

Ormiston Academies Trust

Scheme of delegation

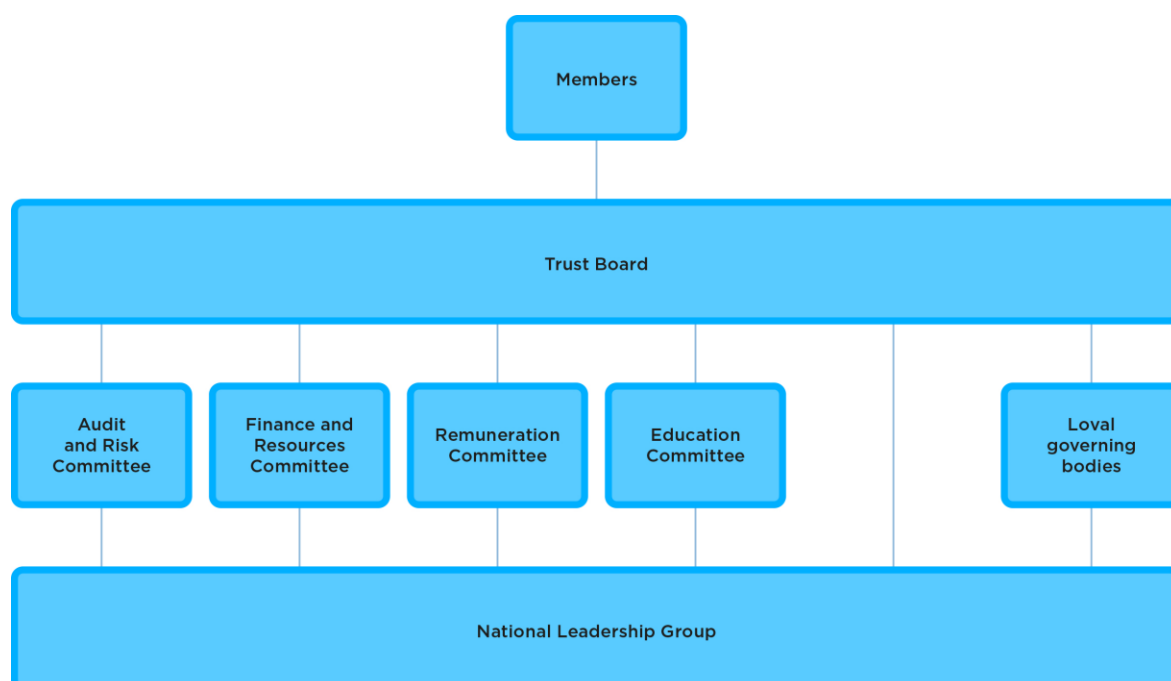
Document version control

Policy type	Statutory
Author	Head of Governance
Approved by	Trust Board, September 2025
Release date	September 2025
Next release date	September 2026
Description of substantive changes	▪ Delegations to Board Committees included

1. Our story

- 1.1. Peter Murray and his family set up Ormiston Trust in 1969, in memory of his sister Fiona Ormiston Murray. Ormiston Academies Trust (OAT) was then set up in 2009. We work, in her name, to provide the very best learning opportunities for young people.
- 1.2. OAT is one of the largest not-for-profit multi-academy trusts in England. Our aim as a charity, alongside our schools, is to help provide local children with a great education. We believe that removing barriers to learning will improve the life chances of children and young people. We want all those who pass through Ormiston academies, children, young people, staff, and visitors to care about how we can maximise potential through learning.
- 1.3. OAT is a family of academies where we make sure that the young people in our care have access to the best education by collaborating and innovating. Success is not just about achieving the highest grades, but ensuring young people have the opportunity to develop aspirations, positive attitudes and life skills through core and the wider enrichment curriculum. We want our children to have choices in life.

2. OAT governance structures



2.1. Members

- 2.1.1. As a charitable company, OAT must have members. Members have a have a similar role to shareholders of a company limited by shares. Members hold the trust board to account for the effective governance of the trust but have minimal involvement in running the trust. Members are external to OAT and appointed by Ormiston Trust.

- 2.1.2. Members are essential to the integrity of an academy trust governance structure. There are some critical decisions that sit with the members; they must remain informed of trust performance and maintain a relationship with the trust board.

2.2. Trust board

- 2.2.1. The trust board has overall responsibility and ultimate decision-making authority for all the work of the trust. The trust board ensures that the trust complies with all legal and statutory requirements. Trustees appointed to the trust board are volunteers that have been appointed in line with OAT's Articles of Association. The CEO is also a trustee.

2.3. Board sub-committees

- 2.3.1. The trust board currently has four sub-committees, as set out below:

- Audit and risk committee
- Education committee
- Finance and resources committee
- Remuneration committee

- 2.3.2. The Audit and risk, Education, and Finance and resources sub-committees meet at least termly, and the Remuneration sub-committee meets at least annually.

2.4. Executive team

- 2.4.1. The executive team is a group of employees responsible for the day-to-day running of the organisation, focusing on the education performance and operations of the academies. The executive team operate under the leadership and direction of the CEO, who is by virtue of position a trustee of the trust. The executive team works directly with head office staff, staff in each academy and local governing bodies to ensure that the required outcomes are achieved in accordance with the direction of vision of the trust board.

2.5. OAT national leadership group

- 2.5.1. The OAT National Leadership Group, through the OAT central team, provides support to the academies. The OAT National Leadership Group and staff are responsible for working with academies to deliver educational and operational outcomes. The board discharges the provision of all training/ support systems for academies to the OAT National Leadership Group. Decisions of the OAT National Leadership Group may be made by the group collectively or by individuals within the group depending on the relevant approved policy and procedures.

2.6. Education directors (EDs)

- 2.6.1. The board discharges management of the academies, strategic planning and line management of Principals and Senior Principals through the Chief Executive and Directors of Education (Secondary, Primary and Alternative Provision & Special) and onto Regional Education Directors for Secondary.
- 2.6.2. The Education Directors are also there to develop and maintain strong relationships with the Chairs of Governors and clerks to the governing bodies

2.7. Local governing body (LGB)

- 2.7.1. Every academy has an LGB, or is part of a Joint LGB, and membership includes the principal, community, staff, and parent governor roles. The LGB is responsible for supporting the school and providing effective challenge around the strategic direction and performance of the academy within the framework and parameters set by the trust board.

2.8. Interim advisory board (IAB)

- 2.8.1. Where it is deemed that an LGB is not performing as it should, the trust board may implement an IAB in its place. The purpose of the IAB is to secure governance of the academy, developing a sound basis for improvement and will be in place until the trust board deems it appropriate. The executive team will implement partnership working with an IAB to determine priorities and set targets.

2.9. Principals

- 2.9.1. Responsible for delivering all educational and operational outcomes in their individual academy.

3. Decision-making framework

- 3.1. Strategic Financial and Operational management for all academies is led by OAT central teams who will work closely with Education Directors on this. The board discharges management of the academies financial planning and line management of academies finance through the Chief Executive, Chief Financial Officer, and Finance Director to Regional Finance Partners. The Regional Finance Partners are responsible for partnering strategic financial management of all academies in a region including implementation of financial processes, financial planning, and reporting and financial line management of regional finance staff who are based in academies. They are also responsible for financial partnering to regional education directors and other functions at a regional level.
- 3.2. OAT believes that this model allows for strategic board decision-making and focused local governance. Flows of information and decision making are coordinated by the central governance team who oversee all governance, including clerking across the trust, and are embedded into the scheme of delegation, meeting cycles, and agenda planners. This ensures that trustees and governors work together to support meaningful improvement across the trust – and as governors spend less time on policies and paperwork, it means that they can spend more time understanding the specific needs of their school and adapt their activities accordingly. They are central to the focus on the academy's values and ethos so that all students believe they can succeed.
- 3.3. They also provide an especially important continuity of care role to the academy and as such are a continuing powerful advocate for their needs within the OAT family and for linking with their communities.
- 3.4. This document does not detail every legal responsibility of a MAT or every activity in the remit of individual stakeholders. Instead, it is concerned with the core activities that are conducted within each area of operational delivery and how they are coordinated between the various decision makers.
- 3.5. The overriding legal assumption that sits behind this work is that all OAT academies are governed by one trust and a single board of directors (Trustees). The board of directors (Trustees) is an accountable body for legal purposes but can delegate many of its functions (for example to the CEO and their direct reports).

- 3.6. This framework does not dictate when responsibilities may be further delegated within sets of stakeholders – for example by a principal to other staff within the school, or the OAT Chief Executive to other staff within the central team. Some regions operate with a Senior Principal/Head of School model; where this is the case, a separate document will set out how Principal responsibilities are discharged.
- 3.7. There will be circumstances where the rules may change – for example in crisis situations, OAT central may take on a much more involved role or where stakeholders may go above and beyond the level of support that is articulated here – for example, the LGB may be engaged on a range of other aspects not explicitly referenced here.
- 3.8. The decision-making framework is reviewed on an annual basis in order to ensure that delegated responsibilities can be aligned with organisational need.

3.9. High level division of responsibilities

- 3.9.1. The following tables set out the responsibilities and decision-making authority in areas where it is important to define the role of different leaders across the Trust. It does not prescribe every activity in the remit of individual leaders.
- 3.9.2. Policies listed are indicative - a full list of policies is maintained by the central team and made available to all OAT staff via the staff intranet (OATnet). Key policies are accessible to other stakeholders (pupils, parents, governors etc.) via academy websites, the OAT Trust website or GovernorHub as appropriate.

Functional Area	Board	OAT National Leadership Group	Education Directors	Academy Principal	Local governing body (LGB)
Teaching & Learning	- Approve the strategic vision for education across the Trust. [Delegated to the Education Committee] - Accountable for the overall quality and impact of teaching.	- Responsible for the overall quality and impact of teaching across the Trust. - Responsible for maintaining a view of the quality of teaching in all academies through effective Teacher Evaluation. - Delivery of Trust wide Professional Development. - Work in partnership. ITT	- Support academy Principals in setting the strategic vision and model for teaching, arranging CPD/ coaching, and reporting on teacher performance. - Evaluate and review the quality of teaching, assessment, and student attainment within academies. - Deploy lead practitioners (if in post).	- Set and deliver the vision and model for developing teaching and approach to improving teacher quality. - Arrange CPD and / or coaching for academy staff. - Implement trust wide approaches for teacher evaluation.	Be informed on and monitor the academy approach to securing the quality and impact of teaching, including the effectiveness of CPD, and coaching of staff.

Functional Area	Board	OAT National Leadership Group	Education Directors	Academy Principal	Local governing body (LGB)
Curriculum & Assessment	- Approve Trust wide pupil performance targets. - Accountable for curriculum and assessment practices meeting requirements laid out in statutory guidance. - Accountable for provision of careers and destinations advice, ensuring it meets statutory requirements laid out in statutory guidance.	- Responsible for Trust wide targets, approve academy and regional targets. - Responsible for all curriculum and assessment practices, meeting requirements laid out in statutory guidance. - Determine the OAT minimum standard curriculum model. - Determine the Trust wide assessment model.	- Accountable for setting and delivering regional/ phase/ education targets. - Review and propose academy targets to the OAT NLG. - Undertake achievement reviews in line with review cycle. - Provide guidance to academies on approaches to assessment, curriculum, and inclusion.	- Accountable for meeting academy targets. - Agree academy targets with Education Director. - Ensure that academy targets relate to individual pupil targets. - Implement the Trust assessment cycle. - Develop approaches to assessment, curriculum, and inclusion.	- Be informed of and review academy approaches to curriculum, assessment, and inclusion. - Be informed of and review outputs of SEND and PP audits. - SEND and PP Link governors to participate in audit as appropriate. - Consulted on academy targets (Chair). - Review progress towards academy targets.

Functional Area	Board	OAT National Leadership Group	Education Directors	Academy Principal	Local governing body (LGB)
Curriculum & Assessment (continued)		Responsible for setting out Trust wide entitlement for careers and destinations advice beyond statutory minimums.	- Approve academy curriculum and assessment models. - Approve academy approach to careers and destinations advice. - Commission SEND and Pupil Premium Audits or Reviews.	- Contribute to the ongoing development and resourcing of OAT Base curriculum. - Engage with SEND and Pupil Premium Audit Process. - Implement Reading strategy. - Accountable for provision of careers and destinations advice in line with Trust statutory requirements.	Review academy approach to careers, destinations, and advice.

Functional Area	Board	OAT National Leadership Group	Education Directors	Academy Principal	Local governing body (LGB)
Culture, ethos, and wellbeing	- Accountable for ensuring behaviour, exclusion, safeguarding and SEND meet national requirements laid out in statutory guidance. - Approve Safeguarding Policies - Approve Exclusions Policies.	- Responsible for ensuring trust wide practices around behaviour, exclusion, safeguarding and SEND meet national requirements laid out in statutory guidance. - Set Trust wide Safeguarding Policies. - Set Trust wide Exclusions Policies. - Facilitate Trust wide SEND network. - Arrange Exclusions training and independent review panels (IRPs)	- Provide guidance to academies on a positive approach to culture, behaviour, ethos, personal development, and wellbeing. - Provide guidance to Principals to ensure effective pastoral arrangements and adherence to safeguarding and child protection policies. - Sign off Permanent Exclusions and review suspension data. - Review attendance data.	- Set academy approaches to culture, ethos, personal development, and wellbeing including the behaviour model and routines, attendance, and inclusion practices within OAT guidance. - Ensure compliance with OAT policies and guidance on statutory responsibilities.	- Be informed on and review academy approach to culture, ethos and wellbeing including behaviour model and routines, attendance, and inclusion. - Chair/ attend Exclusion governor panels and engage in Independent Review Panel process if required. - Informed of safeguarding complaints, referrals, and training within academy.

Functional Area	Board	OAT National Leadership Group	Education Directors	Academy Principal	Local governing body (LGB)
Culture, ethos, and wellbeing (continued)		- Undertake annual safeguarding audits and report to Board. - Respond to issues flagged by DBS. - Respond to any complaints against Principal and support the academy in the event of complaints against staff. - Undertake annual pupil voice survey to capture trust wide trends.	- Review academy mobility trends. - Be aware of pupil voice across the individual academies and across regions.	- Implement effective academy attendance, inclusion, and safeguarding procedures inc. training and DBS processes within OAT policies. - Set internal exclusions procedures and ensure exclusion administration fulfils ensure exclusion administration fulfils all relevant requirements for these, suspensions, and permanent exclusions.	- Participate in safeguarding audit (safeguarding link governor). - Attend relevant training e.g., annual safeguarding training and regular PEX-related training. - Be informed of and review pupil voice feedback on pupils' experience in academy.

Functional Area	Board	OAT National Leadership Group	Education Directors	Academy Principal	Local governing body (LGB)
Culture, ethos, and wellbeing (continued)				- Respond to safeguarding and other complaints against staff. - Oversee referral of at-risk children to Local Authority and other agencies. - Regularly seek feedback from pupils on their experience in academy (beyond trust wide survey).	

Functional Area	Board	OAT National Leadership Group	Education Directors	Academy Principal	Local governing body (LGB)
Our People	- Approve all relevant People policies. - Accountable for meeting statutory reporting requirements. - Review outcomes of annual OAT staff survey. - Recruit the CEO and other key personnel as appropriate. - Set and deliver the process for CEO performance management. [Delegated to the Remuneration Committee]	- At Trust level, establish a culture and level of organisation which actively contributes to staff wellbeing. - Set the staff code of conduct and all relevant People policies. - Conduct the academy's Pay Award and Pay Scales process annually in consultation with unions. - Provide employee relations, KCSIE checks and SCR (Single Central Record) reporting, payroll, pensions, and recruitment training	- Develop People plan for academies within their region to ensure staffing structures, skill sets, and future workforce plans are in place and within budget, and that risks identified in HR monitoring and reports are acted upon. - Oversee Principal and Executive Principal Appointments and inductions. - Participate in SLT recruitment and sign-off on SLT appointments.	- At academy level, establish a culture and level of organisation which actively contributes to staff wellbeing. - Engage with JCC (Joint Consultation Council –local unions) - Approve, recruit for, and induct to academy roles in line with OAT recruitment process. - Implement OAT approach to performance appraisal, probation, leadership development, pay and benefits,	- Monitor compliance with SCR (Single Central Record) process as part of safeguarding audit (safeguarding link governor). - Consulted on Principal appointment and appraisal (Education Director to liaise directly with Chair). - Consulted on restructuring proposals. - Be informed of academy staff KPIs e.g., staff absence, recruitment, and retention data.

	- Approve the Trusts Pay Policies - Approve pay awards for executive and senior staff				
Functional Area	Board	OAT National Leadership Group	Education Directors	Academy Principal	Local governing body (LGB)
Our People (continued)		and guidance to academies. - Liaise with unions at national level, manage the National Joint Council (NJC). - Oversee all HR monitoring and reporting (e.g., absences and vacancies). - Responsible for meeting statutory reporting requirements. - Review and approve proposed changes to	- Line manages Principals in line with performance targets, supports with coaching & mentoring. - Provide strategic guidance to Principals to support staff line management according to performance targets. - Sign off for all new recruitment (replacement and new roles) in line with Trust wide recruitment processes. [Note -	disciplinary and grievance. - Ensure effective onboarding and offboarding and that SCR (Single Central Record) procedures are being followed. - Determine the academy staffing structure in line with budget requirements. - Ensure MIS is up to date with all relevant staff information.	

		trust-wide systems and processes.	finance and HR sign off is required also.]		
Functional Area	Board	OAT National Leadership Group	Education Directors	Academy Principal	Local governing body (LGB)
Our People (continued)		- Responsible for managing levels of TUPE risk identified during due diligence for new academies. - Decide on tribunal and settlement strategies. - Approve any academy reorganisations. - Undertake annual Trust wide staff survey and review trends. - Engage in Disciplinary and Grievance panels and appeals.	- Review regional talent and growth opportunities. - Ensure effective use of resources across the region to the benefit of all academies within that region. - Engage in Disciplinary and Grievance panels and appeals.		

Functional Area	Board	OAT National Leadership Group	Education Directors	Academy Principal	Local governing body (LGB)
Parents and community	Accountable for meeting statutory admissions and publication requirements	- Responsible for meeting statutory admissions and publication requirements including approval of individual academy admission policies. - Oversee admissions arrangements including policies and appeals. - Oversee compliance with website publication requirements. - Provide advice/guidance on media communications, ensuring consistency.	- Manage external relationships with local authorities and DfE Regional Directors. - Support academy engagement with parents and the wider community.	- Managing academy admissions appeals in line with OAT guidance. - Maintain effective, proactive engagement and regular communication with parents and the wider community. - Maintain academy website in line with compliance requirements and OAT guidelines. - Plan and deliver open days, offer and acceptance process and parental engagement.	- Support engagement with parents, community, and Local Authority. - Consulted on changes to admissions policy.

Functional Area	Board	OAT National Leadership Group	Education Directors	Academy Principal	Local governing body (LGB)
Parents and community (continued)		- Manage crisis communications. - Set academy brand guidelines and website design. - Undertake annual trust wide parent survey to identify and understand trends. - Provide guidance and examples of best practice on communication with parents.		Manage local media, community, and Local Authority relations with support from Education Directorate and central teams.	

Functional Area	Board	OAT National Leadership Group	Education Directors	Academy Principal	Local governing body (LGB)
Finance	- Approve all relevant Finance policies. - Approve Executive staff remuneration. - Accountable for meeting statutory requirements around reporting, budget submissions, and financial controls.	- Set all Finance policies including policies and best practice around financial control. - Propose the OAT Financial Delegation of Authority to the Risk & Audit Committee. - Approve Principal pay and benefits. - Set academy and central finance targets and budgets including setting central recharges. - Prepare trust wide consolidated budgets, forecasts, reports, statements & tax returns.	- RFPs oversee all regional accounting and finance teams. - RFPs oversee all regional accounting and finance procedures, including Scheme of Delegation. - EDs support Principal and Finance to deliver financial plans and actuals that meet top-down centrally set targets.	- Develop and propose academy revenue and capital financial plans including forecast, budgets and 3-year plans. - Deliver financial targets. - Ensure compliance with the financial Scheme of Delegation. - Determine academy staffing structure. - Engage in internal audit activities at academy level.	- Informed of finance policies and budget targets (Chair & Finance Link). - Review draft budget and 3-year plan. - Review management accounts (Finance Link). - Review capital plans and proposed funding. - Informed of procurement activity. - Review internal audit outcomes.

Functional Area	Board	OAT National Leadership Group	Education Directors	Academy Principal	Local governing body (LGB)
Finance (continued)		- Manage internal and external audits. - Accountable for meeting statutory requirements around reporting and budget submissions to Companies House and ESFA. - Decide procurement strategy, including mandating contracts and frameworks for tenders and ensure Value for Money. - Approve all contracts £50k+ and all exceptional spend.	- EDs sign-off academy budgets and staffing structures (subject to OAT NLG and the Board approval). - ED consulted on monthly management accounts. - ED reviews Principal's pay recommendation for staff.	- Deliver finance administration and internal control arrangements in line with OAT approach. - Identify and engage in activities to generate additional income, including actively engaging in letting opportunities.	Support activities to generate additional income.

Functional Area	Board	OAT National Leadership Group	Education Directors	Academy Principal	Local governing body (LGB)
Procurement and Contract Approval	Approve all contracts over the EU/Procurement Act Threshold. [Delegated to the Finance and Resources Committee]	- Decide procurement strategy, including mandating contracts and frameworks for tenders. - Approve all contracts £50k+ and all exceptional spend.	- RFPs coordinate procurement tenders within their region, signing off all contracts £30k+. - Recommend all contracts £50k+ for approval by the executive.	- Approve all contracts under £30k. - Approve all contracts up to £50k in agreement with RFD. - Recommend approval of all contracts of £50k+.	

Functional Area	Board	OAT National Leadership Group	Education Directors	Academy Principal	Local governing body (LGB)
IT	- Approve Trust wide IT strategy [Delegated to the Finance and Resources Committee] - Approve Trust wide IT policies.	- Set OAT IT policies. - Set the OAT's IT and digital strategy. - Set standardised solutions. - Set academies IT and Acceptable Use policy. - Lead on IT procurement. - Lead on contract management for overall IT service at Trust and academy level.	Support positive engagement with OAT IT Team so that academies and the OAT IT Team effectively and plan appropriately.	- Set IT and digital strategy (in line with Trust guidance). - Implement the Acceptable Use policy amongst pupils and staff. - Approve IT Project budgets. - Engage and approve decisions for IT Projects. - Ensure procurement aligns with OAT's IT Catalogue. - Inform filtering policy of what can and cannot be allowed in academy.	Informed of IT and digital strategy including capital investments.

Functional Area	Board	OAT National Leadership Group	Education Directors	Academy Principal	Local governing body (LGB)
Estates	- Accountable for meeting statutory requirements around Estates and Health and Safety (H&S) - Approve all relevant H&S policies.	- Responsible for meeting statutory requirements around health and safety (H&S). - Set OAT H&S policy. - Arrange H&S and fire risk audits. - Oversee all aspects of initial capital build inc. procurement, legal and project management. - Support academies in arranging contracts e.g., academy catering, M&E, energy. - Set OAT's capital strategy and SCA allocation.	- Review the academy's routine compliance audits and the implementation of action plans. - Input and sign off into long term strategic site/ capital priorities. - RFDs to work with Estates to realise regional procurement opportunities. - Work with regional estates team to propose capital expenditure plans to Executive.	- Ensure compliance with academy H&S policies and procedures. - Ensure that appropriate risk assessments are in place. - Engage in H&S and fire risk audits. - Ensure compliance with procurement and building maintenance regulations at academy level. - Engage in capital build projects as required.	- Informed of H&S arrangements - Monitor H&S incidents at academy. - Review audit (including fire safety) outcomes. - Informed of capital build project updates.

Functional Area	• Board	• OAT National Leadership Group	• Education Directors	Academy Principal	• Local governing body (LGB)
Estates (continued)		Set OAT 'green' strategy		- Determine and deliver ongoing maintenance and capital works strategy. - Set academy 'green' strategy.	

Functional Area	Board	OAT National Leadership Group	Education Directors	Academy Principal	Local governing body (LGB)
Projects*	- Approve the strategy for growth. - Sign off on approvals in line with OAT incorporation policy. - Accountable for signing new academy legal documentation.	- Responsibility for Trust growth. - Accountable for pre-opening financial approvals. - Approve pre-opening legal documentation. - Approve transition and new academy plans as part of Project Board (CFO to chair).	- Support with the development of regional pipelines. - Provide educational and leadership strategy for transition and new academies. - Approve transition and new academy plans as part of Project Board. - Provide coaching for incoming principals.	Informed of development of pipeline in academy's region (and Trust).	Informed of development of pipeline in academy's region (and Trust).

Functional Area	Board	OAT National Leadership Group	Education Directors	Academy Principal	Local governing body (LGB)
Monitoring & Reporting	Review Trust wide improvement plans	- Set OAT improvement planning templates. - Generate Trust wide heatmaps which show academy performance. - Set standards for academies in terms of their use of data to support decision making. - Maintain systems map and support academies in designing their approach to data. - Publish guidance and training materials on how to use data systems.	- Sign off academy Self Evaluation Forms (SEF) and Academy Improvement Plans (AIP). - Support and respond to central monitoring visits and lead regional peer reviews. - Support Principals preparing for Ofsted inspections & monitoring visits. - Ensure LGBs are prepared for involvement in Ofsted inspections. - Represent the Board in Ofsted inspection	- Develop Self Evaluation and Academy Improvement Plan - Provide regular analysis of academy performance data to the ED and LGB via the standard reporting template including the "Principal's report." - Ensure that any issues with data collection (as highlighted through annual audit) are actioned.	- Review academy performance data. - Informed of the outcomes of external monitoring. - Attending annual monitoring visit (Chair). - Receive monitoring visit reports when published (Chair) and placed on next LGB agenda. - Informed of any issues with data quality. - Undertake Ofsted training and attend inspection were

Functional Area	Board	OAT National Leadership Group	Education Directors	Academy Principal	Local governing body (LGB)
Monitoring & Reporting (continued)		- Support third party data integrations and procure data tools for use across the Trust. - Monitor quality of data through annual audit and share findings with RDs and Principals for action. - Conduct a Trust wide monitoring cycle and share feedback with board and central teams.	governance meetings. - Provide an annual overview of LGBs on academy performance. - Review safeguarding audits		possible (Chair and Safeguarding Link).

Functional Area	Board	OAT National Leadership Group	Education Directors	Academy Principal	Local governing body (LGB)
Governance & accountabilities	- Approve Scheme of Delegation, Terms of Reference, Risk Framework and Policy Framework. - Approve Whistleblowing policy. - Accountable for meeting statutory requirements around data protection and security. - Accountable for meeting statutory requirements for governance arrangements.	- Develop Scheme of Delegation, Terms of Reference, and Policy Framework. - Responsible for responding to whistleblowing disclosures. - Responsible for meeting statutory requirements around data protection and security. - Approve data protection policy. - Provide data protection guidelines and standards and oversee Trust-wide approach to data protection controls.	- Review the academy's routine compliance audits: website, data protection, safeguarding, SCR and pathways and enrichment. - Responsible for identifying regional risks arising from individual academy risk registers and reporting on them to OAT central. - Support Principals with preparation of academy Business Continuity Plans.	- Ensure required policies are in place and communicated to all staff according to the overall OAT approach. - Ensure the Whistleblowing policy is available to all staff and refer any disclosures to the OAT Executive in line with the policy. - Conduct routine annual audits (website, data protection safeguarding, SCR and pathways and enrichment).	- Review changes to relevant academy level policies, academy risk registers, and individual audit reports. - Review academy risks. - Informed of overall approach to Data Protection and security. - Informed of data breaches and status of Subject Access Requests. - Review academy Business Continuity Plan.

Functional Area	Board	OAT National Leadership Group	Education Directors	Academy Principal	Local governing body (LGB)
Governance & accountabilities (continued)		- Lead response in event of data breach. - Develop Risk Framework/register. - Responsible for oversight and review of academy risk registers - Accountable for meeting statutory requirements of governance arrangements. - Responsible for Business Continuity Plan. - Accountable for oversight of academy Business Continuity Plans.		- Responsible for individual academy risk register and provide timely information to OAT central on status of risks and controls. - Ensure academy meets and implements data protection requirements and standards at academy level in line with overall OAT approach. - Develop academy Business Continuity Plan.	