

Scheme of Delegation September 24

Extol's scheme of delegation is designed to:

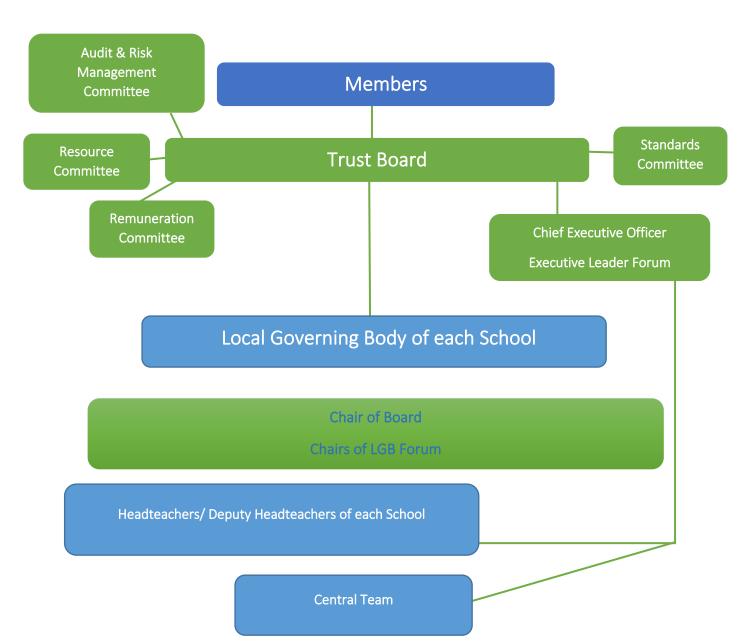
- Set out the Trust's approach to delegation between the different layers of governance;
- be read in conjunction with the Trust's Governance documents including Committee Terms of Reference;
- ensure that all stakeholders are clear about which decisions the Trust Board remain in control of;
- identify responsibility for policy and practice in each school;
- Insure that the role of the Central Team is fully understood throughout the Trust;
- promote a culture of honesty and accountability;
- identify responsibility for the appointment and performance management of the CEO, senior members of the Trust Central Team and schools' senior leadership team, including Headteachers;
- identify responsibility for oversight of each school's budget;
- identify responsibility for assessment of risk in each school;
- identify responsibility for oversight of educational performance in each school.

The Trust's Scheme of Financial Delegation (Extol Trust's – Financial Authorisation Levels), which the Trust is required to have under the Academy Trust 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.

Our scheme of delegation is organised into three sections as follows:

- Sovernance;
- Strategic Policies
- Strategic Operations including:
 - High quality and inclusive education
 - School Improvement
 - Finance and operations
 - Workforce
 - Governance and Leadership





Our Governance Structure and lines of accountability

The role of the Members

The members of the Trust have a different status to Trustees. They are the signatories to the Memorandum of Association and have agreed the Trust's Articles of Association (a document which outlines the governance structure and how the Trust will operate). The Articles of Association describes how Members are recruited and replaced. The Members appoint Trustees to ensure that the Trust's charitable object is carried out and so must be able to remove Trustees if they fail to fulfil this responsibility. Accordingly, the Trust Board submits an Annual Report on the performance of the Trust to the Members. Members are also responsible for approving any amendments made to the



Trust's Articles of Association.

Within Extol Trust, Members are permitted to be appointed as Trustees, however in order to retain a degree of separation of powers between the Members and the Trust Board, and in line with DfE expectations, a maximum of two members are Trustees. In line with The DfE amended model Articles Members are not permitted to be employees of the Trust.

The role of the Trustees

The Trustees are the charity Trustees (within the terms of section 177(1) of the Charities Act 2011) and are responsible for the general control and management of the administration of the Trust in accordance with the provisions set out in the Memorandum and Articles of Association. The Board of Trustees is the accountable body for the performance of all schools within the Trust and as such must:

- 1. Ensure clarity of vision, ethos and strategic direction
- 2. Hold the executive to account for the educational performance of the schools and their pupils, and the performance management of staff
- 3. Oversee the financial performance of the Trust and make sure its money is well spent

Because Trustees are bound by both charity and company law, the terms 'Trustees' and 'Directors' are often used interchangeably. We use the term Trustee as it avoids the possible confusion caused when senior leaders in their fields are called directors but are not company directors and Trustees.

The Trust Board is permitted to exercise all the powers of the Trust. The Trust Board delegates to the Chief Executive responsibility for the day-to-day operations of the Trust. The Trustees determine whether to delegate any governance functions through the Scheme of Delegation.

The Trust has the right to review and adapt its governance structure at any time which includes removing delegation.

The role of Trust Committees

The Trustees have established committees either with delegated authority to make decisions or for the purpose of providing advice and support, informing the overall work of the Trust Board. However these committees are not legally responsible or accountable for statutory functions; the Trust Board retains overall accountability and responsibility. The responsibilities of Board Committees are set out in their terms of reference; the responsibilities for individual school Governing Committees are set out in the Scheme of Delegation and Local Governing Body terms of reference. The Trust Board appoints committee members and committee chairs.

The role of the Local Governing Body (LGB)

The Trust Board will establish LGBs, appoint the Chair, ensure two parents are elected and will determine what will be delegated. Typically, responsibilities may include:

- Building an understanding of how the school is led and managed
- Oversight of Safeguarding
- Monitoring whether the school is:



- Working within agreed policies
- Is meeting the agreed targets
- Monitoring and evaluating its use of finance
- Engaging with stakeholders and its community
- Reporting to the Board

As a committee of the Board, delegation can be removed at any time.

The role of the Chief Executive Officer (CEO)

The CEO has the delegated responsibility for the operation of the Trust including the performance of the Trust's schools and so the CEO performance manages the schools' Headteachers. They work closely with the School Executive Leader Team, meeting regularly to drive forward vision, culture and school improvement.

The CEO is the Accounting Officer so has overall responsibility for the operation of the Trust's financial responsibilities and must ensure that the organisation is run with financial effectiveness and stability; avoiding waste and securing value for money.

The CEO leads the Central Team of the Trust. The CEO will delegate executive management functions to the Executive Central Team and is accountable to the Trust Board for the performance of the Central Team.

The role of the Accounting Officer

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

The Accounting Officer must have oversight of financial transactions in line with the Academy Trust Handbook.

The Accounting Officer must complete and sign a statement on regularity, propriety and compliance each year and submit this to ESFA with the audited accounts. They must demonstrate how the Trust has secured value for money via the governance statement in the audited accounts.

The accounting officer must take personal responsibility (which must not be delegated) for assuring the board that there is compliance with the funding agreement and handbook.

The role of the Chief Financial Officer (CFO)

The core purpose of the CFO is to support and manage all financial related aspects to the Trust and across all schools within the Trust. They are responsible for the financial sustainability and development of Extol Academy Trust. The CFO plays both a technical and leadership role and must be employed by the Trust, and the trust must obtain prior ESFA approval, if it is proposing, in exceptional circumstances to appoint a CFO who will not be an employee. The CFO works closely with the CEO ensuring the provision of key financial information to assist in strategic planning.



The CFO leads the promotion and delivery of good financial management so that public money is safeguarded and used appropriately, efficiently and effectively.

The role of the Headteacher

The Headteacher is responsible for the day-to-day management and leadership of a school. The Headteacher is held to account by the Chief Executive Officer but reports to the LGB on matters which have been delegated to the LGB.

Schedule of Delegation

Кеу
Level 1: Members
Level 2: Board of Trustees of the Trust/ includes specified committees
Level 3: Chief Executive Officer
Level 4: Local Governing Body (LGB)
Level 5: Headteacher
Blue box Function cannot be legally carried out at this level.
 Action to be undertaken at this level
 Decision to be undertaken at this level but subject to Board approval
A Provide advice and support to those accountable for decision making
<> Direction of advice and support



Area	Decision/Action	Delegation						
Alea	Decision/Action	Members	Trust Board	CEO	LGB	Headteacher		
	Governance Fra	mework						
	Appoint and remove Members in accordance with Articles	~						
	Trustees : Appoint / Remove in accordance with Articles	✓						
	Chair of Board: Appoint / Remove in accordance with Articles	✓	<a< td=""><td></td><td></td><td></td></a<>					
People	Agree role descriptions for Chair, Trustees and agree specific roles for committee members	~	<a< td=""><td></td><td></td><td></td></a<>					
Pe	Trust sub-committee chairs: Appoint / Remove		✓					
	LGB chairs: Appoint / Remove		✓		<a< td=""><td></td></a<>			
	Clerk to the board and LGB: Appoint / Remove		✓					
	Specify named Trustees For Safeguarding		✓					
	Determine the objects of Extol	✓						
	Agree and review Articles of Association	✓	<a< td=""><td></td><td></td><td></td></a<>					
	Determine Scheme of delegation: agree and review annually		✓	<a< td=""><td></td><td></td></a<>				
Ires	Governance structure (no. of sub-committees, composition & Terms of Reference) for the Trust: Establish and review annually		~	<a< td=""><td></td><td></td></a<>				
rctu	Determine governance representation at Ofsted inspections		✓	<a< td=""><td>✓</td><td><a< td=""></a<></td></a<>	✓	<a< td=""></a<>		
Systems and Structures	Agree annually terms of reference and business schedules for Trust committees and LGBs		~	<a>	✓			
s an	Chair's LGB Group: participate (chairs of LGB)		✓	<a>	✓			
stem	Executive Leader Group; Headteacher and Deputy Headteachers participate			\checkmark		~		
Sy	Set and Deliver strategic objectives of the Trust	\checkmark	✓	\checkmark	✓	✓		
	Set individual school's vision and strategy, agreeing key priorities and key performance indicators (KPIs) against which progress towards achieving the vision can be measured		~	A>	~	<a< td=""></a<>		
	Undertake skills-audit annually to maintain skilled and balanced Board		✓		✓			

Area	Decision/Action			Delegation		
AICa	Decision/Action	Members	Trust Board	CEO	LGB	Headteacher
S	To appoint external auditors to certify whether the annual accounts present a true and fair view of the Trust's financial performance and position	>	<a< td=""><td></td><td></td><td></td></a<>			
inre	Review annually Member/Trustee contribution	~				
Structures ued)	Complete annually self review of Trust Board and Committee performance		✓			
Systems and Stru (continued)	Completion of annual self-assessment by LGB to be submitted to full Board for review		~		~	
ems (c	Trust Chair's performance: carry out 360 review annually	\checkmark				
yste	LGB Chair's performance: carry out 360 review annually		✓	<a< td=""><td><a< td=""><td></td></a<></td></a<>	<a< td=""><td></td></a<>	
S	Establish a core governance induction and training programme		✓	<a< td=""><td></td><td></td></a<>		
	Establish a bespoke training programme for audit of need		✓	<a< td=""><td>✓</td><td><a< td=""></a<></td></a<>	✓	<a< td=""></a<>
	Establish and publish register of all interests, business, pecuniary for Members, Trustees, LGB and senior leaders		✓	<a< td=""><td>~</td><td><a< td=""></a<></td></a<>	~	<a< td=""></a<>
	Agree annually procedure to deal with any conflict of interests and connected party transactions	✓				
ting	Trust risk register reviewed termly by Full Board and Committees; outcomes reported to Members annually through a prepared report		~	<a< td=""><td></td><td></td></a<>		
Reporting	Annual report on performance of the Trust: submitted to Members and published	~	<a< td=""><td></td><td></td><td></td></a<>			
Υ Υ	Annual report and accounts including accounting policies, signed statement on regularity, propriety and compliance, incorporating governance statement demonstrating value for money submitted to EFSA		~	<a< td=""><td></td><td></td></a<>		
	Timely update of the GIAS details for the Trust and Schools		A>	\checkmark	A>	✓



Area	Decision/Action			Delegation		
Alea	Decision/Action	Members	Trust Board	CEO	LGB	Headteacher
യ	Ensure systems allow for communication between Schools and the Trust Board and vice versa		~	<a>	~	<a< td=""></a<>
Reporting	Ensure Trust governance details are published on Trust and School websites	A>	~		~	
Ř¢	Ensure Trustee and LGB Members attendance reported and published on relevant websites		~		~	
	Determine Trust policy review process and schedule		✓	<a< td=""><td></td><td></td></a<>		
	Determine School policy review process and schedule			A>	✓	<a< td=""></a<>
cies	Determine Trust wide policies which reflect the Trust's ethos and value including: Pay and Appraisal Policy, Governance, Charging and Remissions; Complaints; Health and Safety, Equality, Data Protection and FOI; all Staffing Policies including Capability, Performance Management, Conduct and Grievance: Approve		~	<a< td=""><td></td><td></td></a<>		
Strategic : Policies	Determination of Published Admission Policy and written consent to changes to admission criteria		~	<a< td=""><td></td><td></td></a<>		
egic	Determine Safeguarding Policy and Procedures		✓	<a< td=""><td></td><td></td></a<>		
crate	Determine Attendance Policy and Procedure		✓	<a< td=""><td></td><td></td></a<>		
St	Define the Extol rationale for curriculum intent		✓	<a< td=""><td></td><td></td></a<>		
	Determine school level policies/guidance which reflect the school's ethos and values to include e.g. SEND; Local Safeguarding, Nursery and 2 yr old provision, Curriculum, Behaviour Ratification at Board		~	A>	~	<a< td=""></a<>
	Determine rationale for financing central operations - Central Fund Policy		✓	<a< td=""><td></td><td></td></a<>		



Area	Decision/Action			Delegation		
Aica	Decision/Action	Members	Trust Board	CEO	LGB	Headteacher
	Establish a Trust risk register: Review and monitor		\checkmark	<a< td=""><td><a< td=""><td><a< td=""></a<></td></a<></td></a<>	<a< td=""><td><a< td=""></a<></td></a<>	<a< td=""></a<>
	Trust and school websites are compliant		✓	<a< td=""><td>✓</td><td><a< td=""></a<></td></a<>	✓	<a< td=""></a<>
	Appoint bankers and agree banking arrangements and signatories for the Trust		~	<a< td=""><td></td><td></td></a<>		
	Ensure appropriate insurance arrangements for all aspects of Trust		✓	<a< td=""><td></td><td></td></a<>		
	Setting Trust safeguarding practices, with regard to statutory guidance		✓	<a< td=""><td></td><td></td></a<>		
S	Ensure compliance with safeguarding policy and practice, including annual update of KCSIE		~	<a>	~	~
ratior	To formally approve the annual budget of the Trust and each school in line with ESFA deadlines and in consultation with LGB		~	<a>	<a< td=""><td><a< td=""></a<></td></a<>	<a< td=""></a<>
Ope	Set Trust's Central staffing structure		✓	<a< td=""><td></td><td></td></a<>		
Strategic: Operations	To determine the scope of mandatory core services to be delivered or procured by Extol Trust on behalf of its schools i.e. school meals		~	\checkmark		
Str	Approve individual schools staffing structure proposal		✓	<a>	~	<a< td=""></a<>
	Determination of Published Admission Policy and written consent to changes to admission criteria		~	<a< td=""><td><a< td=""><td></td></a<></td></a<>	<a< td=""><td></td></a<>	
	Agreeing significant changes to an academy (e.g. changes to premises, change of age range, change to designation)		✓	<a< td=""><td></td><td></td></a<>		
	Approve individual school's term dates and length of school day within statutory guidance		~	<a>	~	<a< td=""></a<>



	Decision/Action	Delegation						
Area		Members	Trust Board	CEO	LGB	Headteacher		
	Auditing and reporting arrangements for matters of compliance (e.g. safeguarding, H&S, employment): agree		✓	<a< td=""><td></td><td><a< td=""></a<></td></a<>		<a< td=""></a<>		
unt	Reporting arrangements for progress on key priorities: agree		✓	<a< td=""><td></td><td><a< td=""></a<></td></a<>		<a< td=""></a<>		
Holding to Account	Apply Classification of Schools model		✓	<a< td=""><td></td><td></td></a<>				
g to	Performance management of the Chief Executive Officer		✓					
oldin	Performance management of senior Trust central staff			\checkmark				
Ĭ	Performance management of Headteachers : undertake			\checkmark				
	Sub-committee (including LGB) monitoring; agree arrangements		✓	<a< td=""><td><a< td=""><td></td></a<></td></a<>	<a< td=""><td></td></a<>			



Area	Decision/Action	Delegation						
7.1.00		Members	Trust Board	CEO	LGB	Headteacher		
	High Quality and Inclus	sive Educatio	on .					
	Ensuring the legal requirements and Safeguarding duties are met		 ✓ 	<a>	~	<a< td=""></a<>		
	Setting Trust approach to curriculum and assessment,		✓	<a< td=""><td></td><td></td></a<>				
	Delivering Early Years Foundation Stage (EYFS), in line with statutory requirements			A>	✓	<a< td=""></a<>		
	Production and analysis of educational data			\checkmark		✓		
ations	Ensure School Securing Improvement Plans are in line with strategic aims of the Trust and address any areas of an individual school's development areas		~	A>	~	<a< td=""></a<>		
Strategic: Operations	 Evaluate performance of School ; Review against KPIs ; holding leaders to account Termly review of standards of attainment Receiving termly reports on the quality of T & L from Improvement Adviser Review annual impact; including attendance, exclusions, safeguarding, staff well-being 		~	<a< td=""><td>√</td><td><a< td=""></a<></td></a<>	√	<a< td=""></a<>		
	Setting the curriculum for the School and reviewing effectiveness			<a>	✓	<a< td=""></a<>		
	Ensuring the legal requirements for children with SEND are met within curriculum offer		~	<a>	~	<a< td=""></a<>		



Area	Decision/Action	Delegation						
		Members	Trust Board	CEO	LGB	Headteacher		
	Ensuring the legal requirements and Equality duties are met		✓	<a>	~	<a< td=""></a<>		
Strategic: Operations	Establishing a comprehensive Pupil Premium Strategy which addresses any achievement variance		~	A>	~	<a< td=""></a<>		
Stra Opei	Establishing a comprehensive Sport's Premium Strategy		✓	A>	~	<a< td=""></a<>		
	Agree collective worship and equality arrangements		✓	A>	~	<a< td=""></a<>		
	Establishment of a robust school self evaluation cycle			A>	A>	~		
lity	To approve and evaluate the impact and effectiveness of curriculum policies at individual school level			A>	✓	~		
untabi	To approve and evaluate the impact and effectiveness of pastoral policies at school level			A>	~	~		
Strategic : Accountability	To monitor the quality of extracurricular provision at school level taking into consideration the views of stakeholders			A>	✓	~		
ategi	Production of an annual accurate SEF			A>	A>	✓		
Stra	Standards of teaching and learning at school level.		✓	<a>	✓	✓		
	Detailed scrutiny of performance of schools, groups of pupils and the effectiveness of provision		~	~	~	~		



Ensure there are procedures in place across the Trust to fulfil statutory requirements in relation to attendance, especially for children missing in education	✓	<a< th=""><th></th><th><a< th=""></a<></th></a<>		<a< th=""></a<>
To monitor the effectiveness of attendance strategies in place at school level to ensure maximum pupil attendance	~	A>	~	✓
Auditing and reporting arrangements for matters of compliance (e.g. safeguarding):	✓	<a< td=""><td>~</td><td><a< td=""></a<></td></a<>	~	<a< td=""></a<>



Area	Decision/Action			Delegation		
Aica		Members	Trust Board	CEO/CFO	LGB	Headteacher
	Finance and Ope	erations				
	Appointment of Accounting Officer	~				
	Appoint external auditors for the Trust	✓	<a< td=""><td></td><td></td><td></td></a<>			
	Appoint internal auditors for the Trust		✓	<a< td=""><td></td><td></td></a<>		
	Ensure compliance with the provisions of the funding agreements including the Academy Trust Handbook		~	<a< td=""><td></td><td></td></a<>		
suo	Approve the annual budget of the Trust in line with ESFA requirements and deadlines		~	<a< td=""><td></td><td></td></a<>		
Operati	Approve the annual budget of each school in line with ESFA requirements and deadlines		~	<a< td=""><td><a< td=""><td></td></a<></td></a<>	<a< td=""><td></td></a<>	
Strategic: Operations	To consider respective individual summary school budget monitoring and forecast reports and make any appropriate business decisions as a result of these, reporting any issues of concern to Trustees		~	<a< td=""><td><a< td=""><td></td></a<></td></a<>	<a< td=""><td></td></a<>	
S	To approve and monitor the financial reserves at Trust and individual school level		~	<a< td=""><td></td><td></td></a<>		
	To consider the consolidated Trust budget monitoring reports and forecasts, making any appropriate business decisions as a result of these		~	<a< td=""><td></td><td></td></a<>		
	To receive and monitor the monthly management accounts, making appropriate business decisions regarding the Trust financial strategy in consultation with the Trust Board where necessary		~	<a< td=""><td></td><td></td></a<>		



Establish and approve the Trust's financial and procurement procedures and policies ensuing compliance with the provisions of the funding agreements and Academy Trust Handbook	5	~	<a< th=""><th></th></a<>	
Internal auditors and other external professional advisers to assure the Trust Board that its financial and other controls, and risk management procedures, are operating effectively		~	<a< td=""><td></td></a<>	
Agree Trust's scheme of financial delegation (Extol Trust Financial Authorisation Levels) : review annually		~	<a< td=""><td></td></a<>	
Receive and respond to External and Internal auditors' reports		✓	<a< td=""><td></td></a<>	
Approve Annual Accounts	✓	<a< td=""><td></td><td></td></a<>		
Consider annually SRMA dashboard and other financial benchmarking information to ensure Trust wide value for money		~	<a< td=""><td></td></a<>	
Agree centralised financial systems , including banking provider & accountancy software		~	<a< td=""><td></td></a<>	
Related Party Transactions: Report in accordance with ESFA requirements		~	<a< td=""><td></td></a<>	



Area	Decision/Action			Delegation		
Aica		Members	Trust Board	CEO	LGB	Headteacher
	Workforc	e				
	Determine and adopt policies and set pay terms for all staff including contracts, terms and conditions		~	<a< td=""><td></td><td></td></a<>		
	Appoint and dismiss Chief Executive Officer	~	<a< td=""><td></td><td></td><td></td></a<>			
	Appointment of Chief Financial Officer for delivery of Trust's detailed accounting processes		~	<a< td=""><td></td><td></td></a<>		
ations	Appointment of a Headteacher and all other posts embedded on the leadership spine (including Lead Practitioner posts).: (Invited involvement of the chair of relevant LGB)		~	<a>	~	<a< td=""></a<>
Strategic: Operations	To consider and approve changes to school ISRs (Individual School Ranges) for Headteacher and Leadership pay ranges		~	<a< td=""><td></td><td></td></a<>		
trategic	Appointment of teaching and support staff at school level (not to be delegated below HT)				~	~
St	Appointing designated safeguarding lead (DSL)				✓	✓
	Appoint a designated teacher to promote the educational achievement of looked-after and certain previously looked- after children who are on the school roll				~	~
	To ensure a SENDCo is appointed at school level				✓	✓
	To ensure an Educational Visits Coordinator is appointed at school level				✓	~



	To ensure a SLT member appointed to oversee cyber security and that digital standards met			~	~
	Ensure robust system for carrying out disclosure and barring service (DBS) checks for school staff			~	~
	Monitor and agree appraisal policy and procedure	\checkmark	<a>	~	✓
	Undertake appraisal of the Chief Executive Officer	\checkmark			
	Undertake appraisal of the Chief Finance Officer	\checkmark	~		
	Dismiss School leaders including HT and DHT	\checkmark	<a< td=""><td><a< td=""><td></td></a<></td></a<>	<a< td=""><td></td></a<>	
	Ensure safer recruitment practices are followed at school level		A>	~	 ✓
	Maintain accurate and secure employee records - school level			~	✓
suc	Undertake appraisal of Headteachers	✓	~	<a< td=""><td></td></a<>	
eratio	Appraisal of school staff from DH level, awarding of pay progression		A>	~	<a< td=""></a<>
Strategic: Operations	Set executive pay scales and agree pay awards	✓			
	Agree pay awards for Headteacher	\checkmark	<a< td=""><td></td><td></td></a<>		
	Consider pay review requests of main scale staff and support staff below Band 10		A>	~	~
	Consider pay review requests/regrades of senior staff (Leadership posts under STP&C and support staff posts at band 10 and above)	~	<a< td=""><td></td><td></td></a<>		



Area	Decision/Action	Delegation					
		Members	Trust Board	CEO/EM	LGB	Headteacher	
	Estate Manage	gement					
	Ensure a suitable programme of estate compliance and strategy is in place; receive plan and approve		~	<a< td=""><td></td><td></td></a<>			
	Determine Capital Programme for large projects		✓	<a>	<a< td=""><td><a< td=""></a<></td></a<>	<a< td=""></a<>	
	Exercise responsibilities for maintenance and improvement of the buildings and facilities (where delegated to do so)		~	<a>	~	~	
ons	Agree school property change of use applications		✓	<a< td=""><td><a< td=""><td></td></a<></td></a<>	<a< td=""><td></td></a<>		
erati	Purchase or sale of property Trust estate		~	<a< td=""><td></td><td></td></a<>			
:: Ob	Entering into any letting's agreements		✓	<a< td=""><td>~</td><td><a< td=""></a<></td></a<>	~	<a< td=""></a<>	
Strategic: Operations	Hire of premises Lettings – Complete appropriate paperwork in line with Lettings Policy					✓	
St	Agree small maintenance and suitability projects			A>	~	<a< td=""></a<>	
	Ensure all school estates meet Safeguarding requirements		✓	<a>	~	~	
	Agree Trust Health and Safety Policy		~	<a< td=""><td></td><td></td></a<>			
	Ensure all premises staff have received relevant training in line with their role			A>	~	~	



Disposal or acquisition	of land and property	✓	<a< th=""><th>\checkmark</th><th>✓</th></a<>	\checkmark	✓
Monitor compliance of	buildings across Trust	✓	<a>	✓	
Agree individual Schoo	l's H & S guidelines which align to Trust Policy		A>	~	<a< td=""></a<>
Receive and challenge	accident near miss reports across the Trust	✓	<a< td=""><td></td><td></td></a<>		
Establishment of a Sus	tainability and Environmental Policy	✓	<a< td=""><td></td><td></td></a<>		
	e carbon reduction through adherence of above at of energy champions	~	<a< td=""><td>~</td><td>~</td></a<>	~	~