

Internal review of Governance

December 2025



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Overview and summary of the review outcomes

This report sets out the conclusions that have emerged from the review, identifying strengths of governance at the trust and recommended areas for consideration or action.

The review identified several strengths, including:

- the Trust Board, although containing several relatively new Trustees, is a strong and effective Board that operates in an open and transparent way, offering appropriate challenge and support to the senior leadership team.
- open and effective working relationships between trustees and the senior leadership team.
- a strong commitment to doing the very best for young people.
- a committee structure that provides effective oversight of key aspects.
- meetings are well organised and effective.
- strong effective internal controls are in place.

The review also identified a number of recommended areas for development for the trust board to consider:

- re-consider the function and remit of the local tier of governance.
- review the two-way communications between the local tier of governance and the board.
- re-consider GR/GR+ approach to better serve a group of 40+ schools.

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Scope

The review used lines of enquiry intended to provide an overview of the effectiveness of Trust governance. Underpinning the focus areas are the [Trust Quality Descriptors](#), and the [Academy Trust Handbook](#). The review also notes the relevance of aspects of the [Academy Trust Governance Code](#), whilst recognising that this is not statutory. The lines of enquiry used to evaluate governance come under the headings on the contents page.

The review process

The review was led by Katie Stobbart, Head of Legal and Governance at TEFAT. Katie was appointed in late August 2025 and was tasked with completing the review in lieu of an external review, given she was new to the Trust (therefore offering an independent view) and has significant experience in trust governance spanning 15+ years.

The outcome report is also based on:

- A review of key governance documentation
- A review of the trust and academy websites

The review also based on one-to-one discussions with key stakeholders including:

- Five trustees
- 16 community councillors
- Chief Executive Officer
- Regional Directors (inc Trust safeguarding lead)
- Principals x 21
- Louise Daniel (Community Council Coordinator)
- Chair of Audit and Risk Committee
- Members x 2
- Observation of two full trust board meetings
- Observation of one audit and risk committee
- Observation of one finance committee
- Observation of one academic board meeting
- Observation at all 36 academy governance review meetings
- Analysis of most recent stakeholder surveys
- Previous Director of Governance (resigned April 2025) - Jem Shuttleworth

TEFAT background information and context

The Elliot Foundation Academies Trust (TEFAT) is a charitable multi-academy trust specialising in primary academies. They educate 15,000+ children in 36 schools across three different regions; the West Midlands, East Anglia and London. Their Head Office is in London.

Board leadership

Purpose and direction

- 1.1. Members adopted new articles of association in 2025. Members and trustees have a good understanding of their charitable purpose.
- 1.2. The incumbent Chair took office in October 2025 and is effective, taking care to ensure that colleagues remain focused on the strategic consideration rather than operational implications. Their tenure is intended to be short-term, serving until a long-term candidate can be successfully identified and appointed.
- 1.3. The trust board sets the strategic direction and has a strategic plan spanning 2020-27. The chief executive officer (CEO) is responsible for proposing the strategy and for delivering it as agreed by the Board. The plan was reviewed in February 2025. Reporting to the Board might be reviewed to ensure alignment to the strands of the strategic plan. (*recommendation*)
- 1.4. Schools within the MATs are in three coherent geographical clusters with a shared sense of community, ethos and values.
- 1.5. TEFAT has 12 trustees, placing it within the usual number for a Trust of its size, which usually range from 6 – 13, with the average and mode being 10. Under article 57 of the Trust articles of association, the Members have appointed the CEO as a trustee.
- 1.6. Committee membership is appropriate for scrutiny and decision making and to balance the workload of trustees.
- 1.7. Much of the scrutiny of education outcomes of individual schools is delegated to the Operations Group, which delivers this via the line management relationship between regional directors and schools, and the GR/GR+ programme. Although largely effective, this is currently at capacity and is unlikely to be sustainable beyond the current size of the trust.
- 1.8. The trust board manages the conflict between short-term interests and a long-term orientation, well.
- 1.9. Trustees have articulated their view of growth, aiming to reach 40 schools by 2027. Long serving trustees are clear on the guiding principles for schools joining the trust and due-diligence is robust. New trustees would benefit from further input on this process. They understand the importance of contributing to the wider system.

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- 1.10. Trustees and senior employees have a strong working relationship, one of mutual respect and trust, but where challenge is expected and encouraged. Senior colleagues respond well to such challenge and use it to inform their own responses to key matters.
- 1.11. The process for schools joining the Trust is captured on the website. This ensures that any new schools understand and subscribe to the same values, and that embedding them can, and will, support their existing practice.

Culture and values

- 1.12. There is effective governance practice on which to commend the trust board. Particular strengths include the skills and knowledge of trustees, the expertise of the Operations Group, and the Trust board committees, with transparent communication and an openness to challenge.
- 1.13. The Trust Board has established a strong culture with the CEO, with a vision, mission and values that are clear and unambiguous. These values are embedded within the work of the Trust Board and its committees.
- 1.14. This is a values-led organisation in which Trustees are clear in their focus on ensuring the best possible education for children. This is at the core of their mission, vision, and values.
- 1.15. The trust board and senior staff have developed a defined working relationship over time where challenge is encouraged. The Trust board has encouraged the recruitment of trustees with varied backgrounds and expertise to ensure a broad range of views are represented.
- 1.16. The trust board governs with integrity, commitment, and compassion. Member, trustee, and local councillor behaviours align with the values of the trust and the Nolan principles of public life. In recent surveys, 92% employees agreed that people of all cultures and backgrounds are respected at the Trust.
- 1.17. There is a clearly defined vision and values. Whilst the values are embedded and lived, and they are consistently understood throughout the organisation, the vision was less able to be articulated. Trustees are focussed on the benefit of every decision and the positive impact this has on children.
- 1.18. From members through to community councillors, this is a values-led organisation in which people are focussed on ensuring the best possible education for children. This is at the core of their mission, vision, and values. In all meetings observed and in the

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scrutiny of the minutes there were excellent questions and comments – they have a clear interest in the work the trust is doing and demonstrate a determination to drive forward the vision of the Trust. People are overwhelmingly proud to be associated with the Trust.

- 1.19. The board approves new Trust-wide policies but could more systematically monitor their effectiveness. The board could seek assurance from the ACCs that the Trust's purpose and values are embedded in all operational policies and practices. Policies, whilst approved, do not currently have an assessment of impact. (*recommendation*)
- 1.20. The trust strategic plan is linked to the vision and values. It might be helpful to link the regular Trust surveys to the plan, so that an assessment can be made on stakeholder perception of its success. (*recommendation*)
- 1.21. There is a culture of knowledge-based challenge, and in meetings observed, professional behaviours were modelled.

People and workforce: being a good employer

- 1.22. Recruitment and retention is a priority and this is reflected in an early stage draft plan led by the Director of HR. Trustees have asked for regular reporting directly to the Board on the key performance indicators, and are appropriately focussed on their role in measuring impact. There is a strong commitment from trustees to make the trust a great place to work through excellent ongoing CPD and internal promotion opportunities.
- 1.23. The trust values are not currently embedded in the performance management process and this is something that could be considered going forwards. (*recommendation*)

Making good decisions

- 1.24. Senior leaders have felt well supported in decision making, particularly by the Trust Board. The chair is readily available for discussions and communication outside of formal meetings.
- 1.25. Trustees are highly skilled, contributing significant professional expertise to ensure strong collective decisions. While the Board has historically provided what could be considered a high level of support not challenge, this approach has coincided with, and arguably contributed to, several years of excellent overall progress. Trustees express a willingness to offer challenge, when appropriate.
- 1.26. Governance commitment is strong, and attendance is good; attendance is reported on the website.

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- 1.27. There is a sound understanding of the risk of conflicts of interest. This is an item on every meeting agenda, with evidence of updates being made at recent meetings. Trustee interests are up-to-date and published on the Trust website.
- 1.28. Although a skills audit was undertaken in 2023, there is little evidence of training or development being offered or completed as a result. There is currently a self-evaluation analysis underway and this should inform the ongoing bespoke training offer for members and trustees. (*recommendation*)
- 1.29. Business is carried out in the board and committee meetings in an open and transparent way.
- 1.30. The Trust encourages engagement with communities through their ACC model. Community councils are advisory bodies, and are a formal part of the Trust's governance structure in line with its Articles of Association.
- 1.31. Trustees are clear that its main focus is on strategy, performance, and assurance, rather than operational matters, and reflects this in what it delegates to its committees, and ACCs.
- 1.32. All meetings were well planned with carefully set out agendas. There is a process for agreeing board and committee agendas and papers between the chair and the relevant member of the operations group.
- 1.33. Papers are generally made available in time to enable trustees to have sufficient reading and preparation time. The agendas helpfully indicate who is leading on the item, indicate the purpose of the agenda item and give an indication of the time allocation for each item.
- 1.34. The board and committees have a balance of in-person and on-line meetings. The meetings observed were well chaired and effective, with robust questioning and open and honest responses.

The civic role of trusts and community anchoring

- 1.35. TEFAT states a desire in its strategic plan "We need to foster trust and openness with all our parent communities so that they believe we exist for their benefit." The Trust is aiming for strong and meaningful engagement with communities through its ACC model and via termly parental surveys. It is increasingly important that trusts have a strong approach to community and stakeholder involvement that includes but goes beyond consultation. The ACC terms of reference could perhaps be reviewed to ensure that responsibility for reviewing and considering improvements to schools vis-a-vis the parental surveys is taken by the ACCs, with support from the Trust Board. (*recommendation*)

Structure

There are currently 5 Members, one being The Elliot Foundation. There is no crossover on roles between the Members and Trustees.

There are currently 12 trustees.

The board has only three committees, Finance, Audit and Risk, and Pay. They have clear terms of reference and are highly effective.

The different parts of governance in the trust have distinct responsibilities., but there could be a closer relationship between the trust board and the ACCs.

Significant separation

- 2.1. There is significant separation between trustees and members. There are currently five Members, four of whom are individuals not appointed as trustees, with the fifth being The Elliot Foundation. This is in line with the DfE preference. The trust board chair is not a member.
- 2.2. The Members are aware of their role and recognise that their role relates to overseeing the effectiveness of the trust board. The trust complies with the statutory requirements regarding the Annual General Meeting and receiving the trust's audited annual report and accounts. The trust board is eager to make the AGM a more accessible opportunity for all stakeholders to engage with the Trust and its work. They might want to seek best practice from other national MATs in this regard. (*recommendation*)
- 2.3. There are 12 trustees, none of whom are local councillors. There is a balance of challenge and support. The sponsor has appointed six trustees, from a possible total of 8. Of the remaining 6 trustees in post, one is the CEO (appointed by Members in line with the AoA) and the remaining five have been co-opted by existing trustees.
- 2.4. The membership of Trust committees is in line with the requirement of the ATH that the majority of members must be trustees. The Chair of the Audit and Risk Committee is not the Chair of the Board of Trustees. Although there is no explicit ban on the Chair of the Finance Committee also being the Chair of the Board of Trustees, this is probably something that the Trust should aim to move away from as it is not best practice. There is an acknowledgement that this is a short-term measure until a Trust Board Chair designate is identified. (*recommendation*)
- 2.5. The AGM is attended by Trustees and Members, with the agenda taking the form of a standard Board meeting, with the addition of the approval of the year-end financial

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accounts. The agenda could be repurposed to better reflect the additional role of the Members to hold the Trust Board to account. This could involve a report on how trust objects have been met (education outcomes, financial performance, context) and a report on governance arrangements and effectiveness. The Trust Board Chair currently chairs the AGM, whereas it should be Members who take the lead. Currently, the Trust Board also approves AGM minutes, whereas this is a role for the Members at their next AGM. (*recommendation*)

- 2.6. Board Committees have clear terms of reference and delegated functions in the SoD.
- 2.7. The Chair creates the conditions for board effectiveness. The board are professional, confident, and well informed (the induction of new trustees notwithstanding). Boundaries between operation and strategic matters are well observed. There is a professional relationship between the chair and the CEO. There is clear separation of executive and governance duties. The CEO ensures high quality board reporting.

Division of responsibilities

- 2.8 Trustees spoken to are unanimous that the Chair and Governance Professional are pivotal in creating the conditions for overall board effectiveness, setting clear expectations concerning the style and tone of board discussions, ensuring the board has effective decision-making processes and that the board holds the executive to account.
- 2.9 The chair holds responsibility for developing a close and productive relationship with the CEO.
- 2.10 Executive leaders make use of the professional expertise of trustees to support strategy development. One trustee facilitates a 'Learning and Development' group, utilising skills and knowledge from their paid employment. Going forwards and when reviewing link trustee roles, trustees could potentially be linked to an aspect of the strategic plan that most closely aligns with their domain expertise.
- 2.11 The chief executive is responsible for ensuring that the executive provides the board with accurate, timely and clear information in a form and of a quality and comprehensiveness that will enable it to discharge its duties. This generally takes the form of a report from each function, and might be reviewed to reflect a more agile approach to current priorities led by trustees. (*recommendation*)
- 2.12 Trustees approve the amendments to the scheme of delegation annually. The scheme covers key areas but is largely operational. It does not cover the strategic role of the trust board for the key area of strategy and culture. It may be helpful to use a more recent sector scheme of delegation audit tool to review the scheme of delegation. (*recommendation*)

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- 2.13 The academy trust governance guide stipulates that all boards should appoint trustees to take specific strategic oversight responsibility on behalf of the board for SEND, and safeguarding both of which are in place

Delegations

- 2.14 The Governance Professional maintains accurate records of governance membership, attendance, and interests in line with requirements of the academy trust handbook (ATH) 2025. They also hold the position of company secretary and data protection officer.
- 2.15 There is a governance structure in place but the flow of communication between the trust board and ACCs could be improved. Local councillors do not feel any link to the Trust Board. Further consideration could be given to closer links between the layers of governance. (*recommendation*)
- 2.16 The trust board had established, and oversees, strong internal control processes to ensure propriety and value for public money.
- 2.17 Decisions and/or recommendations at Trust Board committee meetings are not routinely reported to the Board. It might be useful to set a standard agenda item to prompt committee Chairs to report updates, or share minutes from meetings with the Board paperwork. (*recommendation*)
- 2.18 The chair of trustees is not the chair of the audit and risk committee, and this is in line with expectations in the ATH 2025.
- 2.19 Processes for declarations of interest and related party transactions for the board and committees are clear and well managed by the governance professional. These could be monitored through sampling by the audit, and risk committee. (*recommendation*)

Local governance

- 2.20 Some but not all schools have academy community councils (ACCs). Whether a school has an ACC or not depends on a designation from the Ops Group and the commitment of the Principal to dedicate resources to it. The performance of schools in the Trust is in part overseen by the Ops Group via one of two different processes: Governance Review (GR) or Governance Review+. GR+ is for existing schools requiring additional support, or new schools joining the Trust. There is an expectation that GR schools have an academy community council (ACC).
- 2.21 There is no dedicated governance professional resource for ACCs; the responsibility for administering them rests with the Principal. To maintain compliance, and effective

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coordination of the groups, it would be useful to agree some dedicated support to manage statutory duties and record-keeping accurately. (*recommendation*)

Succession, appointments, and diversity

- 2.22 Recruitment to the Trust Board has been a focus and the group is now well populated. Recruitment of ACCs is an increasing challenge and most currently have vacancies. This will require more focus if ACCs are to be effective. (*recommendation*)
- 2.23 Appointments are made in line with AoA and in line with safe recruitment practices. There is induction in place for all tiers of governance. There is an induction programme which includes training from a third party. Trustees undertake mandatory annual training in key areas via an external provider, Flickr.
- 2.24 Succession planning is the key to futureproofing the board and ensuring it remains fit for purpose. There is a need for a succession plan in place for all key roles. Whilst trustees encourage succession planning and the career development of future leaders to increase the leadership capacity within the Trust, they might want to agree to a specific agenda item annually to ensure it is kept updated. (*recommendation*)
- 2.25 The trust board are aware of the benefits of having a diverse board and have recruited from a diverse range of professional backgrounds. They are aware of the need to ensure equality, diversity, and inclusion on their Trust board. Although not mandatory, there is strong guidance and encouragement from the Department for Education (DfE) and sector bodies like the National Governance Association (NGA) to collect and publish this data as part of good governance practice requirement (*recommendation*)
- 2.26 In the observed full-trust board meetings, all trustees had the opportunity to express their views. All trustees are expected to contribute and are asked for input.
- 2.27 The operating and governance model needs to reflect not just the MAT you are when you are established, but also the MAT you want to become in the future. If the MAT seeks to achieve its growth plan to 40 schools by 2026 (and 60 schools by 2035), the biggest risk will be the deterioration of educational outcomes in the existing portfolio as a result of senior leadership's focus on growth. In respect of growth, regional DfE directors will consider whether the Trust's model of due diligence enables the depth of the operational and strategic challenge to be fully understood. Trustee experience in this area will strengthen the Trust's position in this respect.

Accountability

Accountability has been held through well established relationships, trust, transparency, and all parties being fully committed to working towards a shared purpose. Accountability for the delivery of the strategic plan and the maintenance and improvement of high standards will

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need to be delivered through the trust board committees; to do this they will require trust-wide data reports triangulated with impact information from the ACCs. These clear lines of accountability will enable the trust to continue to thrive.

Educational quality and improvements across a group of schools

- 3.1 The CEO oversees a Trust with a strong track record for school improvement. His work is valued and respected by Trustees. Trustees are committed to improving outcomes for all children in their community and have brought schools into the Trust which required support.
- 3.2 The CEO has demonstrated significant school improvement expertise and made key appointments to build capacity. Expertise is targeted at the area of most need.
- 3.3 Regional Directors work closely with school leaders and have a deep understanding of strengths and areas to develop each school, leading to improvement and validation through Ofsted ratings. RDs identify strengths and areas for development in each school.
- 3.4 The recent addition of a trustee who is a CEO will enhance the educational knowledge on the board ensuring effective challenge and focus. Data is presented and scrutinised at the Academic Board however membership has previously been trustees without deep educational knowledge.
- 3.5 The board receives information and a commentary on key educational outcomes in the CEO's report. A developing more holistic data set including national/regional comparators is enabling all trustees to develop a thorough understanding of the strengths and areas for development of the trust's academies.
- 3.6 Whilst maintaining a focus on local autonomy, councillors feel there are further opportunities to strengthen collaboration and maximise the strength of the family of schools. This would lead to more collective responsibility for impact which will be monitored by the ACCs and strengthen the feeling of "one trust".

Fiduciary duty and financial governance

- 3.7 Trustees who sit on the finance committee have the professional knowledge and expertise to provide robust oversight of financial probity and deliver their fiduciary duties.
- 3.8 There is robust oversight and scrutiny of finance and operations by the trust board. Trustees receive quality data and information on which to base its scrutiny and challenge. There is a great deal of information in the meeting papers, and it would be useful to keep the quantity of data and information coming to the board under review.

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Management accounts are available via a Google folder to trustees. This could be more discreetly shared on a monthly basis in line with the stipulation in section 2.19 of the Academy Trust Handbook. (*recommendation*)

- 3.9 The board carries out its duties thoroughly and gives appropriate challenge to the Finance Director as is evidenced in meeting minutes.
- 3.10 The finance committee has trustees experienced in finance and risk. They review, challenge and recommend approval of budgets. There are regular reviews of reports which indicate financial performance against the forecasts and of major purchase plans, capital works and expenditure programmes.
- 3.11 The trust board reviews the submission of the trust budget to the DfE. They monitor income and expenditure across the trust to ensure delivery of the annual budget and challenge and approve trust wide financial reporting.
- 3.12 The audit programme is delivered well. Trustees ensure there is a sound audit programme delivered by external providers. Auditor's reports are presented to trustees for monitoring, action and follow up.
- 3.13 The finance committee fully investigates financial decisions and how they may impact the organisation.
- 3.14 The finance committee has financial oversight recommending the budget, cash management and investments. They advise the board that spending has been for the purpose intended and there is probity in the use of public funds, spending decisions represent value for money, internal delegation have been applied, a competitive tendering policy is in place and applied, and the procurement rules and thresholds in the public contracts regulations are observed.

Audit, risk, and internal controls

- 3.15 Whilst overall responsibility for risk and its management across the Trust rests with the Trust Board, the detailed scrutiny is passed to the Audit and Risk Committee, including reviewing the risk register and the associated controls and ensuring that required assurances are in place.
- 3.16 The board promotes a culture of sound management of resources but also understands that being over-cautious and risk averse can itself be a risk and hinder innovation.
- 3.17 External audit responses are appropriate and timely. The audit committee oversees robust and effective internal audit processes that are reported to them.

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- 3.18 Maturity of risk management is evident through the audit committee and the questions at meetings demonstrate deep scrutiny of all papers in advance of the meetings. The approach to the register broadly follows the lines of defence as recommended in the DfE academy trust risk management guidance. Discussions around risk in observed meetings demonstrate an understanding of the importance of strategic risk management. Trustees have a healthy recognition that it is an area that needs to be constantly kept under review and should be considered when the board is making key decisions for the Trust.
- 3.19 The link between school and trust risks is less clear. This might need more formal systems, so trustees know things are not being missed. They could perhaps have a summary register with details in appendices or the top 1-2-3 risks for each school.
- 3.20 The process for reviewing and updating policies is effective, although some are out of date due to a gap in staffing. The board could also consider undertaking scrutiny into the effectiveness and impact of policies. The audit committee could sample these policies linked to areas of risk.
- 3.21 The audit committee considers the appointment of the external auditor and assesses the independence of the external auditor, ensuring that key audit personnel are rotated at appropriate intervals. Members make the final appointment. The Audit Committee reviews the external audit programme and ensures that the internal audit function is adequately resourced and has appropriate standing within the trust.

Setting remuneration

- 3.22 The Remuneration Committee comprises three trustees who meet to consider any pay recommendation outside of the parameters of the pay policy set by trustees.
- 3.23 Scrutiny of the executive team performance is delegated to the CEO. The performance management of the CEO is undertaken by the Chair of Trustees.
- 3.24 The Ops team oversees Principal pay reviews.
- 3.25 The scrutiny of the Ops Team is robust, with the work of the CEO scrutinised by the trust board in their meetings.
- 3.26 Statutory publishing in regard to Executives is up-to-date and on the trust website.

External Accountability

- 3.27 The trust engages well with external accountable bodies, including the DfE.
- 3.28 They are transparent and open to external scrutiny and have consciously and purposefully developed relationships with regulators.

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- 3.29 External scrutiny is welcomed as evidenced by internal audit, although an external review of governance is overdue, having last been completed in 2022.
- 3.30 Minutes of trust board meetings provide a full and accurate account of decision making undertaken by trustees.
- 3.30 The Head of Legal and Governance is also the data protection officer and company secretary and ensures that companies' houses and the ICO are updated. The updated 2025 'Schedule of Musts' audit has been completed.

Compliance and care

The Trust board has a strong knowledge and understanding of their role, responsibilities and accountabilities as an employer and their duties under company law and charity law.

Trustees give adequate amounts of time to their role in the governance of the trust as well as the preparation for, and attendance at, board and committee meetings. The combination of these activities gives trustees an understanding of the trust, its academies and how the trust works in practice.

Support for trustees has improved since capacity has been added through a dedicated Head of Legal and Governance. She delivers an important role providing guidance, support and challenge on governance and policy matters. She also acts as the company secretary and data protection officer.

The Members comply with the statutory requirements regarding the Annual General Meeting and receiving the trust's audited annual report and accounts, although the meeting could be further refined. (*recommendation*)

Acting within powers

- 4.1 Trustees understand their role as directors and act in the best interest of the trust.
- 4.2 They act in accordance with the trust's articles of association and use their powers only for the purposes for which they were given. They promote the success of the trust and act in the trust's best interests.
- 4.3 In some meetings observed, trustees joined via video and made excellent contributions, asking questions, and seeking clarification. The trust's technology helped to facilitate impactful interaction with online participants.
- 4.4 The Head of Legal and Governance ensures the trust keeps a full record of any discussions and factors which were considered when taking key decisions. There is a duty to exercise reasonable care, skill and diligence and special skills and experience

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are used e.g., a trustee with finance or education skills exercise greater scrutiny of their area of expertise. Trustees are prepared to question and challenge.

Regularity, propriety, and value for money

- 4.5 The impact of financial decisions on education is considered. There is a process in place to ensure money is spent as intended. Value for money principles are embedded, as evidenced by a School Resource Management Adviser report from March 2025. Income and expenditure are dealt with in accordance with legislation, the terms of the trust's funding agreement, the Academy Trust Handbook, and compliance with internal trust procedures.

Conflicts of interest, and related party transactions

- 4.6 The Head of Legal and Governance ensures that the register is maintained and updated and published on the Trust website and is compliant.
- 4.7 The reporting requirements for related party transactions are known and understood. Conflicts of interest are requested and recorded both annually and at the start of every meeting. Pecuniary interests are recorded on the trust website and are up to date.
- 4.8 No related party transactions have been identified in this review.

Safety, safeguarding, welfare, and wellbeing

- 4.9 The safeguarding link trustee meets with the Trust safeguarding lead before each board meeting, where they collaboratively review a report outline safeguarding strengths and challenges at various levels. This process provides good assurance that there is a culture of safeguarding in the schools.
- 4.10 Safeguarding and whistleblowing training is undertaken by all trustees; engagement with training is recorded and monitored by the HR team. Safeguarding responsibilities are taken seriously by trustees. They are expected to read KCSIE annually.
- 4.11 There is a compliance culture, however, it would be valuable for training expectations to include an actual course (whether in-house or via an external provider) that would encourage knowledge to be assessed to ensure understanding.
- 4.12 Health and safety legislation is known and reviewed.
- 4.13 Trustees consider welfare and wellbeing in all that they do. The wellbeing of employees was a prominent discussion point in all meetings observed in this review.

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Care, skill, and diligence, and the bond of trust

- 4.14 Corporately and individually trustees are diligent, careful, and well informed; they take steps to know the trust well and seek external support where required.
- 4.15 Trustees understand their moral duty in relation to young people, families, communities and staff and act accordingly. They have high aspirations for the young people within the trust and commit to ensuring their charitable objects are met.
- 4.16 Decisions are based on evidence and trustees apply care, skill, and diligence to ensure a child centred approach and that they are focussed on advancing education.

Local governance

Local governance is through ACCs that are based in around a third of schools.

Councillors spoken to are committed to their schools and knowledgeable about their communities.

The community council should nominate a chair for appointment by the Trust Board, however in practice this does not occur and ACCs nominate their own chair.

Trends in general feedback and comments made reference to a lack of useful remit for community councils, and their purpose and impact. Many schools also cited lack of capacity at a school level to provide sufficient support for a community council.

Clarity of roles and responsibilities

- 5.1 Their remit is as follows:
- Evaluate whether the school's vision and ethos reflect the lived experiences of pupils, parents, staff, and the wider community.
 - Consider how well the school's curriculum supports and develops all of its pupils so that they are able to contribute positively to life in modern Britain and are ready for the next stage of their education.
 - Champion the strengths and achievements of the school and the Trust to parents, staff, and the wider community.
- 5.2 In practice, many ACCs deviate from their remit, focussing more on stakeholder engagement and community connection.

Links to the trust board

- 5.3 There are no formalised reporting links between the two groups. At the end of each meeting the Community Council is asked to agree on up to three key messages that they wish to bring to the attention of the Trust. This may include positive assurances

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about the experiences of pupils, staff, and parents, as well as any other matters they would like the Trust to be aware of. These messages should be shared with the Trust via a Google Form. Only 4 responses have been received since February 2025. The Board could consider ways in which there can be more direct communication between the ACCs and the Board, so that it can be confident that board decisions are well-informed by the local context.

- 5.4 The intention to hold a regional termly Chairs' Forum September 2025 was mooted, but not followed-up, which led to some disappointment at a local level. Councillors spoken to were keen to receive direct information from the board.
- 5.5 Councillors feel that more could be done to connect councillors across schools, sharing practice and feeling more connected to one trust. Many do not distinguish the executive from the trust and feel that trustees are quite remote.
- 5.6 There is a policy for councillor visits to schools. Councillors complete standardised reports from visits which allow for customisation. Feedback reports are not routinely completed or monitored for emerging themes and risks identified.
- 5.7 Comprehensive and high quality supporting documentation is available on the Trust intranet, including ACC ways of working, recruitment, induction, meeting templates and agenda plans. A minority of this information is significantly out-of-date, including newsletters (last published in 2022).
- 5.8 Where community councils are working well, members take the time to visit the school and see it in action; senior leaders value the input from the extended school community; and there is an identified member of school staff who has responsibility for supporting the community council to ensure it is working effectively.

Stakeholder engagement

- 5.8 ACCs are having a limited impact on meaningful parent, school, and community engagement, which the board is responsible for. This constraint is attributed in part to poor information exchange between the ACCs and the Trust Board, and in part because only around a third of eligible schools have an active ACC. (*recommendation*)

Compliance and support

- 5.10 From a random sample of six ACCs (two per region), only one is meeting statutory publishing requirements in regards to pecuniary interests, membership, and attendance. This will need remedying so that the Trust is meeting the requirement of the ATH. (*recommendation*)

Recommendations

1. Consider embedding the Trust values into the performance management process.
2. Skill audit/self-evaluation to inform the ongoing bespoke training offer for members/trustees.
3. Review ACC terms of reference to ensure that responsibility for reviewing and considering improvements to schools vis-a-vis the parental surveys is taken by the ACCs, with support from the Trust Board.
4. Consider publishing Trust Board diversity data (aggregated and anonymised) such as ethnicity, gender, age, sexual orientation, religion etc.
5. Seek best practice from other national MATs about how to better engage all stakeholders in the AGM.
6. Aim for the Chair of the Finance Committee to not also be the Chair of the Trust Board.
7. Repurpose the AGM agenda to better reflect the additional role of the Members to hold the Trust Board to account. AGM minutes should be approved at the subsequent AGM, not the Trust Board.
8. Review Board reporting to reflect a more agile approach to current priorities led by trustees, rather than a report from each functional area.
9. Review the scheme of delegation to incorporate the strategic role of the trust board for the key area of strategy and culture.
10. Further consideration could be given to closer links between the layers of governance.
11. Set a standard Board agenda item to prompt committee Chairs to report updates, or share minutes from meetings with the Board paperwork.
12. Declarations of interest and related party transactions to be monitored through sampling by the audit, and risk committee.
13. Ensure that management accounts are shared with the Trust Board Chair monthly.
14. Agree some dedicated support for ACCs, to manage statutory duties and record-keeping more effectively.
15. Consider how to support recruitment to ACCs centrally.
16. Formalise succession planning for Trustees, Ops team and other key roles as part of an annual agenda item for the Board.
17. Ensure that statutory publishing requirements are fulfilled for ACCs (attendance, declarations of interest, membership)