



Scheme of Delegation

October 2021

Trust Mission

'Inspiring learners'

Inspiring a community of learners and leaders, to achieve excellence,
with children at the heart of everything we do.

Passion – *passionate about learning*

Ambition – *ambitious for everyone to grow*

Collaboration – *working together, supporting each other*

Innovation – *imagining possibilities, challenging ideas*

Integrity – *open and authentic*

Our core values define who we are, how we work and what we strive to achieve

This Scheme:

- sets out our Trust's approach to delegations between the different layers of governance within the Trust and is a delegation by the Trustees under Article 105 of the Articles of Associations of certain powers and/or functions as detailed below;
- confirms which powers and functions are reserved to the Trustees;
- should be read in conjunction with the Trust's Committee Terms of Reference;
- may only be altered or revoked by the Trustees.

Our Trust's Scheme of Financial Delegation, which we are required to have under the Schools Financial Handbook, is set out in a separate document and also supplements this Scheme in respect of the delegation of financial powers and the operation of robust internal controls.

The Scheme is divided into four sections as follows:

- **Strategy & Leadership;**
- **Education & Curriculum;**
- **Financial & Operations;**
- **HR.**

To assist interpretation of the matters delegated in the Scheme we have used defined phrases which are supplemented by additional comment as appropriate.

The defined phrases should be given their common meaning but for the avoidance of doubt an explanation can be found on the final page of this scheme.

In our Trust the following roles are within our Executive Team Structure and referred to in this document:

- **Head of Trust (HoT)** - this is the CEO
- **Trust Finance Director (TFD)** - this is the CFO
- **Head of School (HoS)**

In this Scheme the phrases used above have the following meanings:

COMPLY: the individual/group will follow agreed policies and procedures.

CONSULT: the individual/group that should be consulted as part of the process of completing a particular task.

DELIVER: the individual/group that has responsibility for undertaking the particular task delegated to them and reporting on its delivery at suitable intervals. In the case of the Head of Trust this will be at Trust level. In the case of the Heads of School this will be at School level.

DETERMINE: the individual/group that has primary responsibility for ensuring the particular task is completed and determining how the Trust and/or Schools (as appropriate) should undertake the task including determining appropriate milestones and targets to be reported against.

DEVELOP: the individual/group that has responsibility for developing proposals relating to a task for discussion and approval by the appropriate decision-making individual/group.

RECOMMEND: the individual/group that should make recommendations as to how a particular task should be completed. In the case of:

- *the Head of Trust will be making recommendations to the Board and/or LGB (as appropriate)*
- *the LGB will be making recommendations in relation to their School to the Board, Head of Trust and/or Head of School (as appropriate)*
- *the Head of School will be making recommendations in relation to their School to the Head of Trust and/or LGB (as appropriate)*

REPORT: the individual/group that has responsibility for reporting on the delivery of tasks. In the case of:

- *the Head of Trust will be making reports to the Board and/or LGB (as appropriate)*
- *the LGB will be making reports in relation to their School to the Board and/or Head of Trust (as appropriate)*
- *the Head of School will be making reports in relation to their School to the Head of Trust and/or LGB (as appropriate).*

REVIEW: the individual/group that has responsibility for reviewing whether a particular task is being carried out satisfactorily and where appropriate requiring action to be taken to ensure task is delivered appropriately. In the case of:

- *the Board they will be reviewing the Head of Trust and LGB (as appropriate)*
- *the Head of Trust will be reviewing the Head of School*
- *the LGB will be reviewing the Head of School and his/her leadership team.*

SUPPORT: the individual/group that should support completing a particular task.

STRATEGY AND LEADERSHIP

		Trust Board (Board)	Head of Trust (HoT)	Local Governing Body (LGB)	Head of School (HoS)
1.01a	Set strategic objectives of the Trust	DEVELOP DETERMINE	DEVELOP	CONSULT	CONSULT
1.01b	Set strategic objectives of the School	CONSULT DETERMINE - to be in line with strategic objectives of the Trust	CONSULT	DEVELOP	DEVELOP
1.02a	Develop the character, mission & ethos of the Trust	DEVELOP DETERMINE	DEVELOP	CONSULT	CONSULT
1.02b	Develop the character, mission & ethos of the School	CONSULT DETERMINE - to be in line with the character, mission & ethos of the Trust	CONSULT	DEVELOP	DEVELOP
1.03a	Deliver strategic objectives of the Trust	REVIEW	DELIVER	REVIEW	DELIVER
1.03b	Deliver strategic objectives of the School	REVIEW	DELIVER	REVIEW	DELIVER
1.04	Scrutiny: Performance – review & challenge progress of the Trust against its strategic objectives and KPIs	REVIEW – progress of the Trust & Schools	REVIEW - reports from the LGBs & HoS REPORT – progress to the Board	REVIEW – Performance of School against SDP REPORT – Themes to the HoT	REPORT – progress of the School to the LGB & HoT
1.05	Scrutiny: Ethos – operation of the Trust & Schools against the agreed character, mission & ethos	REVIEW – progress of the Trust & Schools	REVIEW - reports from the LGBs & HoS REPORT – progress to the Board	REVIEW – Themes of the School REPORT – progress to the HoT	REPORT – progress of the School to the LGB, HoT and Board

STRATEGY AND LEADERSHIP

		Trust Board (Board)	Head of Trust (HoT)	Local Governing Body (LGB)	Head of School (HoS)
1.06	Compliance: Funding Agreement – comply with all obligations including the Schools Financial Handbook	REVIEW	DELIVER REPORT – progress to the Board	COMPLY	COMPLY REPORT – progress to HoT
1.07	Compliance: Regulatory – with all regulations affecting the Trust (including all charity law, company law, employment law and health and safety)	REVIEW	DELIVER REPORT – progress to the Board	COMPLY	COMPLY REPORT – to LGB & HoT
1.08	Compliance: Financial Oversight - ensuring that there are appropriate financial controls so that there is regularity, probity and value for money in relation to the management of public funds	DETERMINE – policies to ensure compliance REVIEW	DELIVER REPORT – progress to the Board	COMPLY	COMPLY REPORT – to LGB & HoT
1.09	Compliance – completing the register of business interests and put in place a procedure to deal with any conflicts of interest and connected party transactions	DETERMINE – policies to ensure compliance DELIVER	DELIVER	DELIVER	
1.10	Trust Risk Register	DETERMINE REVIEW	DELIVER – management of Trust risk register	REVIEW - School risk register	DELIVER – management of School risk register
1.11	Appointments of Trustees and Governors – ensuring processes in place for appointment of trustees (including ensuring that the Trustees and Governors have the skills to run the Trust and the Schools) (Members to review appointment and performance of Trustees)	DETERMINE – policies and criteria for the selection of trustees and governors DETERMINE – the selection of trustees and governors REVIEW – the Board’s own performance and performance of the LGBs	REPORT - to the board on the performance of the LGBs REVIEW - annually the size, structure and composition and skill determines of LGBs RECOMMEND – to Board appropriate changes to the size and composition of LGBs	CONSULT – governors about trust policies/criteria for the selection RECOMMEND – new governors, for the LGB, to the Board. REVIEW – own performance	

STRATEGY AND LEADERSHIP

		Trust Board (Board)	Head of Trust (HoT)	Local Governing Body (LGB)	Head of School (HoS)
1.12	Register of Interests	DELIVER		DELIVER	
1.13	Appointment of Clerk – Board and LGBs	DELIVER - appoint the clerk to the Board & LGBs		CONSULT – in connection with the appointment of the LGB clerk	
1.14	Policies – review and approval of Trust Wide Policies (including admissions, DBS, charging and remissions policies, health & safety and safeguarding) and other Template Policies to support individual Schools	DETERMINE	DELIVER – presenting policies to the Board for approval REPORT – compliance/non-compliance to the Board	ADOPT REVIEW – all policies approved by the Board and School specific policies	DELIVER – presenting School specific policies for approval by the LGB REPORT – non-compliance to the LGB and the HoT
1.15	Prepare terms of reference for LGB’s and Committees	DETERMINE REVIEW - annually	DEVELOP	DEVELOP ADOPT	DEVELOP
1.16	Training programme for trustees and governors	DELIVER	DEVELOP	DELIVER	CONSULT
1.17	Strategic leadership and governance during Covid-19	DETERMINE	DEVELOP COMPLY	COMPLY	COMPLY

EDUCATION AND CURRICULUM

		Trust Board (Board)	Head of Trust (HoT)	Local Governing Body (LGB)	Head of School (HoS)
2.01	School Development Plan - for each School in line with strategic aims of the Trust	DETERMINE - the School development plan in consultation with the appropriate LGB, HoS and HoT	DELIVER – drafting and agreeing the School development plan , with HoS	RECOMMEND – School Development Plan to the Board REVIEW	DELIVER – drafting and agreeing the School Development Plan, with HoT REVIEW – the School Development Plan
2.02a	Key Performance Indicators – setting and reviewing performance of the Trust	DETERMINE REVIEW	DEVELOP DELIVER	CONSULT	CONSULT
2.02b	Key Performance Indicators – setting and reviewing performance of the School	CONSULT DETERMINE - to be in line with the KPIs of the Trust REVIEW – performance against KPIs and against Ofsted criteria	CONSULT RECEIVE REPORTS - from the LGBs and report performance of the LGBs against School KPIs	RECOMMEND – targets for performance of the School to the HoT REVIEW – performance of the School against SDP and report to the HoT DELIVER - holding leadership to account for delivery against KPIs in SDP	DELIVER – performance of the School against KPIs REPORT – performance of the School to LGB, HoT and Board
2.03	Quality of Teaching - ensuring appropriate levels of support, challenge and intervention to support delivery of education outcomes	REVIEW - the work of the HoT	DELIVER - supporting the Schools and intervening where appropriate REPORT – to Board	REVIEW - at the School	REVIEW – management of staff to ensure teaching and learning objectives are met REPORT - strengths and concerns in the quality of teaching to LGB
2.04	Curriculum – setting the curriculum for the Schools and reviewing its effectiveness	REVIEW – effectiveness of the curriculum across Trust	REVIEW	DETERMINE - curriculum and standards REVIEW	DETERMINE - curriculum and standards DELIVER
2.05	Curriculum - ensuring that the legal requirements for children with special needs are met and that they are given support for learning.	REVIEW – effectiveness of the curriculum across Trust	REVIEW – effectiveness of the curriculum across Trust	REVIEW – effectiveness of the curriculum across Trust	DELIVER

EDUCATION AND CURRICULUM

		Trust Board (Board)	Head of Trust (HoT)	Local Governing Body (LGB)	Head of School (HoS)
2.06	Pupil Premium – reviewing and challenging the value for money/ ROI of the Pupil Premium in terms of educational outcomes and narrowing the achievement gap	REVIEW	REPORT – to board effectiveness of use of the pupil premium across the Trust	DETERMINE REVIEW – how pupil premium is spent at the School	DELIVER REPORT – on effectiveness of use of the pupil premium
2.07	Collective worship arrangements for school without religious character			DETERMINE REVIEW	DELIVER
2.08	Set Admissions Policy	DETERMINE DELIVER	DEVELOP	CONSULT	CONSULT
2.09	Admission decisions			DELIVER	CONSULT
2.10	<p>Review – considering and evaluating performance of the Schools by:</p> <ul style="list-style-type: none"> * reviewing progress against agreed KPIs * holding each School’s leadership to account for academic performance, quality of care and quality of provision * monitoring the overall effectiveness and efficiency of leadership and management at the Schools * receiving reports on the quality of teaching and learning and making recommendations to the Board. 	REVIEW – a School’s overall performance	<p>REVIEW</p> <p>REPORT – to the Board</p>	<p>DELIVER - against SDP priorities</p> <p>REVIEW - against SDP priorities</p>	<p>DELIVER</p> <p>REVIEW</p> <p>REPORT – to LGB and HoT for SDP performance, and to HoT and Board for overall performance</p>

EDUCATION AND CURRICULUM

		Trust Board (Board)	Head of Trust (HoT)	Local Governing Body (LGB)	Head of School (HoS)
2.11	Self-evaluation – carrying out the self-evaluation process and the areas for improvement with particular regard to outcomes and success criteria.	REVIEW - overall School performance	REVIEW - progress against SDP priorities and overall performance REPORT – progress to the Board	REVIEW - progress against SDP priorities	DELIVER REPORT – progress to the LGB, HoT and Board
2.12	Review priorities - considering the aims and priorities for raising standards of achievement in each of the Schools’ strategic plans.	REVIEW	REVIEW REPORT – progress to the Board	REVIEW	DELIVER REPORT – to the LGB and HoT
2.13	Pupil issues (including attendance, exclusions, punctuality and disciplinary matters for each School)	REVIEW – overall performance	REVIEW – delivery REPORT – progress to the Board	DETERMINE - policies DELIVER – receive reports from the HoS REPORT – any issues to the Board and the HoT	DELIVER – ensuring pupil issues are dealt with in accordance with trust and School policies REPORT – to the LGB on any material issues
2.14	School Hours – setting the opening and closing times for the Schools	DETERMINE – in consultation with LGBs		CONSULT – with the Board	CONSULT – with the Board COMPLY
2.15	Term Dates and length of school day	DETERMINE – in consultation with LGBs	DELIVER	CONSULT – with the Board	CONSULT – with the Board COMPLY
2.16	School lunch – ensure provided to appropriate nutritional standards			REVIEW	DELIVER

EDUCATION AND CURRICULUM

		Trust Board (Board)	Head of Trust (HoT)	Local Governing Body (LGB)	Head of School (HoS)
2.17	Provision of free school meals to those meeting criteria			REVIEW	DELIVER
2.18	Safeguarding – including ensuring each School has appointed a Designated Safeguarding Lead, ensuring compliance with statutory guidance and maintenance of single central record.	REVIEW	REVIEW	DELIVER	DELIVER
2.19	<p>Stakeholder Engagement –</p> <p>* promoting partnership working between parents/carers and the Schools to promote high standards of attendance, behaviour and learning by pupils.</p> <p>* undertaking consultation with pupils, parents/carers and other stakeholders as part of a programme of regular self-evaluation by the Schools to assess its performance against its stated aims and objectives.</p> <p>* ensuring that such feedback is used to support the development of best practice and to promote the quality of the overall pupil experience.</p>	REVIEW	CONSULT	DETERMINE	DETERMINE DELIVER

EDUCATION AND CURRICULUM

		Trust Board (Board)	Head of Trust (HoT)	Local Governing Body (LGB)	Head of School (HoS)
2.20	<p>Ofsted Inspections Support Across the Trust –</p> <ul style="list-style-type: none"> ▪ Board will liaise with Ofsted where MAT is inspected and it will assist with a School inspection. ▪ HoT will ensure Trust is prepared for inspection and manage the process from a Trust perspective where the impact of the Trust is under review ▪ HoT will support LGBs and HoSs for individual School inspections 	<p>SUPPORT – School inspections DELIVER – Trust inspections</p>	<p>DELIVER – Trust and School inspections</p>	<p>SUPPORT – Trust inspections DELIVER – School inspections</p>	<p>SUPPORT – Trust inspections DELIVER – School inspections</p>

FINANCIAL AND OPERATIONS

		Trust Board (Board)	Head of Trust (HoT)	Local Governing Body (LGB)	Head of School (HoS)
3.01	Appointment of the Audit & Risk Committee	DELIVER			
3.02	Appointment of the Accounting Officer & Chief Financial Officer	DELIVER	DELIVER – the accounting officer role		
3.03	Recommend appointment of External Auditors to the Members	DELIVER			
3.04	Appointment of the Internal Auditors	DELIVER			
3.05a	Key Performance Indicators – setting and reviewing performance of the Trust	DETERMINE REVIEW	DEVELOP DELIVER	CONSULT	CONSULT
3.05b	Key Performance Indicators – setting and reviewing performance of the School	CONSULT DETERMINE - to be in line with the KPIs of the Trust REVIEW – performance against KPIs	CONSULT RECEIVE REPORTS - from the LGBs and report performance of the LGBs against School KPIs	RECOMMEND – targets for performance of the School to the HoT REVIEW – performance of the School and report to the HoT DELIVER - holding leadership to account for delivery against KPIs	DELIVER – performance of the School against KPIs REPORT – performance of the School to LGB and HoT
3.06	Approve Annual Accounts	APPROVE	DELIVER – arrange for auditing and filing of annual report and accounts	COMPLY – by ensuring School keeps proper records and providing such information to assist the trust in preparation of the annual accounts	

FINANCIAL AND OPERATIONS

		Trust Board (Board)	Head of Trust (HoT)	Local Governing Body (LGB)	Head of School (HoS)
3.07	Scheme of Financial Delegation & Financial Policies –establishing of policies and procedures to ensure compliance with the Trust’s financial and reporting requirements	DETERMINE COMPLY	REVIEW – compliance REPORT – any issues or non-compliance to the Board COMPLY	REVIEW - compliance by the School REPORT – any issues or non-compliance to the HoT COMPLY	COMPLY
3.08	Bank Accounts – authorising the establishment of bank accounts and approve bank mandates in the name of the Trust	DETERMINE	RECOMMEND		
3.09	Funding Model - agreeing a funding model across the Trust and develop an individual funding model for the Schools) so as to the secure the Trust’s financial health in the short term and the long term	DETERMINE – in consultation with the LGBs REVIEW	RECOMMEND - a funding model to the Board for approval REPORT	CONSULT – with the Board REVIEW - compliance with the overall financial plan for the School	COMPLY
3.10	Trust Annual Budget – formulating and setting the Trust wide budget	DETERMINE APPROVE	DELIVER - preparation of trust budget and present to the Board for approval REVIEW – submission of trust budget to the ESFA		
3.11	School Annual Budgets – formulating and determining the proportion of the overall budget to be delegated to each School (including uses of contingency funds/ balances)	DETERMINE APPROVE	DELIVER - preparation of School budgets in consultation with the LGBs and present to the Board for approval REVIEW – submission of School budgets to the EFSA	CONSULT - with HoT & TFD in respect of the School’s requirements COMPLY APPROVE - within permitted limits (as defined in the scheme of financial delegation) any variances REVIEW	CONSULT DELIVER – in consultation with CFO COMPLY

FINANCIAL AND OPERATIONS

		Trust Board (Board)	Head of Trust (HoT)	Local Governing Body (LGB)	Head of School (HoS)
3.12	Expenditure and ensuring delivery of Annual Budgets	REVIEW	REPORT – to the Board any material issues with delivery against the annual budget by the Schools RECEIVE REPORTS – on matters of concern in connection with compliance with the annual budgets	REVIEW REPORT - to the HoT any issues with expenditure or compliance with the annual budgets by the School	REPORT – to the LGB any need for any matters of concern in respect of the School’s annual budget
3.13	Expenditure and ensuring delivery of Annual Budgets	REVIEW	REPORT – to the Board any material issues with delivery against the annual budget by the Schools RECEIVE REPORTS – on matters of concern in connection with compliance with the annual budgets	REVIEW REPORT - to the HoT any issues with expenditure or compliance with the annual budgets by the School	REPORT – to the LGB any need for any matters of concern in respect of the School’s annual budget
3.14	Reporting: financial reporting and KPIs	DETERMINE REVIEW	DELIVER REPORT – to the Board	REVIEW	DELIVER REPORT – to LGB and HoT
3.15	Investments – agreeing the investment policy in line with the Schools Financial Handbook and the Scheme of Financial Delegation	DETERMINE REVIEW	DELIVER		
3.16	Setting School specific procurement policies - in accordance with the Funding Agreement, Schools Financial Handbook and the Trust’s procurement policy	DETERMINE REVIEW	RECOMMEND REPORT REVIEW	COMPLY	COMPLY

FINANCIAL AND OPERATIONS

		Trust Board (Board)	Head of Trust (HoT)	Local Governing Body (LGB)	Head of School (HoS)
3.17	Enter into contracts – up to limit of delegation set out in Scheme of Financial Delegation	DELIVER	DELIVER	COMPLY	COMPLY
3.18	Determining and allocating central services provided to the Schools by the Trust	DETERMINE (in consultation with the LGBs)	DELIVER – on recommending the allocation of services to the Board	CONSULT	CONSULT
3.19	Overseeing the effectiveness of services provided centrally by the Trust	REVIEW	DELIVER REPORT - to Board	REPORT – to the Board	REPORT – to the Board
3.20	Asset and Premises Maintenance Strategy – determining use of Schools’ premises and ensuring premises are adequately maintained	DETERMINE – trust wide policy	RECOMMEND	DETERMINE – School plan in accordance with trust policy REVIEW - delivery of School plan	DELIVER – in accordance with School policy
3.21	Acquiring and disposing of Trust land	DELIVER	RECOMMEND	CONSULT	CONSULT
3.22	Changing use of Assets	DELIVER	RECOMMEND	CONSULT	CONSULT
3.23	Arranging insurance for the Trust	REVIEW DETERMINE	DELIVER		

HR

		Trust Board (Board)	Head of Trust (HoT)	Local Governing Body (LGB)	Head of School (HoS)
4.01	Appointing the HoT	DETERMINE		CONSULT	CONSULT
4.02a	Determine the appointment process for the Head of School at each School	DETERMINE -in consultation with the HoT/LGBs	RECOMMEND	RECOMMEND	
4.02b	Appointing the Head of School at each School	DETERMINE -in consultation with the HoT/LGBs	RECOMMEND – sit on appointment panel along with, trustee & [two] representatives of the relevant LGB	RECOMMEND – [two representatives] to sit on the appointment panel with the HoT & a trustee	
4.03	Appointing of cross-Trust Staff (in line with recruitment policy)	APPOINT	RECOMMEND - sit on appointment panel	RECOMMEND	RECOMMEND – At least one HT to sit on appointment panel
4.04	Appointing School SLT (excluding Head of School)		CONSULT	DELIVER - report to Board REPORT – to HoT and Board	RECOMMEND
4.05	Appointing School Staff (excluding SLT & Head of School)			DELIVER	RECOMMEND
4.06a	Key Performance Indicators – setting and reviewing performance of the Trust	DETERMINE REVIEW	DEVELOP DELIVER	CONSULT	CONSULT
4.06b	Key Performance Indicators – setting and reviewing performance of the School	CONSULT DETERMINE - to be in line with the KPIs of the Trust REVIEW – performance against KPIs	CONSULT RECEIVE REPORTS - from the LGBs and report performance of the LGBs against School KPIs	RECOMMEND – targets for performance of the School to the HoT REVIEW – performance of the School and report to the HoT DELIVER - holding leadership to account for delivery against KPIs	DELIVER – performance of the School against KPIs REPORT – performance of the School to LGB

HR AND OPERATIONS

		Trust Board (Board)	Head of Trust (HoT)	Local Governing Body (LGB)	Head of School (HoS)
4.07	Establishing Trust wide HR Policies (including recruitment, discipline, capability, grievance and absence policies) in accordance with all appropriate regulations	DETERMINE REVIEW	RECOMMEND COMPLY	COMPLY	COMPLY
4.08	Implement Appraisal Performance Management Policy together with pay reviews (in line with the Trust's pay policy and all statutory regulations)	REVIEW – in respect of HoT RECEIVE REPORTS – in respect of appraisal arrangements and outcomes REVIEW – any appeals in respect of the principals and cross School staff	REVIEW – in respect of HoS and cross trust staff (and any appeals from School staff) REVIEW - AND REPORT – (annually) to the Board on appraisal arrangements and outcomes	COMPLY – in respect of performance management of HoS REVIEW – any appeals respect of all other staff	COMPLY REVIEW – in respect of all other staff REPORT – annually to the HoT on appraisal arrangements and outcomes
4.09	Setting Terms and Conditions of Employment and Staff Handbook	DETERMINE – and consider any proposals by LGBs to make amendments	RECOMMEND	CONSULT - report to Board on any suggested changes to the School's terms and conditions COMPLY	CONSULT COMPLY
4.10	Dismissing HoT, HoSs / senior/ cross Trust staff (in accordance with the Trust disciplinary and capability policies)	REVIEW – in respect of the HoT DETERMINE -in consultation with the HoT/LGBs	REVIEW – in respect of principals, cross School staff and senior leadership teams of the Schools REPORT – any dismissals to the Board	CONSULT - report to Board REVIEW – in respect of the HoS of the School	
4.11	Dismissing all other staff (in accordance with the Trust disciplinary and capability policies)		REVIEW REPORT – to the Board	REVIEW (in consultation with the CEO) REPORT – to the HoT	COMPLY

HR AND OPERATIONS

		Trust Board (Board)	Head of Trust (HoT)	Local Governing Body (LGB)	Head of School (HoS)
4.12	Media and PR - overseeing public relations activities to project the activities of the Trust and the Schools to the wider community	REVIEW	DELIVER – trust wide activities	COMPLY	COMPLY
4.13	Information management – including adopting and following policies for information security and compliance with FoI and DPA legislation and maintaining accurate records (staff, pupil)	DETERMINE REVIEW	DELIVER REPORT – to the Board	COMPLY REVIEW	COMPLY REVIEW
4.14	School Prospectus & Website	REVIEW	REVIEW	REVIEW	DELIVER
4.15	Trust Prospectus and website	REVIEW	DELIVER		

