

## Scheme of Delegation

### About The Keys Academy Trust

The Keys Academy Trust (TKAT) is a primary specialist Multi Academy Trust (MAT) comprising **thirteen** primary, infant, and junior schools. Our Articles of Association allow us to include schools with or without a religious designated character. The Keys Academy Trust is the employer of all members of staff in our schools.

Our vision is:

**We are a family of distinctive schools at the heart of the diverse communities we serve. In line with our Christian ethos, we aspire to excellent learning and pastoral care for pupils and staff and are committed to being open and welcoming to all.**

Our values are:

- **Excellence** (striving always to do our very best, so we fulfil our potential, individually and together).
- **Love of Learning** (offering a broad, balanced, and rich curriculum, so we don't just grow in knowledge and skills, but also in our appetite to keep learning).
- **Nurture** (creating safe environments where all can flourish and become responsible and caring members of their communities).
- **Partnership** (collaborating with others, within the Trust and outside, for the benefit of all).
- **Innovation** (seeking new and better ways of teaching, using evidence – informed research to create the best conditions for learning for our pupils, our staff and our communities).
- **Integrity** (embodying honesty, demonstrating humility and grace when things go wrong, and acting transparently and wisely in all we do).

### Purpose

This Scheme of Delegation has been developed to clarify the responsibilities and powers of Members and Trustees and also those responsibilities that are delegated to the CEO, Local Governing Bodies (LGBs which are committees of the Trust), and Executive Headteachers/Headteachers/Heads of School. It covers the key aspects of the leadership and management of the Trust and its schools and is designed to ensure compliance with legal requirements.

The Scheme of Delegation sits alongside the TKAT Finance Manual which covers all financial delegations and any additional Trust policies which further define individual and collective roles and responsibilities within TKAT.

The delegations set out in this scheme are delegated to the specific Trust Committees or LGBs and any individuals unless otherwise directed or agreed by the Board of Trustees.

Delegations cannot be exercised other than by the designated board or individuals unless otherwise directed or agreed by the Trust Board.

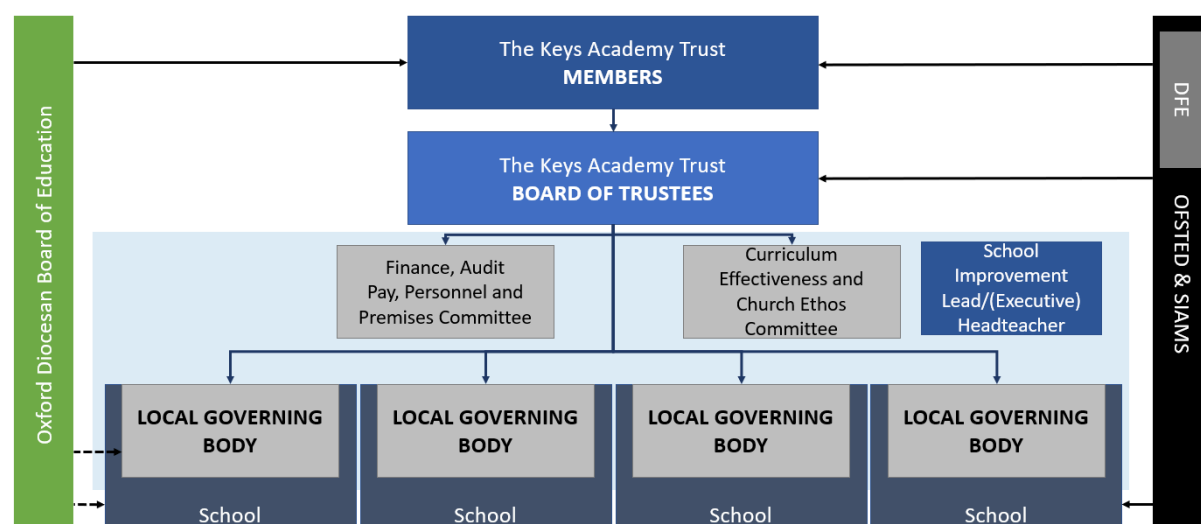
No individual trustee is empowered to make decisions on behalf of the Trust outside any specific authority set out in this Scheme of Delegation. The Chair, or, in the absence of the Chair, the Vice Chair, does however have the power to carry out functions of the Trust Board in extreme circumstances where a delay in exercising a function is likely to be seriously detrimental to the interests of the Trust, a Trust school, a pupil, a pupil's parent or guardian, or an employee. However, this power does not include matters relating to the alteration or closure of a school, a change of school category, approval of budget, disciplinary and grievance matters and admissions.

### Governance Framework

The Keys Academy Trust is the legal entity accountable for all the schools in the Trust. The Articles of Association govern the Trust. The Keys Academy Trust has a Master Funding Agreement with the Secretary of State and each school also has a supplemental funding agreement.

TKAT is a charitable company (limited by guarantee) and is responsible for the strategic direction of the Trust. It has three layers of governance: Members, Board of Trustees (including central committees) and LGBs (which are also formally committees of the Trust).

The governance structure of The Keys Academy Trust:



### Members

The Members ensure the Trust meets its charitable objects as set out in the Articles of Association. They appoint trustees, agree the Articles of Association, appoint the auditors

and receive the audited annual accounts. The Members have a limited yet distinct and vitally important role.

### Board of Trustees

The Keys Academy Trust is a charitable company (limited by guarantee) and so trustees are both charity trustees (within charity law) and company directors (within company law). Because trustees are bound by both charity and company law, the terms “trustees” and “directors” are often used interchangeably.

In line with the Academies Trust Handbook, the trustees are responsible for the general control and management of the administration of the Trust. In accordance with the provisions set out in the Memorandum and Articles of Association and its Funding Agreement, they are legally responsible and accountable for all statutory functions, for the performance of all schools within the Trust, and must approve a written Scheme of Delegation.

The Board of Trustees must appoint, in writing, an Accounting Officer, who may be appointed as a trustee. In trusts with multiple schools this should be the CEO or equivalent.

### Accounting Officer

The Accounting Officer role includes specific responsibilities for financial matters. It includes a personal responsibility to Parliament, and to the Department for Education, for the Trust’s financial resources.

Accounting Officers must be able to assure Parliament, and the public, of high standards of probity in the management of public funds, particularly regularity, propriety and value for money.

Accounting Officers must adhere to the seven principles of public life (also known as the Nolan Principles).

The Accounting Officer must have oversight of financial transactions, by:

- Ensuring the Trust’s property and assets are under the trustees’ control, and that measures exist to prevent losses or misuse
- Ensuring bank accounts, financial systems and financial records are operated by more than one person
- Keeping full and accurate accounting records to support their annual accounts.

The Board of Trustees has delegated responsibility for the three core strategic functions:

- Strategic leadership
- Accountability and assurance
- Strategic engagement

Trustees receive timely and accurate information about the performance of the Trust through its committees.

The Chief Executive Officer (CEO) will have the key strategic role in the leadership of The Keys Academy Trust and will lead the central team and provide strategic direction and monitor the effectiveness of individual schools' leadership.

### Trust Committees

There are two Committees of the Board of Trustees:

- Curriculum Effectiveness and Church Ethos (to include Governance) (CECE)
- Finance, Audit, Pay, Personnel and Premises (FAPPP)

The Trust Board has also constituted Local Governing Bodies (LGBs) which take delegated responsibility for supporting and holding to account School Leadership Teams in improving the following:

- Quality of Education
- Leadership and Management
- Financial Management
- Estate Management
- Health and Safety
- Safeguarding

The particular tasks that are delegated to LGBs are set out in the table that follows, but include:

- Agreeing and then monitoring progress towards the School Improvement Plan
- Establishing and implementing a local relevant curriculum
- Ensuring high quality teaching, learning and assessment and its continual improvement
- Ensuring teachers receive regular appraisal of their performance
- Contributing and preparing the schools self-evaluation, including the analysis of performance data
- Recommending the annual budget and monitoring expenditure against it.
- Implementing the Admissions Policy in accordance with admission law

It is important to remember however, that, even where responsibility is delegated, it is the Board of Trustees that is ultimately accountable.

The Board emphasises its commitment to individual schools sustaining their distinctive ethos and character with strong and effective LGBs working to support and challenge Executive Headteacher/Headteacher/Head of School.

The membership and responsibilities of the respective committees (including LGBs) are set out in their terms of reference. The Board of Trustees will appoint members to the committees according to their skills.

### Executive Headteacher, Headteacher and Head of School

These senior leaders occupy an influential position in society and shape the teaching profession. They are lead professionals and significant role models within the communities they serve. The values and ambitions of these senior leaders determine the achievements of schools. They are accountable for the education of current and future generations of children. Their leadership has a decisive impact on the quality of teaching and pupils' achievements in classrooms. These senior leaders lead by example the professional conduct and practice of teachers in a way that minimises unnecessary teacher workload and leaves room for high quality continuous professional development for staff. They secure a climate for the exemplary behaviour of pupils. They set standards and expectations for high academic standards within and beyond their own schools, recognising differences and respecting cultural diversity within contemporary Britain. These senior leaders, together with those responsible for governance, are guardians of the Trust's schools.

### Framework

The governance framework of the Trust, underpinned by the Academy Trust Governance Guide, is built upon the ethos of ensuring that trustees govern and managers manage. The framework enables all parties to fulfil their roles and responsibilities and provides clarity on individual and collective responsibilities and delegated responsibilities.

Any decision to delegate a task/responsibility is made by the full Board of Trustees. Without such delegation, an individual/committee has no power to act.

This document should be read in conjunction with the job descriptions of the Chief Executive Officer, Chief Finance Officer, Chief Operations Officer and Executive Headteacher/Headteacher/Head of School as well as the TKAT Guidance for LGBs, the Terms of Reference for the Board and Committees (including LGBs), the Trust's Finance Manual and any additional Trust policies which further define individual and collective roles and responsibilities within TKAT.

The Board of Trustees is responsible for the strategic direction of the Trust and this will inform the strategic direction of the individual schools belonging to TKAT. The committees can be delegated authority to make decisions, monitor, evaluate and review particular plans, policies and targets. The Chief Executive Officer and the Central Team play a major role in formulating plans, policies and targets to bring to committees or to the Board of Trustees for discussion prior to adoption.

Although decisions may be delegated, the Board of Trustees remains responsible for any decision made under delegation.

The Chief Executive Officer and the Executive Headteacher/Headteacher/Head of School are responsible for internal organisation, management and control of the schools and are accountable to the Board of Trustees.

As part of its responsibilities, the Board of Trustees will ensure that this document is reviewed annually, and whenever there are changes to TKAT's structure and/or constitution.

### Variations to the Standard Model

Where a school requires rapid improvement across a range of operational areas as well as to the local governance function, the Trust may set up a school intervention team to manage the situation. Examples of when this may be necessary include (but are not limited to) a poor Ofsted judgement, financial concerns, poor educational outcomes and long-term Executive Headteacher/Headteacher/Head of School absence/capability. The school intervention team will monitor and evaluate agreed actions and take key decisions. The team will be chaired by the CEO and will report directly to the Board of Trustees. **If appropriate, a further measure may be the removal of the LGB and the appointment of an Interim Academy Committee (IAC). This committee would be responsible for the governing arrangements within the school. There is a separate scheme of delegation for a school in this position.** These changes will be communicated clearly to the school and its LGB and a date to review this will be set.

## Scheme of Delegation

<b>Reading the grid</b>
✓ - governance function and decision-making are at this level
Note: Decisions delegated to the Trust Board may be delegated to a board committee but not to the CEO, an LGB or (Executive) Headteacher

Governance function			Members	Trust Board	FAPPP	CECE	CEO / Accounting Officer	LGB	Exec HT/ HT
<b>1.1 Governance framework: people</b>	1.1.1	Members: appoint/remove	✓						
	1.1.2	Trustees: appoint/remove	✓						
	1.1.3	Trustees: recommend appointment and removal to Members		✓					
	1.1.4	Chair of the Board: appoint and remove	✓						
	1.1.5	Vice-Chair of the Board: appoint and remove		✓					
	1.1.6	Board committee chairs: appoint and remove		✓					
	Governance function		Members	Trust Board	FAPPP	CECE	CEO / Accounting Officer	LGB	Exec HT/ HT

	1.1.7	Named Safeguarding Trustee: appoint and remove		✓					
	1.1.8	Named SEND Trustee: appoint and remove		✓					
	1.1.9	LGB Chairs: appoint and remove		✓					
	1.1.10	LGB Chairs: elect and propose to Trust Board						✓	
	1.1.11	Chair of any LGB Finance Committee: appoint and remove		✓					
	1.1.12	Elect and propose Chair of LGB Finance Committee Chair of LGB Finance Committee elect and propose to Trust Board						✓	
	1.1.13	Chairs of any other LGB Committees: appoint and remove						✓	
	1.1.14	LGB Foundation, Trust Appointed and any Associate Local Governors. Appoint and remove.		✓					
	1.1.15	Ensure safeguarding checks completed for any newly appointed local governors or associate local governors including Parent and Staff Local Governors.						✓	
	1.1.16	LGB Parent and Staff Local Governors. Notify Trust when elected and of resignations/end of Terms of Office						✓	
	1.1.17	Governance Professional to Board: appoint and remove		✓					
	1.1.18	LGB Parent and Staff Local Governors: remove		✓					
	1.1.19	LGB Governance Professional and any LGB committees: appoint and remove						✓	



	1.1.20	Chair of FAPPP Committee with financial expertise: appoint and remove		✓					
	1.1.21	Local governor with responsibility for safeguarding: appoint						✓	
	1.1.22	Local governor with responsibility for safeguarding: remove		✓					
<b>1.2 Governance framework: systems and structures</b>	1.2.1	Memorandum and Articles of Association: review and agree	✓						
	1.2.2	Governance structure for the Trust: establish and review annually		✓					
	1.2.3	Trust Committee Terms of Reference and Scheme of Delegation: agree annually		✓	✓	✓			
	1.2.4	LGB Terms of Reference: review		✓					
	1.2.5	LGB Terms of Reference: approve						✓	
	1.2.6	Scheme of Delegation: implement and comply	✓	✓	✓	✓	✓	✓	✓
	1.2.7	Scheme of Delegation: agree annually		✓					
	1.2.8	LGB Committee Terms of Reference: agree						✓	
	1.2.9	Trustee Register of Business Interests: complete annually (or as required)		✓					
	1.2.10	Local Governor Register of Business Interests: complete annually (or as required)						✓	

	1.2.11	Trustee conflicts of interest and related party transactions: manage		✓					
	1.2.12	LGB conflicts of interest and related party transactions: manage						✓	
	1.2.13	Annual schedule of trustee governance business: agree		✓					
	1.2.14	Annual schedule of LGB governance business: agree						✓	
	1.2.15	Skills Audit of Trust board and Trust committees: complete at least annually		✓					
	1.2.16	Skills Audit of LGBs: complete at least annually							
	1.2.17	Chair of Trust performance: carry out 360° review periodically		✓					
	1.2.18	Trustee contribution to effective governance: review annually		✓					
	1.2.19	LGB member contribution to effective governance: review annually						✓	
	1.2.20	Intervention Boards: appoint (if necessary)		✓					
	1.2.21	Inspections of Trust schools: attend		✓			✓	✓	
	1.3.1	Governance arrangements on Trust website: publish and ensure compliance					✓		
	1.3.2	Governance arrangements on schools' websites: publish and ensure compliance							✓
	1.3.3	Statutory Accounts: submit to members and publish on website		✓					

<b>1.3 Governance framework: reporting</b>	1.3.4	Annual self-review/triannual external review of board effectiveness: submit to members		✓					
	1.3.6	Annual report and accounts including accounting policies, signed statement on regularity, propriety and compliance, incorporating governance statement demonstrating value for money: submit to members, ESFA and Companies House		✓					
	1.3.7	Annual Report to LGBs on Trust Performance: submit to LGBS				✓			
	1.3.8	LGB Report to Trust: submit						✓	

Governance function			Members	Trust Board	FAPPP	CECE	CEO / Accounting Officer	LGB	Exec HT/ HT
2.1 Being strategic	2.1.1	Determine Trust's vision, values, strategy, culture and key priorities: approve		✓					
	2.1.2	Determine schools' vision, values, strategy, culture and key priorities: approve						✓	
	2.1.3	Pipeline of schools and application for school academy orders to join the Trust: agree pipeline and approve applications		✓					
	2.1.4	Determine Trust-wide policies which reflect the trust's ethos and values: approve, monitor and upload to Trust website		✓					
	2.1.5	Determine school level policies: approve, monitor and upload to school website						✓	
	2.1.6	Management of Trust risk: establish risk register, review and monitor		✓					
	2.1.7	Management of school risk: establish risk register, review and monitor		✓				✓	
	2.1.8	Change in a school's PAN: approve		✓					
	2.1.9	Change in a school's age range: approve		✓					
	2.1.10	Engagement with stakeholders: ensure		✓			✓	✓	✓
	2.1.11	School Day and School Year: agree		✓			✓		

	2.1.12	Uniform Policy: approve		✓				✓	
<b>2.2 Admissions and Attendance</b>	2.2.1	Determine all schools' admissions policies: approve		✓					
	2.2.2	School admissions policy: review model policy, consult and propose any changes					✓		
	2.2.3	Admissions appeals: inform CEO, prepare and present admissions appeals to the appeals panel (ODBE / LA)						✓	
	2.2.4	Admissions appeals: monitor					✓		
	2.2.5	Admissions: monitor		✓	✓	✓		✓	
	2.2.6	Attendance Register: maintain							✓
	2.2.7	Attendance: report					✓		✓
	2.2.8	Attendance: review		✓				✓	
	2.2.9	Statutory duties of Attendance: implement							✓
	2.2.10	Statutory duties of Attendance: monitor						✓	
	2.2.11	Attendance training for staff: deliver							✓
	2.2.12	Attendance management and effective practice: share					✓		

<b>2.3 Suspensions and Exclusions</b>	2.3.1	Suspensions: approve					✓		
	2.3.2	Suspensions: inform CEO and LGB Chair and manage the process following approval by CEO.							✓
	2.3.3	Exclusions: approve					✓		
	2.3.4	Exclusions: inform CEO and LGB Chair and manage the process following approval by CEO.							✓
	2.3.5	Exclusions: inform LGB Chair of a cancellation plus reasons.							✓
	2.3.6	Suspensions and Exclusions, and cancellations of Suspensions and Exclusions: report to the Trust Board and the LGB.					✓		✓
	2.3.7	Rate of Suspensions and Exclusions: monitor		✓					

Governance function			Members	Trust Board	FAPPP	CECE	CEO / Accounting Officer	LGB	Exec HT/ HT
<b>3.1 Holding to account</b>	3.1.1	Ensuring Trust compliance (e.g. safeguarding, H&S, employment, equalities, SEND, GDPR): agree, auditing, reporting arrangements		✓					
	3.1.2	Ensuring school compliance (e.g. safeguarding, H&S, employment, equalities, SEND, GDPR): agree monitoring and reporting arrangements						✓	
	3.1.3	Following identification of non-compliance (internal and external): agree reporting arrangements and monitor progress		✓					
	3.1.4	Code of Conduct (Behaviour policy for Trust central team and school staff): approve		✓					

	3.1.5	Code of Conduct (Behaviour policy for Trust central team): ensure compliance					✓		
	3.1.6	Code of Conduct (Behaviour policy for school staff): ensure compliance							✓
	3.1.7	Code of Conduct (Behaviour policy for trustees): comply		✓					
	3.1.8	Code of Conduct (Behaviour policy for local governors): comply						✓	
	3.1.9	Grievances, capability and disciplinary cases from Trust central team staff: manage					✓		
	3.1.10	Grievances, capability and disciplinary cases from school staff: manage							✓
	3.1.11	All formal complaints, serious safeguarding issues, staff capability and disciplinary issues, health and safety breaches, any incidences of emergency services called to school sites (including police, fire and ambulance): inform CEO							✓
	3.1.12	All school software systems (including Assessment, Accounting, HR, Payroll, Safeguarding, Premises, Asset management): approve					✓		
	3.1.13	Contact from any Media source: inform CEO and LGB							✓
	3.1.14	External communications to media sources: approve					✓		

Governance function	Members	Trust Board	FAPPP	CECE	CEO / Accounting Officer	LGB	Exec HT/ HT
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4.1 Pay and Personnel oversight	4.1.1	CEO/Accounting officer: appoint and dismiss		✓					
	4.1.2	CFO: appoint and dismiss		✓					
	4.1.3	Headteachers/Hub Leaders: appoint and dismiss		✓					
	4.1.4	Headteachers/Hub Leaders: convene recruitment panel (in association with ODBE)					✓		
	4.1.5	Headteachers/Hub Leaders: recommend appointment (with the consent of ODBE) and dismissal					✓		
	4.1.6	Trust Central Team: appoint and dismiss					✓		
	4.1.7	Trust's Central Team staffing structure: agree		✓					
	4.1.8	Trust's Central Team: convene recruitment panel					✓		
	4.1.9	School Staff: appoint and dismiss							✓
	4.1.10	School Staff: redundancy and dismissal (requires CEO approval)					✓		
	4.1.11	Schools' staffing structure: propose						✓	
	4.1.12	Staff appraisal policy: review and agree		✓					
	4.1.13	CEO and CFO pay award: review and agree		✓					
	4.1.14	CEO Performance Management: review and agree		✓					



	4.1.15	CFO Performance Management : review and agree					✓		
	4.1.16	Trust Central Team Performance management and pay award: review and agree					✓		
	4.1.17	Headteacher performance management and pay award led by CEO and LGB Chair : review and agree					✓		
	4.1.18	Staff performance management and pay award: review and agree					✓		
	4.1.19	Oversight and monitoring of staff wellbeing and workload		✓			✓		

Governance function			Members	Trust Board	FAPPP	CECE	CEO / Accountin g Officer	LGB	Exec HT/ HT
<b>5.1 Financial oversight</b>	5.1.1	External Auditors: appoint	✓						
	5.1.2	External auditors' report and management letter: receive and respond		✓					
	5.1.3	Trust's scheme of financial delegation: establish, monitor and review		✓					
	5.1.4	Trust's scheme of financial delegation: comply						✓	
	5.1.5	Budget plan to support delivery of trust key priorities: propose					✓		
	5.1.6	Budget plan to support delivery of trust key priorities: approve		✓					
	5.1.7	Budget plan to support delivery of schools' key priorities: propose							✓

	5.1.8	5.1.8 Budget plan to support delivery of schools' key priorities: approve		✓				✓	
	5.1.9	Trust Budget Monitoring Return to DfE: approve		✓					
	5.1.10	School Budget Monitoring Return to DfE: approve		✓				✓	
	5.1.11	Pupil premium spend including PE and Sport Premium: agree expenditure and rationale						✓	
	5.1.12	Pupil premium spend including PE and Sport Premium: monitor expenditure and rationale				✓		✓	
	5.1.13	Benchmarking and Trust wide value for money: report to FAPP on robustness on a termly basis			✓		✓		
	5.1.14	Management accounts: review			✓			✓	
	5.1.15	Cash management: monitor			✓				
	5.1.16	Investment strategy: approve		✓					
	5.1.17	Annual programme of internal scrutiny: approve		✓	✓				
5.2 Data Protection	5.2.1	GDPR and Trust's data protection policy and procedures: ensure compliance					✓		
	5.2.2	GDPR and Trust's data protection policy and procedures: evaluate		✓					

	5.2.3	GDPR and Trust's data protection policy and procedures: implement					✓		✓
	5.2.4	GDPR and Trust's data protection policy and procedures: monitor		✓				✓	

<b>5.3 Online Safety (Cyber Security)</b>	5.3.1	Trust's Online policy and procedures: ensure compliance					✓		
	5.3.2	Trust's Online policy and procedures: evaluate		✓					
	5.3.3	Trust's Online policy and procedures: implement					✓		✓
	5.3.4	Trust's Online policy and procedures: monitor		✓				✓	

Governance function			Members	Trust Board	FAPPP	CECE	CEO / Accounting Officer	LGB	Exec HT/ HT
<b>6.1 Estates Management Oversight</b>	6.1.1	Determine Trust's estate vision, strategy and key priorities: approve		✓					
	6.1.2	Determine school's estate vision, strategy and key priorities: approve						✓	
	6.1.3	Additions and disposals of land and buildings: propose		✓				✓	
	6.1.4	Additions and disposals of land and buildings: approve (approval to be obtained from DfE where appropriate)		✓					
	6.1.5	Change in use of buildings: propose		✓				✓	
	6.1.6	Change in use of buildings: approve (approval to be obtained from DfE where appropriate)		✓					
	6.1.7	Day to day health and safety compliance: implement							✓

	6.1.8	Health and safety compliance: monitor		✓				✓	
	6.1.9	Health and safety compliance: review and evaluate		✓					
	6.1.10	Approve insurance provider for all schools		✓					

		Governance function	Members	Trust Board	FAPPP	CECE	CEO / Accounting Officer	LGB	Exec HT/ HT
7.1 Standards and Achievement oversight	7.1.1	School Self Evaluation Form (SEF) and School Improvement Plan (SIP) in line with Trust priorities: set and implement						✓	✓
	7.1.2	SEF and SIP: approve, monitor and evaluate effectiveness				✓		✓	
	7.1.3	Set targets for overall pupil achievement: propose						✓	✓
	7.1.4	School targets: agree and monitor (via CEO reports to CECE committee)				✓			
	7.1.5	Pupil progress and achievement; monitor				✓		✓	
	7.1.6	Standards of Achievement for all Pupils (including disadvantaged and SEND): monitor				✓		✓	
	7.1.7	Trust approach to curriculum and assessment, with regard to statutory requirements: agree		✓					
	7.1.8	School curriculum and assessment in line with Trust approach: set and deliver							✓
	7.1.9	School curriculum and assessment in line with Trust approach: monitor						✓	

	7.1.10	Deliver EYFS in line with statutory requirements: monitor						✓	
	7.1.11	Term dates and Inset days for all schools: identify					✓		