated authority, including limits of financial authority. • Policy on Trustee induction and appraisal and Trust Board review and development. • Trustee Code of Conduct and Conflict of Interest Policy. • Risk management (strategic).	Approval of Trust Board agendas and draft minutes for circulation to the Trust Board.	Oversight of development of LGBs. Contribute to the review of the Trust's governance arrangements.
Appointment of: • Chair of Trustees and Vice Chair of Trustees (annually). • Chair of Audit, Risk and Finance Committee (annually). • Appointment of the Clerk to the Trust Board. Approval of: • Board Committee Chairs, including Chairs and Vice Chairs of LGBs (annually). • Committee and LGB membership. • Co-opted Trustees under the terms of the Articles of Association. The Trust Board reserves the right to determine the composition of LGBs but will normally only exercise the right to appoint two Trustees as Chairs and Vice Chairs of the LGBs in the context of an Ofsted Requiring Improvement or in a category, or Trust assessment/monitoring report. Review of Trust Board skills' requirements and recruitment of new Trustees. **Internal control and risk management:** Annual review of full risk register. Identifying any issues or concerns which might reasonably be expected to expose the Trust to significant reputational, business, financial, legal or other risk. Approval of insurance providers and level of cover.		
Strategy and planning Planning for Trust growth and recommendations on expansion, including the outcomes of due diligence on prospective schools. Approval of the Trust's: • Vision, mission and values. • Strategic direction, including plans for growth.		**Strategy and planning** Supporting the Trust Board in developing/setting the Trust's overall strategy, including: • Early consultation with the Trust Board. • Drafting propositions for Committee/Trust Board review. • Development of strategic and operating plans and budgets for review by Committees/approval by the Trust Board.

TRUST BOARD	CHAIR AND/OR VICE CHAIR	EXECUTIVE PRINCIPAL/CEO/ACCOUNTING OFFICER
• Strategic and annual operating plans and budgets. Detailed scrutiny and challenge of the business aspects of the Trust's strategic and annual plans and budgets.		• Ensuring the school development plans align with the Trust's strategy; through the Executive Team. • Supporting the Trust's growth strategy through presenting recommendation and completing appropriate bid processes, etc.
Performance management Approval of the Trust's performance management and reporting framework including key performance indicators. Monitoring of performance in implementing the strategy and managing the Trust and decision making on action required. Approval of the Trust's Complaints Policy and decision making on appeals in line with the policy. Detailed scrutiny of the Trust's performance management and reporting framework and business performance against plans and budget and advice to the Trust Board. Monitoring of complaints and advice to the Trust Board in line with the Complaints Policy.		**Performance management** Support/advise Headteachers/Heads of Schools on the schools' performance management and reporting frameworks for approval by the LGBs. Ensure compliance with Trust policy and reporting. Implementing the Trust's Complaints Policy at school level. Supporting and facilitating the LGBs' responsibilities for overseeing: • Performance management and reporting framework. • Business performance against plans and budgets.
Human Resources Appointment of the Executive Principal/CEO and other Trust Senior Executives. Approval of the structure of the Trust's Executive Leadership Team. Review and approval of HR strategy and HR-related policies including the annual pay award and terms and conditions of employment, including flexible strategies to incentivise staff and reward good performance. Approval of any performance pay awards for the schools' SLTs and Executive Leadership Team (beyond the school) on the basis of proposals. Approval of a policy for the Executive Team's appraisal. Approval of performance pay awards (or otherwise) of the Executive Principal/CEO, following recommendations from the Performance Management Review Panel. Final appeals for all staff, SLT and above, as per sub group of Board (Appendix 4) under the Disciplinary and Grievance Policy. Monitoring of staff absence, turnover and welfare concerns. Review and monitor recruitment and retention of staff. Approval/recommendation of training days, activities and programmes which promote safeguarding, safety and welfare. Oversight and approval of staff training days.	**Human Resources** Lead the process of recruiting the Executive Principal/CEO and making recommendations to the Trust Board with regard to an appointment. Appoint two Trustees to undertake the Executive Principal/CEO's appraisal. The panel will annually set and review the Executive Principal/CEO's objectives and report to the Trust Board on the process and outcomes.	**Human Resources** Lead the recruitment of the schools' SLTs in consultation with nominated Trustees. Lead the recruitment of the Trust's Executive Team in consultation with nominated Trustees and make recommendations with regard to appointments for Trust Board approval. Development of the Executive Leadership Team structure. Attend monthly one-to-one meetings with the Chair of Trustees. Develop HR strategy and policies for Trust Board review and approval. Set the performance management for individual schools' Headteachers/Heads of Schools, managing their performance and making recommendations regarding their levels of remuneration. Set the objectives of the Executive Team, managing their performance and making recommendations regarding their level of remuneration. Review and coordinate training days across the Trust, where appropriate.

TRUST BOARD	CHAIR AND/OR VICE CHAIR	EXECUTIVE PRINCIPAL/CEO/ACCOUNTING OFFICER
Monitoring of Complaints Policy/procedures. Agree panel for grievance/disciplinary procedures.		
Educational performance Approval of the Trust's: • Communications and systems for ensuring effective stakeholder engagement. • Quality Assurance framework. Ratification of term and INSET dates from each LGB. Monitor policy implementation and decision making on action required. Monitor and review safeguarding procedures. Scrutinise outcomes for pupils, to ensure these are ambitious and deliverable. Monitor and review LGBs' reports on development and quality of teaching, learning and assessment. School culture (to include leadership, personal development and staff and student wellbeing). Review achievement (following each national assessment point and internal tests/examinations) within Trust assessment and reporting framework. Evaluate, monitor and approve commissioning/Service Level Agreements. Review outcomes and achievements and development plans linked to Trust's development plan.		**Educational performance** Advising on, and supporting, the development and implementation of the Trust's: • Educational performance. • Communication processes, including systems for ensuring effective stakeholder engagement. Ensuring the effective management of the schools and other initiatives in line with policy (including ensuring provision of information, advice and support on national education policy to the LGBs). Advising on, and supporting, the development and implementation of a Quality Assurance framework for Trust Board approval.
Policies Approval of Trust level policies in accordance with DfE requirements. Delegation of statutory and non-statutory policies to be held at school level and approved by LGBs.		
Annual Report and Accounts Approval of audited annual Report and Accounts.		

AUDIT, RISK AND FINANCE COMMITTEE (see Appendix 3 for Financial Levels of Authority)		
TRUST BOARD	**AUDIT, RISK AND FINANCE COMMITTEE**	**EXECUTIVE PRINCIPALCEO/ACCOUNTING OFFICER**
Academy Trust Handbook Approval of procedures for the Trust's Audit, Risk and Finance Committee to inform the Trust Board where the DfE requires prior approval (beyond the delegated limits as per the Academy Trust Handbook). If applicable, approval of an appeals mechanism should the Trust pool GAG funding.	**Academy Trust Handbook** Inform the Trust Board where the DfE requires prior approval for: • Severance, compensation and ex gratia payments. • Write-offs, guarantees, letters of comfort, and indemnities. • Acquisition and disposal of fixed assets. • Finance leases or leaseholds/tenancy agreements on lead or buildings. • Novel, contentious and repercussive transactions. • Borrowing.	
Finance and investments Approval of Financial Regulations. Approval of: • Opening/closing of bank accounts and cheque signatories. • All loan agreements (including overdraft facilities, mortgages or other collateral or security). • Budget expenditure in line with levels of delegation set out in Appendix 3. • Covenants on prospective restricted donations (to be reviewed in revised Financial Standing Orders). • Monitoring and review of financial performance of the Trust and decision making on action required.	**Finance, investments, risk management** • Detailed scrutiny and advice to the Trust Board with regard to Financial Regulations and all financial decisions reserved for the Trust Board. • Detailed scrutiny and advice to the Trust Board with regard to the Trust's systems of internal control and risk management. • Termly scrutiny of the Risk Register for the Trust and constituent schools. • Review of the Trust's Reserves Policy and advice to the Trust Board that the Trust expects each school and central team to hold a reserve of one month's salary. To be reviewed by the Board as required. • Detailed scrutiny and advice to the Trust Board re investment strategy and policy. • Approval of investment providers and products. • Detailed scrutiny of investment performance and advice to the Trust Board. • Approval of format and management accounts. • Adjudication on any GAG pooling appeals.	**Finance, investments, risk management** Oversight and scrutiny of school budgets. Development of the Trust's Financial Regulations for review/approval. Development of the Risk Register for the Trust and constituent schools. Management of the Trust's finances in accordance with the Funding Agreement/Academy Trust Handbook. Monitoring of the Reserves Policy and raising any issues through monthly reporting.

AUDIT, RISK AND FINANCE COMMITTEE (see Appendix 3 for Financial Levels of Authority)		
	• Reporting to the DfE any instances of fraud or theft above £5,000 against the Trust (either by employees, Trustees or third parties, or where fraud is unusual or systematic in nature).	
Audit and internal scrutiny Review of external auditors' management letter and decisions with regard to action on issues arising.	**Audit and internal scrutiny** Recommendation to the Members with regard to the appointment of external auditor; setting the scale of fees annually and approval of the scope of work. Consideration of management letter and advice to the Trust Board with regard to actions arising and adoption of the Annual Report and Accounts. Directs the Trust's programme of internal scrutiny and reports back to the Trust Board.	**Audit and internal scrutiny** Supporting and cooperating with the work of external auditors and internal scrutiny providers as determined by the Audit, Risk and Finance Committee/Trust Board. In collaboration with the Chief Financial Officer, preparation of Annual Report and Accounts. Responding to, and acting on, issues raised in the auditors' management letter and internal scrutiny reports.
Fundraising and partnerships Approval of the Trust's fundraising strategy and policy.	**Fundraising and partnerships** Detailed scrutiny of fundraising strategy, policy and performance and advice to the Trust Board.	**Fundraising and partnerships** Advising on, and identifying, requirements for fundraising initiatives in line with strategy and policy. Development of fundraising strategy and policy for Trust Board approval and ensuring its effective implementation.
Information systems Approval of information systems, strategy and policy.	**Information systems** Detailed scrutiny of the Trust's information systems strategy, policy and performance, and advice to the Trust Board.	**Information systems** Supporting the implementation and operation of the schools' information systems. Development of an information systems strategy and policy for approval, and ensuring its effective implementation and reporting to the LGBs/Audit, Risk and Finance Committee, as appropriate.
Asset management Approval of the sale, purchase or disposal of any capital asset > £50k value in line with provisions of the Funding Agreement.	**Asset management** Detailed scrutiny of the Trust's asset management strategy and performance and advice to the Trust Board.	**Asset management** Purchase <£50k. Sale or disposal of capital fixed assets < £10k.

AUDIT, RISK AND FINANCE COMMITTEE (see Appendix 3 for Financial Levels of Authority)		
	Responsibility for ensuring compliance with health and safety legislation and guidance. **Estates** Monitor and regularly review all aspects of estates management and development, capital programmes and projects, maintenance and repairs.	Recommendations with regard to purchase of land/property (DfE ATH 5.23-5.24) or sale of fixed assets < £10k, in line with the provisions of the Funding Agreement. Development of a strategy for the management of fixed assets and its implementation.
Advisers Appointment of the Trust's main legal advisers, investment advisers, and approving the terms of their appointment.	**Advisers** Approval of the Trust's bankers. Review recommendations with regard to the Trust's main legal advisers, investment advisers and the terms of their appointment.	**Advisers** Manages the process of review and makes recommendations with regard to selection/ appointment and on-going liaison.
Policies	**Policies** Review of the following policies prior to Trust Board approval: • Charging and Remissions Policy • Conflict of Interest Policy • Fraud Policy • Fraud Risk Assessment • Fundraising Policy • Gifts and Hospitality Policy • Investment Policy • Reserves Policy • Risk Management Policy • Trustees' and Governors' Expenses Policy	

GOVERNANCE AND GROWTH COMMITTEE

Growth strategy

Monitoring and reporting to the Trust Board on growth strategy and process.
Review of applications from schools who have expressed an interest in joining the Trust (pre-due diligence).

Governance

Trustee recruitment and succession planning.
Evaluation of Member and Trustee applications for recommendation to existing Members for approval.
Oversight of Trust governance induction and training (for all Members, Trustees and Local Governors).
Set up the annual governance meeting schedule for Trust Board approval (Board, AGM, Board Sub-Committees and LGBs) to ensure an effective flow of information.
Review and approve Local Governing Body Terms of Reference, annually.
Review and approve Code of Conduct for Trustees and Local Governors which must be signed by all, annually.
Approval of all new appointments to Local Governing Bodies.
Set up annual governance reviews and skills audits to be agreed in liaison with the Chair of Trustees and LGB Chairs. Outcomes to be reported to the Trust Board.

Due diligence

Review and approval of due diligence arrangements for academies wishing to join the Trust.
Review of governance arrangements for schools wishing to join the Trust and recommend approval, or otherwise, to the Trust Board.
Ensure that existing Governors of schools wishing to join the Trust are fully briefed on the changes to their roles once they join the Trust, and are fully prepared for conversion/transfer.

Estates and premises

During any due diligence process, the Governance and Growth Committee will assess any shared building arrangements and/or the condition of buildings and grounds, reporting to the Trust Board on areas where capital investment may be required.

Risk management

Evaluation of areas of risk associated with the Governance and Growth Committee's remit and report to the Trust Board through the risk reporting framework.

SCHOOLS' PERFORMANCE COMMITTEE

a) To provide independent challenge to the schools' leadership, primarily in respect of pupil performance, the quality of the school experience and execution of school improvement plans.

b) To provide formal feedback to the Trust Board on standards of leadership and delivery of the outcomes targeted by the Trust in its strategic plan and the schools in their improvement plans, highlighting strengths, weaknesses, opportunities for improvement and risks observed at working level in the schools.

c) To lead on a process of review of performance information and reports, observation and dialogue with the schools' leadership in which they question, challenge and support the leadership to the point where they are able to provide an informed view to the Trust Board of their view of performance of their school and its leadership.

d) To ensure that each academy is supported and scrutinised in their educational performance.

e) To ensure that lines of accountability are clear and that individual schools are held to account for their performance.

SCHOOLS' PERFORMANCE COMMITTEE

f) To monitor and challenge how well all pupils are doing in addition to providing strategic oversight of significant and vulnerable groups, including: pupil progress and attainment, pupil behaviour and behaviour management, destinations, Ofsted, attendance, safeguarding, curriculum reviews, reports of external validation, suspensions and exclusions, discriminatory incidents, SEND/EHCPs, Single Central Record, schools' websites, parental and community engagement.

g) To support schools to reduce the number of children who are not in education, employment or training (NEET) at age 16 and beyond.

PEOPLE COMMITTEE

To provide oversight of matters relating to the Trust's HR, remuneration and staff wellbeing and to make recommendations to the Trust board to inform and ensure the robustness of key decisions.

Staffing

Review of the Trust's staffing structure.
Review of pay decision data.
Ensure that staffing and recruitment procedures comply with equality legislation and safer recruitment practice.
Monitor provision of staff training and CPD.

Performance management

Scrutiny of the Trust's performance management, reporting framework and business performance.
Oversight of the operation of the Appraisal Policy; to include making arrangements for the senior executive leader's performance management.
Monitoring of complaints and advice to the Trust Board in line with the Complaints Policy.

Remuneration

Consider and recommend to the Trust Board the Trust's policy for executive remuneration.
Review and design all remuneration frameworks for the Trust, including any performance-related pay aspects.

Staff wellbeing

Review and monitoring of staff work-life balance, working conditions and wellbeing. Monitoring of staff absence rates.
Oversight of professional development opportunities with a particular focus on cross-Trust opportunities and make recommendations.
Review analysis of annual staff wellbeing surveys and make recommendations, as appropriate.
Review and make recommendations relating to Diversity, Equality and Inclusion initiatives, including the audit of equality objectives set by each school.

HR

Appraise the efficacy of us of the Trust's HR systems and procedures and, where appropriate, recommend areas for future development.
Monitor staff turnover, absence patterns and punctuality data.
Receive updates on staff disciplinary and grievance matters.

PEOPLE COMMITTEE
Advisers: Review recommendations with regard to the Trust's main HR advisers and the terms of their appointment. **Policies:** Review of the Trust's HR policies prior to Trust Board approval (to include the Trust's Pay Policy).

LOCAL GOVERNING BODIES

The purpose of governance for Local Governing Bodies (LGBs) within Alternative Learning Trust is to:

Provide strategic leadership by

- Ensuring clarity of vision, values and objectives for the school.
- Agreeing the school improvement strategy with priorities and targets.
- Meeting statutory duties.

Ensure accountability and assurance by

- Monitoring the educational performance of the school and progress towards agreed targets.
- Strategic engagement with stakeholders.
- Contribution to school self-evaluation.

Oversee financial performance by

- Monitoring and scrutiny of the school's budget.
- Ensuring money is well spent and value for money is obtained.
- Ensuring risks to the organisation are identified and reported to the Trust Board.

RESPONSIBILITIES DELEGATED TO LOCAL GOVERNING BODIES (LGBs)

Each LGB will review and report on their individual school's performance and hold the Headteacher/Head of School to account for their school's performance.

Business	Outcomes for learners, and teaching and learning	Personal development, behaviour and attitudes and wellbeing
Review of LGB skills requirements and recruitment of new Governors, with recommendations to the Trust Board. Review and reporting of Governor induction and training. Making appropriate arrangements for the election of parents and staff to the LGB. Making appropriate arrangement for designated Governors, especially for HR, Finance, Safeguarding, CLA/LAC and SEN. Detailed scrutiny of performance against school development plans, post-inspection action plans, and/or school improvement plans in support of Trust strategy, decision making with regard to action required and advice to the Trust Board. Oversight and scrutiny of school budget and expenditure including new staffing posts.	Promoting high standards of educational achievement in line with the overall strategic direction of the Trust. Monitoring the school development plan and Ofsted priorities. Ensuring that the curriculum for the schools is appropriate, balanced, broadly based and operates within the context of the school's statement of values and ethos as agreed by the Trust. Detailed scrutiny of educational management information in support of pupil and school performance and providing advice and information to the Trust Board.	Ensuring that both local and Trust safeguarding procedures are adhered to, including the review and approval of the annual safeguarding audit. Oversight of multi-agency, family and therapeutic work. Scrutiny of data to enable early identification in relation to: - Special Educational Needs (SEN) - Pupil Premium Grant (PPG) - Attendance - Exclusions - Physical intervention and review of interventions to ensure effective targeting and improvements in outcomes.

RESPONSIBILITIES DELEGATED TO LOCAL GOVERNING BODIES (LGBs) **Each LGB will review and report on their individual school's performance and hold the Headteacher/Head of School to account for their school's performance.**		
Oversight and reporting on benchmarking and best value. Annual approval of Pupil Premium/Primary PE and Sports Premium statements and publication on school's website by 31 December deadline each year. Review of health and safety reports and decision on action required. Review and approval of delegated school-level policies (statutory and non-statutory) within agreed review cycles. Approval of term and INSET dates. Ensuring that performance management summary reports are presented, with relevant recommendations on staff pay progression, to the first meeting of each autumn term. Pay progression recommendations to be put forward by LGBs to the Trust Board for approval before the 31 October deadline. Staff Governors will be required to withdraw from meetings where performance management/pay progression is discussed and voted on. Oversight and scrutiny of procedures and processes relating to people management, including staff training. Making appropriate arrangement for implementing disciplinary and grievance procedures in line with school policies (see HR levels of authority Appendix 4). Escalating to the Trust Board via meetings or email any issues or concerns which might reasonably be expected to expose the trust to significant reputational, business, financial, legal or other risk. Detailed scrutiny of school sale, purchase or disposal of capital and/or fixed assets and advice to Trust Board. Reporting on school admissions.		Statutory monitoring of bullying, racist and homophobic incidents and child-on-child abuse: sexual harassment, sexual violence, harmful sexual behaviour. Monitoring of statutory training in safeguarding, restraint and Prevent. Oversight of complaints about the school in line with the Complaints Policy.

Safeguarding roles and responsibilities

Trustees (Trust Board)	Executive Principal/CEO/Accounting Officer	Local Governing Bodies (LGBs)	Headteachers
• Set the strategic vision, championing a safe school culture including safeguarding and promoting the welfare of children. • Ensure we are promoting a learning culture and no-blame approach to learning from any incidents and Local Authority learning reviews after serious incidents. • Accountable for setting overall policies for safeguarding and child protection to ensure appropriate action is taken in a timely manner to safeguard and promote children's welfare. • Appoint a named safeguarding Trustee. • Monitor data in relation to safeguarding policy application, incidents and their resolution. • Approve all safeguarding policies including Safeguarding and Child Protection, Prevent, Looked After Children and Safer Recruitment. • Receive regular reports regarding safeguarding provision across Alternative Learning Trust. Including when LADO referrals have been made, which will be minuted.	• Provide safeguarding and child protection guidance for all schools, in line with statutory guidance and non-statutory national guidance. • Take an active role in Local Authority safeguarding partnerships in each local area. • Quality assure by sampling and auditing safeguarding visits and practice to monitor compliance with policies and effectiveness of practice. • Responsible for monitoring that each LGB is effectively scrutinising statutory compliance with regard to safeguarding and child protection for all schools on behalf of the Trust Board. • Ensure all Trustees have the appropriate child protection checks, and these and are recorded. • Report to Trust Board meetings when LADO referrals have been made.	• Appoint a Governor on each LGB to have specific responsibility for welfare and child protection in the school, reporting to the full LGB as appropriate. • Check the Single Central Record (SCR) is recording all new starters (including volunteers). • Monitor data in relation to safeguarding incidents and their resolution within the school. • Record in minutes where LADO referrals have been made. • Responsible for knowing and understanding the school's evaluation of providing a safe school culture for all children.	• Responsible for safeguarding and child protection within the school. • Overall leadership responsibility for safeguarding and oversight of the work of the Designated Safeguarding Leads (DSLs) in the school. • Responsible for identifying risks to effective safeguarding and taking action to reduce potential risks. • Responsible for ensuring that school policies and practices take into account the procedures and practice of the local authority and Alternative Learning Trust. • Responsible for informing the CEO by email, using the subject heading LADO (and copying in the Deputy CEO and Head of Governance) as soon as any LADO referrals are made. • Responsible for reporting to LGB meetings when LADO referrals have been made. • Responsible for providing reports on welfare and child protection to the LGB and to the Executive Principal/CEO and Executive as appropriate.

GDPR roles and responsibilities

Trustees (Trust Board)	Executive Principal/CEO/ Accounting Officer (& Data Protection Officer for ALT)	Local Governing Bodies (LGBs)	Headteachers
• Set the strategic vision, championing a GDPR school culture including managing information and only holding the right information for the right amount of time. • Accountable for setting overall policies for information and GDPR to ensure appropriate action is taken in a timely manner to hold and delete information and secure information and promote GDPR across the Trust and its schools. • Appoint a named Data Protection Officer. • Monitor data in relation to GDPR policy application, incidents and their outcomes. • Approve a Trust level GDPR policy and monitor its application across the Trust. • Receive regular reports regarding GDPR. Monitor data.	• Provide GDPR guidance for all schools, in line with statutory guidance and non-statutory national guidance. Including good practice and learning from any breaches. • Quality-assure by sampling and auditing information management and practice to monitor compliance with policies and effectiveness of practice. • Report to Information Commissioner's Office and internal reporting. • Responsible for maintaining the Trust's Data Protection Incident Log. • Responsible for monitoring that each LGB is effectively scrutinising statutory compliance with regard to GDPR for all schools on behalf of the Trust Board. • Ensure that all schools adhere to DfE guidance. • Ensure all Trustees have up to date and appropriate GDPR training and awareness.	• Ensure that each LGB Governors are aware that they have a responsibility for ensuring there is strong awareness of GDPR in all school areas. • Ensure policies are in place and followed. • Monitor data in relation to GDPR breaches and learning from them, leading to a change in practice and process. • Responsible for knowing and understanding the school's auditing of information-holding and the process for gathering and deleting it.	• Responsible for GDPR and managing the GDPR Officer within the school. • Responsible for ensuring all staff are trained and up to date with GDPR training and compliance. • Responsible for identifying risks to data breaches and taking action to reduce potential risks. • Responsible for ensuring that data breaches are reported to the DPO for inclusion in the Trust's Data Protection Incident Log. • Responsible for ensuring that school policies and practices take into account the procedures and practice of the Information Commissioner and Alternative Learning Trust. • Responsible for providing reports on data management and GDPR compliance.

Risk management roles and responsibilities

Trustees (Trust Board and Audit, Risk and Finance Committee)	Executive Principal/CEO and Executive Team	Local Governing Bodies (LGBs)	Headteachers
Trust Board • Adoption of the Trust's Risk Management Policy with responsibility for approval and subsequent cycle of review. • Ensures the Trust has a robust risk management framework and risk register process in place, taking into account: ▪ The Trust's Risk Appetite (the amount and type of risk that the Trust is willing to take in order to meet its strategic objectives). ▪ The Trust's Risk Tolerance (the acceptable level of risk that the Trust can actually cope with). • Undertakes an annual review of the full Trust and schools' management of risks, with the risk registers being one of the key documents. • Includes formal reporting on principal risks in the annual Trustees' Report (which forms part of the Trust's annual audited Report and Accounts). • Ensures Risk Protection Arrangements (RPAs) or other insurance arrangements are in place and approved annually by the Trust Board. **Audit, Risk and Finance Committee** • Leads on strategic oversight and detailed scrutiny of risk management and its effectiveness, and undertakes termly scrutiny of the Trust's risk register: evidence of robust challenge and responses are recorded in the minutes. • Reviews the Trust's Risk Management Policy prior to full Trust Board approval.	• Maintains ownership of the Trust's risk register which provides a framework for managing risk using the Share, Avoid, Reduce, Accept approach. • Adheres to the Trust's overarching risk strategy framework which involves: ▪ Risk identification ▪ Risk estimation (assessing the likelihood and impact) ▪ Risk prioritisation ▪ Risk mitigation ▪ Risk monitoring ▪ Risk reporting • Regular risk register reviews held at Executive Team meetings, where evidence of decision-making is recorded within the risk register software. • Ensures a focus on risk management and risk registers is included in governance induction for all tiers of governance and for new Heads and senior leaders across the Trust. • Provides support in setting up software and, where needed, assistance with risk management concepts/terminology. • Ensures the audit trail for risk register updates and decision-making is available on Every.com for internal and external auditors, upon request. • Risk management is reported on monthly to Trustees via the 'Trust Update'. • Ensures a strong audit response. • Ensures robust evidence from the internal scrutiny process. • Ensures the central Trust has a strong business continuity process/plan in place to deliver central services.	• Ensure standing agenda items for each LGB meeting include scrutiny of their school's risk register. • Engages in robust challenge and oversight of their school's risk register and risk management processes. • Evidence of robust challenge on risk register (including RAG-ratings) is undertaken at LGB meetings, with challenge and responses being recorded in the minutes. • Governors include risk management and awareness of risk during Governor visits and show evidence that this has been done within Governor visit reports which are presented to the LGB.	• Maintains ownership of the school's risk register which provides a framework for managing risk using the Share, Avoid, Reduce, Accept approach. • Adheres to the Trust's overarching risk strategy framework which involves: ▪ Risk identification ▪ Risk estimation (assessing the likelihood and impact) ▪ Risk prioritisation ▪ Risk mitigation ▪ Risk monitoring ▪ Risk reporting • Includes estates/buildings and critical incident/business continuity plans as standing items on risk registers. • Ensures the audit trail for risk register updates and decision-making is available on Every.com for internal and external auditors, upon request. • Ensures staff are fully informed that the risk register is a live document to demonstrate (and provide evidence on) how the school is managing risk. • Prepares up-to-date risk registers for circulation with LGB papers.

Share – outsource the activity or transfer the risk through insurance
Avoid – change the plan or the activity so that the problem is not encountered
Reduce – make changes that mitigate or control the risk
Accept – note the risk and take the chance that it, or part of it, might arise

Included in Alternative Learning Trust's Risk Management Policy is reference to the DfE's s good practice guide to risk management which suggests that trusts may find it helpful to consider risk management in terms of the ICAEW (Institute of Chartered Accountants in England and Wales) four lines of defence concept ICAEW four lines of defence:

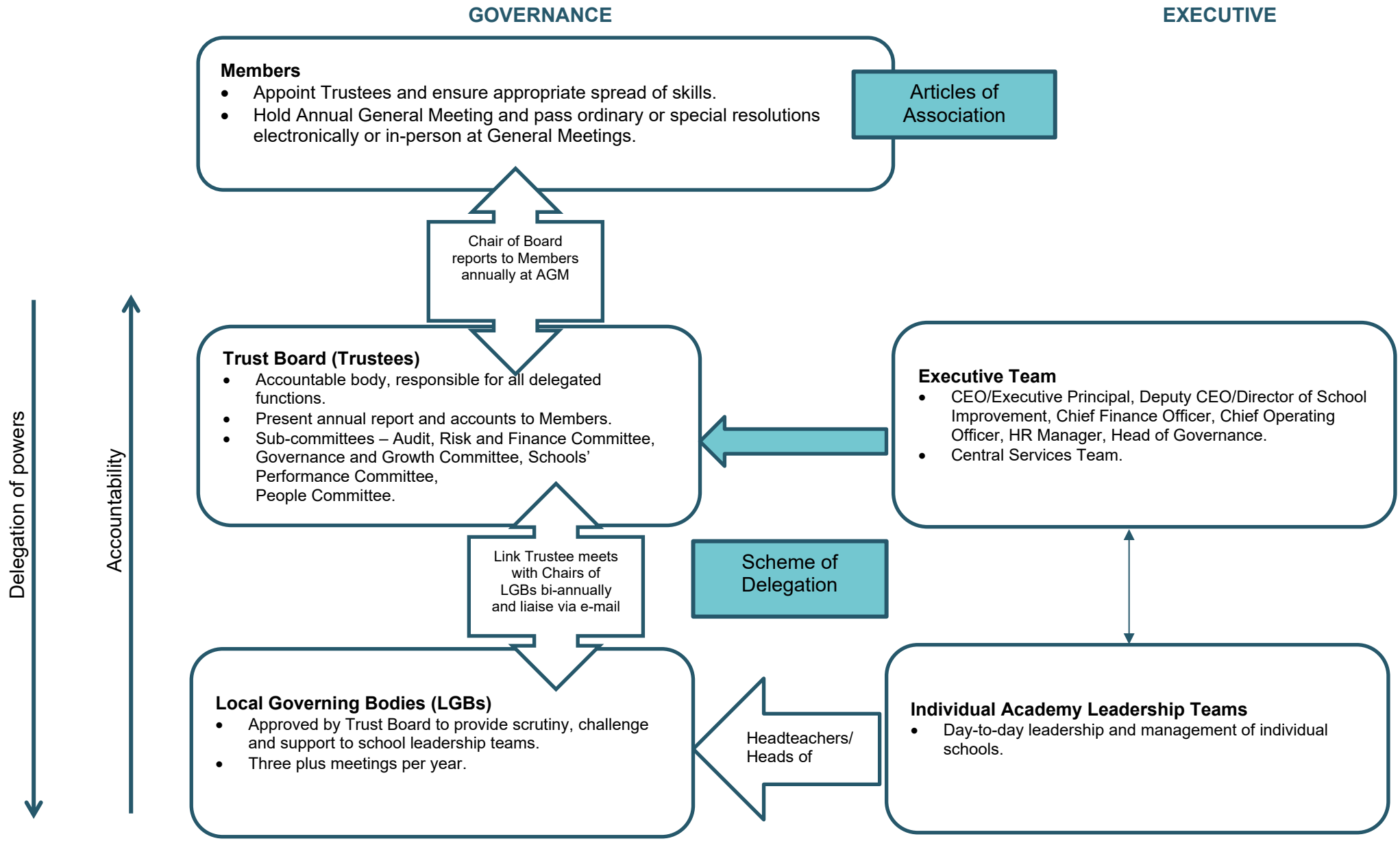
- 1st line of defence – management and staff who own and manage risk on a day-to-day basis.
- 2nd line of defence – the Board which oversees the effectiveness of the risk management framework.
- 3rd line of defence - the internal scrutiny function which provides independent assurance on the overall effectiveness of risk management and controls.
- 4th line of defence - assurance from external independent bodies such as the external auditors and other external bodies.

Estate roles and responsibilities

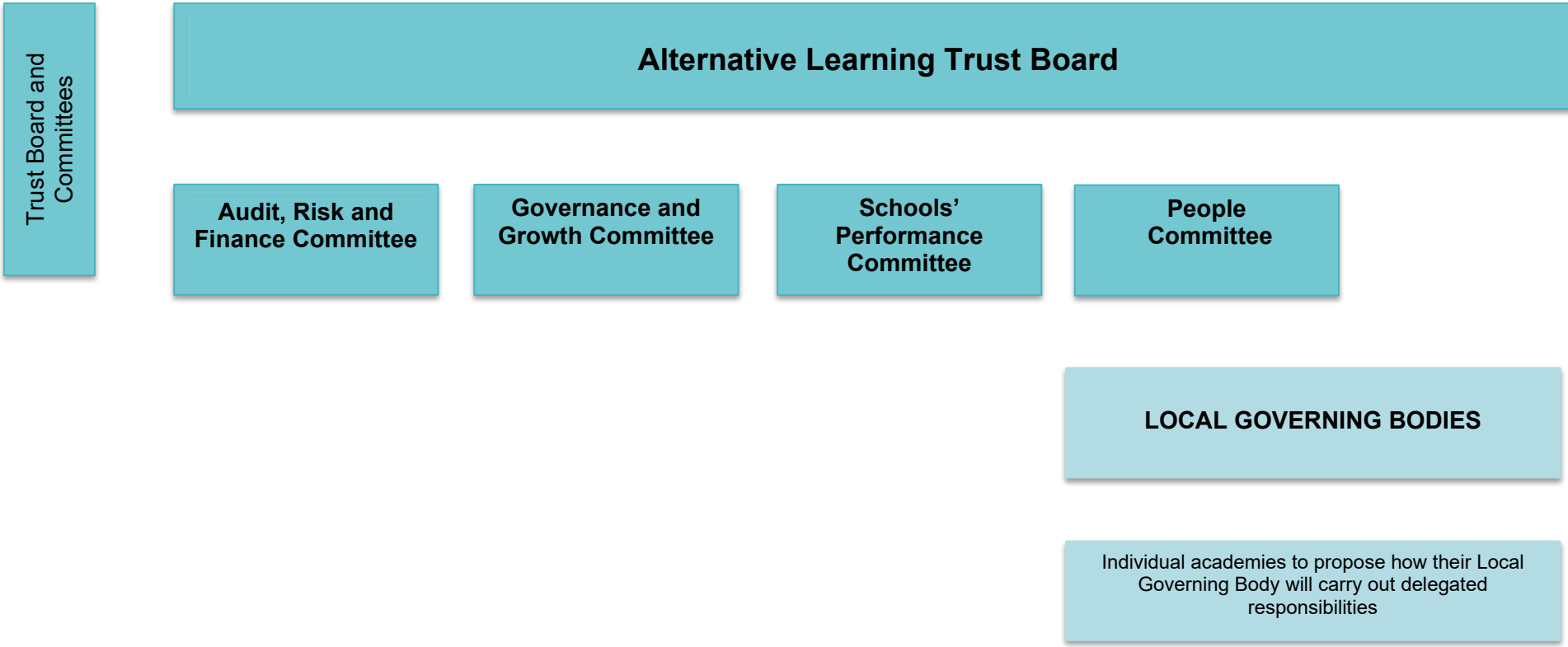
Trustees (Trust Board and Audit, Risk and Finance Committee, Governance and Growth Committee)	Executive Principal/CEO and Executive Team	Local Governing Bodies (LGBs)	Headteachers
Trust Board • Maintain strategic oversight of existing and proposed land and buildings in line with latest DfE guidance. • Receive notification of any approvals relating to the Financial Levels of Authority appendix in the Scheme of Delegation through the monthly management accounts reporting system. • Approval of capital projects/ expenditure ≥ £50,000. **Audit, Risk and Finance Committee** Monitor and regularly review all aspects of estates management and development, capital programmes and projects, maintenance and repairs. **Governance and Growth Committee** During any due diligence process, assess any shared building arrangements and/or the condition of buildings and grounds, reporting to the Trust Board on areas where capital investment may be required. **Academy Trust Handbook** Prior approval must be obtained from the DfE for the following transactions: acquisition or disposal of Freehold of land or buildings.	• Take a strategic view of management of land and buildings. • Land and Buildings Collection Tool (LBCT) completed and submitted to the DfE prior to the published deadline dates. • Provide access to consultants to carry out land and building surveys as part of due diligence. • Support DfE building three-year property/condition surveys which can be used to attempt to access funding. • Assist with DfE data collection surveys. • Work with schools to access funding associated with successful bids (Condition Improvement Fund - CIF). • Support with recruitment of estates staff. • Support and build health, safety and other statutory compliance across all estates with monitoring checklists for Business Managers and Site Teams. • Sustainably manage energy, water and other resources. • Procure appropriate estate services. • Ensure maintenance is effectively planned and prioritised. • Optimise sharing of knowledge, skills and best technical practice across sites. • Approve capital programmes/ projects up to £50,000. Such approval to be reported to Trustees through monthly management accounts.	• Ensure estates/premises reports are reviewed and scrutinised at each full LGB meeting. Discussion and challenge to be recorded in the minutes. • Ensure approval of capital expenditure is recorded in LGB minutes at the meeting immediately following the approval process. • Ensure that any expenditure over £5,000 (and the sourcing of three quotes) is reported to the LGB, the matter is minuted.	• Ensure estates/buildings (and critical incident/business continuity plans) are maintained as standing items on risk registers. • Ensure approval of capital expenditure is reported to the LGB and recorded in the minutes at the meeting immediately following the approval process. • For tendering procedures and whether there is a need to obtain three quotes, refer to the Trust's Finance Manual point 7.14. • Ensure that any expenditure over £5,000 is supported by obtaining three quotes and inform the Trust's Estates Team and LGB to make sure they are aware of planned estates' work. • Ensure that if the work to be carried out relates to the use of related parties, the Trust's Finance Team is notified before proceeding with the quote or the planned work.

Appendix 1

Trust Governance Diagram
Alternative Learning Trust



Appendix 2


Trust Board and Committees
Alternative Learning Trust Board
Audit, Risk and Finance Committee
Governance and Growth Committee
Schools' Performance Committee
People Committee
LOCAL GOVERNING BODIES
Individual academies to propose how their Local Governing Body will carry out delegated responsibilities

Appendix 3 Financial Levels of Authority *(* to be reported to Trustees via monthly management accounts)*

	Trust Board	Local Governing Body	CEO/AO DCEO CFO	COO	(Exec Hub-) Head teacher	Head of School	School Business Manager
Approval of Annual Budget/3-year plan	Approval	Recommendation					
Virements (no impact on bottom line) < £10,000, exceptional only					✓	✓	
Virements (no impact on bottom line) ≥ £10,000, exceptional only		Recommendation from LGB			✓ *	✓*	
Authorise expenditure (orders, invoices) < £5,000							✓
Authorise expenditure (orders, invoices, advertising of tenders) > £5,000 - ≤ £20,000				✓	✓	✓	
Authorise expenditure (orders, invoices, advertising of tenders) > £20,000 - ≤ £50,000		✓	✓				
Authorise expenditure (orders, invoices, advertising of tenders) ≥ £50,000	✓						
Petty cash payments					✓	✓	
School purchase cards Authorisation (*)			✓ (for D CEO) ✓ (CFO for CEO)		✓ (for SBM)	✓ (for SBM)	✓ (for HT/HoS/ staff users)
Capital purchase, programme/ projects ≥ £5,000 - ≤ £20,000				✓	✓	✓	
Capital purchases, programme/ projects ≥ £20,000 - ≤ £50,000	✓ *		✓				
Capital purchases, programme/ projects ≥ £50,000	✓						
SLAs and contracts for individual schools ≤ £20,000					✓ *		
SLAs and contracts for individual schools ≥ £20,000 - ≤ £50,000				✓ *			
SLAs and contracts for individual schools ≥ £50,000	✓						
Disposal of assets < £10,000			✓ *				
Disposal of assets ≥ £10,000	✓						
Authorise appointment/salary of budgeted vacancy					✓		
Authorise appointment/salary of Trust Executive Team	✓ (People Committee)						
Authorise appointment/salary of HT, DHT, AHT			✓ *		✓		
Authorise appointment/salary of unbudgeted post			✓ *				
Authorise severance ≤ contractual obligation			✓ *				
Authorise severance ≥ £100,000	✓ (and DfE)						
Authorise severance where employee earns ≥ £150,000	✓ (and DfE)						

(*) Refer to the Trust's Staff Expenses Policy for further details

Appendix 4 HR Levels of Authority in disciplinary cases

Investigations prior to escalation to a Panel Hearing	
TRUST ROLES	
Post	**To be investigated by**
Executive Principal/CEO	Trustee or External Independent Consultant
Trust's Executive Team	CEO/Executive Principal or External Independent Consultant
All other Trust roles	Member of Executive Team
ACADEMIES (SCHOOLS) WITHIN THE TRUST	
Post	**To be investigated by**
Headteacher/Head of School	Governor or External Independent Consultant
School SLT	Member of the Central Trust Team or External Independent Consultant
School staff below SLT level	One member of SLT (other than the Headteacher/Head of School)

Panel procedure for school staff below Senior Leadership Team (SLT)

Stage	**Person or Panel responsible**	**Outcome**	**Appeal**	**Outcome**
Stage One	Headteacher or nominated Senior Manager (with support from Business or HR)	No formal action; informal management action; First Written Warning; Final Written Warning. May refer potential gross misconduct cases to Governors (Stage Three)	Panel of Governors (convened by Governance Professional/ Clerk to Governors)	Confirm, overturn, or amend the original decision
Assessment and monitoring period	Senior or Line Manager	Confirm conduct has improved and end formal process; or escalate to the next stage if conduct does not improve	n/a	n/a
Stage Two	Headteacher or nominated Senior Manager (with support from Business or HR)	No formal action; Final Written Warning or refer to Stage Three if dismissal may be considered	Panel of Governors (convened by Governance Professional/ Clerk to Governors)	Confirm, overturn, or amend the original decision

Stage	Person or Panel responsible	Outcome	Appeal	Outcome
	Note: normally the same manager as Stage One			
Stage Three	Executive Team member and two Governors	No formal action; written warning or other sanction; Dismissal (with notice or summary dismissal for gross misconduct)	CEO and two Trustees (convened by Governance Professional)	Confirm, overturn, or amend decision; reinstate employee if dismissal is overturned

Panel procedure for school SLT

Stage	Person or Panel responsible	Outcome	Appeal	Outcome
Stage One	Member of the Executive Team (with support from Business Manager or HR)	No formal action; informal management action; First Written Warning; Final Written Warning. May refer potential gross misconduct cases to Governors (Stage Three)	Panel of Governors (convened by Governance Professional/ Clerk to Governors)	Confirm, overturn, or amend the original decision
Assessment and monitoring period	Senior or Line Manager	Confirm conduct has improved and end formal process; or escalate to the next stage if conduct does not improve	n/a	n/a
Stage Two	Member of the Executive Team (with support from Business Manager or HR) Note: Normally the same manager as Stage One	No formal action; Final Written Warning; or refer to Stage Three if dismissal may be considered	Panel of Governors (convened by Governance Professional/ Clerk to Governors)	Confirm, overturn, or amend the original decision
Stage Three	Executive Team member and two Governors	No formal action; written warning or other sanction; dismissal (with notice or summary dismissal for gross misconduct)	CEO and two Trustees (convened by Governance Professional)	Confirm, overturn, or amend decision; reinstate employee if dismissal is overturned

Panel procedure for Central Trust Team

Stage	Person or Panel responsible	Outcome	Appeal	Outcome
Stage One	Senior or Line Manager	No formal action; informal management action; First Written Warning; Final Written Warning. May refer potential gross misconduct cases to Governors (Stage Three)	Panel of Trustees (convened by Governance Professional)	Confirm, overturn, or amend the original decision
Assessment and monitoring period	Senior or Line Manager	Confirm conduct has improved and end formal process; or escalate to the next stage if conduct does not improve	n/a	n/a
Stage Two	Senior or Line Manager Note: Normally the same manager as Stage One	No formal action; Final Written Warning; or refer to Stage Three if dismissal may be considered	Panel of Trustees (convened by Governance Professional)	Confirm, overturn, or amend the original decision
Stage Three	Three Trustees	No formal action; written warning or other sanction; dismissal (with notice or summary dismissal for gross misconduct)	Three Trustees (convened by Governance Professional)	Confirm, overturn, or amend decision; reinstate employee if dismissal is overturned

Grievance procedure for staff below SLT

Stage	Person or Panel responsible	Role/Responsibility
Informal process	Line Manager or a member of SLT	Discuss the concern informally and attempt early resolution where possible
Formal Grievance	Headteacher or a member of SLT	Acknowledge receipt of the grievance and determine the appropriate next steps in line with policy
Investigation procedure	Investigating officer (may be a senior member of staff not involved)	Gather evidence, interview relevant parties, and produce an investigation report
Formal Grievance outcome	Headteacher	Provide the written outcome and explain the right to appeal
Appeal Hearing	Executive Team member and two Governors (convened by Governance Professional/Clerk to Governors)	Review the decision and process to ensure fairness and adherence to policy Confirm, overturn or amend the original decision and issue the final outcome

Grievance procedure for SLT

Stage	Person or Panel responsible	Role/Responsibility
Informal process	*Line Manager	Discuss the concern informally and attempt early resolution where possible
Formal Grievance	Executive Trust Team	Acknowledge receipt of the grievance and determine the appropriate next steps in line with policy
Investigation procedure	Investigating officer (maybe a member of the Trust Central Team or External Independent Consultant)	Gather evidence, interview relevant parties, and produce an investigation report
Formal Grievance outcome	Executive Trust Team	Provide the written outcome and explain the right to appeal
Appeal Hearing	Executive Team member and two Governors (convened by Governance Professional/Clerk to Governors)	Review the decision and process to ensure fairness and adherence to policy Confirm, overturn or amend the original decision and issue the final outcome

*Where the grievance relates to the employee's line manager, the matter will be handled by an appropriate member of the Executive Trust Team in order to ensure independence and impartiality in the process

Grievance procedure for Trust Central Team

Stage	Person or Panel responsible	Role/Responsibility
Informal process	*Line Manager	Discuss the concern informally and attempt early resolution where possible
Formal Grievance	*CEO	Acknowledge receipt of the grievance and determine the appropriate next steps in line with policy
Investigation procedure	Investigating officer (maybe a member of the Trust Central Team or External Independent Consultant)	Gather evidence, interview relevant parties, and produce an investigation report
Formal Grievance outcome	*CEO	Provide the written outcome and explain the right to appeal
Appeal Hearing	Three Trustees (convened by the Governance Professional)	Review the decision and process to ensure fairness and adherence to policy Confirm, overturn or amend the original decision and issue the final outcome

*Where the grievance relates to the employee's line manager or CEO, the matter will be handled by an appropriate member of the Executive Trust Team or the Chair of the Trust Board in order to ensure independence and impartiality in the process