



Department
for Education

Department for Education
2 St Paul's Place
125 Norfolk Street
Sheffield
S1 2FJ

Tel: 0370 000 2288

www.gov.uk/contact-dfe

Email enquiry form:

www.education.gov.uk/contactus/dfe

Date: 18 June 2026

Mr Nathan Greenfield
Chair of Trustees
Hull Collaborative Academy Trust,
C/O Dorchester Primary School,
Dorchester Road,
Hull,
HU7 6AH.

Company Number: 08542806

By email: [REDACTED]

Dear Mr Greenfield

Notice to improve: Hull Collaborative Academy Trust

We are writing to you as Chair of Trustees for Hull Collaborative Academy Trust ('the trust') to inform you that we are issuing the trust with a Notice to Improve because of financial management and governance concerns.

As you are aware, the Department for Education Funding and Financial Oversight (FFO) team conducted an investigation, following whistleblowing allegations. As part of this, the trust was asked to provide financial and governance information from 2016 onwards. The investigation identified 12 breaches of the Academy Trust Handbook (ATH), a full list of ATH breaches is available in **Annex A**.

Whilst we recognise that the trust has taken some action to address matters, the extent of issues identified means that the department does not have sufficient assurance of good financial management and governance within the trust.

This letter and its annexes serve as a written notice to improve financial management and governance at the trust (Notice to improve, Ntl or "the Notice"). It reflects continued concerns in relation to governance and oversight of financial management by the Board.

The trust is required, pursuant to the provisions of the ATH, to comply with the terms of this Notice. These terms are set out in **Annex B**.

Being issued with the Notice means that certain delegated authorities, as defined in the ATH, have been revoked. All transactions previously covered by these delegations, regardless of their size, must now be approved in advance by the Department for Education Schools Financial Support and Oversight (SFSO) team, specifically:

- special staff severance payments
- compensation payments
- writing off debts and losses
- entering into guarantees, indemnities or letters of comfort
- disposals of fixed assets beyond any limit in the funding agreement
- taking up a leasehold or tenancy agreement on land and buildings of a duration beyond any limit in the trust's funding agreement
- carry forward of unspent GAG from one year to the next beyond any limit in the Funding Agreement
- pooling of GAG
- Related Party Transactions
- Foreign travel
- Consultancy arrangements
- Use of property by any non-trust entities

If the trust seeks retrospective approval from SFSO this will be deemed a breach of the ATH. Further details of the approval process will be forwarded to the Accounting Officer upon acknowledgment of receipt of this letter. These delegated authorities shall be returned to the trust once we are satisfied that the requirements of the Notice have been, and will continue to be, complied with to the satisfaction of the Secretary of State. We will monitor progress made towards meeting the requirements of this Notice. We will lift the Notice when the requirements set out in **Annex B** have been met in full.

We reserve the right to issue a revised Notice and add further specific conditions if required, should the trust fail to make sufficient progress against the original conditions. Should it become evident that the trust is unlikely to fulfil the conditions and/or requirements set out in the Notice and/or within the agreed timescales, we will explore the contractual intervention options available.

In the event that the trust fails to meet the requirements of the Notice to the satisfaction of the Secretary of State, the trust will be considered to have failed to comply with the terms of the ATH. This will amount to a breach of the terms of the FA and may lead to termination.

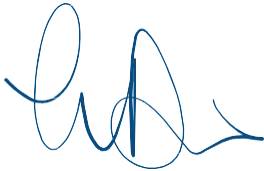
If continued non-compliance with the ATH occurs, we may also refer the case to the Charity Commission and/or Insolvency Service for further investigation, as deemed appropriate in the circumstances.

We should be grateful if you would acknowledge receipt of this letter by email within three working days of the date of this letter to [REDACTED] In line with the requirements set out in DfE publishing policy, the trust has 10 working days to offer any final comments on factual accuracy before publication. The trust is required to publish the Ntl on its website within 14 days of it being published on gov.uk and retain it on the website until the Ntl is lifted.

We are copying this letter to the Chief Operating Officer Mr Kevin Matchett.

We look forward to hearing from you.

Yours sincerely



Gavin Davies
Interim Director, Schools Financial Support & Oversight, Regions Group,
Department for Education



Alison Wilson
Regional Director for Yorkshire and Humber, Department for Education

Annex A: Hull Collaborative Academy Trust

List of Academy Trust Handbook Breaches

1. Failure to Maintain Complete and Accurate Registers of Interest

- ATH paragraph 1.45 – The Trust failed to keep a register of any relevant business and financial interests, including governance roles in other educational institutions, for (as a minimum) members, trustees, local governors and senior employees, serving at any point over the past 12 months.
- ATH paragraph 1.47 – The Trust failed to consistently identify and record close family and business relationships in its registers of interests, with omissions across multiple years.
- ATH paragraph 1.48 – Registers of interests were not kept up to date or consistently retained, limiting trustee and departmental oversight.

2. Failure to Demonstrate Regularity, Propriety and Value for Money

- ATH paragraph 2.24 – The Trust was unable, in several cases, to demonstrate that public funds were used only for the purposes intended by Parliament.
- ATH paragraph 2.25 – The Trust failed to evidence propriety and value for money, including:
 - Lack of competitive procurement
 - Insufficient benchmarking of costs
 - Inadequate documentation supporting spending decisions

3. Uneven and Non-Transparent Treatment of Related Parties

- ATH paragraph 5.36 – The Trust failed to demonstrate even handed treatment in its relationships with related parties, particularly in recruitment, pay decisions and use of Trust facilities.
- ATH paragraph 5.38 – The Trust did not appropriately identify, manage or mitigate real and perceived conflicts of interest, including situations where senior leaders or trustees approved matters involving close connections.

4. Inadequate Record Keeping and Financial Disclosures for Related Parties

- ATH paragraph 5.40 – The Trust failed to keep sufficient records and make accurate disclosures in its accounts regarding related party transactions; disclosed amounts could not always be reconciled to underlying records.
- ATH paragraph 5.41 – Required related party transaction notifications were not consistently submitted to ESFA in advance, including at least one transaction disclosed retrospectively or inaccurately.

- ATH paragraph 5.49 – The trust failed to pay no more than ‘cost’ for goods or services.

5. Novel, Contentious or Repercussive Expenditure Without Approval

- ATH paragraph 5.6 – The Trust failed to seek ESFA approval in advance for novel, contentious or repercussive expenditure, including overseas travel by senior leaders.

6. Inadequate Record Retention Across Multiple Operational Areas

- ATH paragraph 6.5 – The Trust failed to retain records for the required minimum period, including:
 - Recruitment documentation
 - Pay and appraisal records
 - Leave and expense approvals
 - Procurement and contract records
 - Travel and subsistence evidence

Annex B: Hull Collaborative Academy Trust

Terms of Notice and Trust Requirements

Condition 1	<p>1. Governance and Financial Management Requirements</p> <p>1.1 Registers of Interests</p> <p>The trust must:</p> <ul style="list-style-type: none">• Maintain complete and accurate registers of all relevant business and financial interests for members, trustees, local governors and senior employees.• Ensure all close family and business relationships are consistently declared and recorded.• Review and update registers termly and retain them in accordance with ATH requirements. <p>1.2 Regularity, Propriety and Value for Money</p> <p>The trust must:</p> <ul style="list-style-type: none">• Demonstrate that public funds are used only for purposes intended by Parliament.• Evidence value for money through competitive procurement, appropriate benchmarking, and documentation supporting spending decisions.• Strengthen financial controls, including segregation of duties and formal approval processes. <p>1.3 Related Party Transactions (RPTs)</p> <p>The trust must:</p> <ul style="list-style-type: none">• Identify, record and manage all RPTs transparently and in line with ATH requirements.• Submit all reportable RPTs to SFSO for approval in advance. Retrospective approval requests will be treated as a breach.• Ensure RPT disclosures in financial statements are accurate and reconciled to underlying records.
Evidence required to show compliance with condition 1.1	<p>The trust must provide SFSO with:</p> <ul style="list-style-type: none">• The complete and accurate Register of Interest documenting all relevant business and financial interests for members, trustees, local governors and senior employees. This must be maintained by the trust and submitted to SFSO as changes occur.

	<ul style="list-style-type: none"> • The Register of Interest document must show how the trust will ensure all close family and business relationships are consistently declared and recorded. • A plan for how and when termly reviews and updates to registers will be conducted. Including how the trust plans to retain them in accordance with ATH requirements. This should be included within the same Register of Interest and its Document Retention Policy.
Timescale for condition 1.1	By 1/10/2026.
Evidence required to show compliance with condition 1.2	<p>The trust must provide SFSO with:</p> <ul style="list-style-type: none"> • Any minutes of Board/Finance Committees where spending decisions take place. These must evidence scrutiny of the trust's spending decisions. • An updated Internal Updated Financial Regulations / Scheme of Delegation showing compliant processes. • Scrutiny Report confirming improved controls and reduced risk. • A plan for how and when reviews and updates to these documents will be conducted.
Timescale for condition 1.2	<p>Board Minutes must be provided Monthly, for the Duration of the Ntl.</p> <p>Financial Regulations, Scheme of delegation and Internal scrutiny report to be provided by 01/10/2026.</p>
Evidence required to show compliance with condition 1.3	<p>The trust must provide SFSO with:</p> <ul style="list-style-type: none"> • An updated Related Party Transactions Policy. • RPT Register / Log listing all transactions, counterparties, values, and rationale. • Conflict of Interest Management Records (e.g., meeting minute extracts showing declarations and withdrawal from decisions).
Timescale for condition 1.3	<p>Updated Related Party Transactions Policy and RPT Register by 01/10/2026.</p> <p>Meeting Minutes to be provided Monthly of the duration of the Ntl.</p>

Condition 2	<p>2. Operational and Record-Keeping Requirements</p> <p>The trust must implement systems to ensure complete and compliant retention of:</p> <ul style="list-style-type: none"> • Recruitment documentation. • Pay, appraisal, leave and expenses records. • Procurement and contract documentation. • Travel and subsistence evidence.
Evidence required to show compliance with condition 2	<p>The trust must provide SFSO with:</p> <ul style="list-style-type: none"> • An updated Recruitment Policy. • An updated Pay Policy. • An updated Document Retention Policy. • A plan for how and when reviews and updates to these policies will be conducted.
Timescale for condition 2	<p>By 01/10/2026.</p>

Condition 3	<p>3. Delegated Authorities and Financial Oversight</p> <p>All delegated authorities described in the ATH are revoked. The trust must obtain prior approval from SFSO for:</p> <ul style="list-style-type: none"> • Special staff severance. • Compensation payments. • Debts and losses write-offs. • Guarantees, indemnities or letters of comfort. • Fixed asset disposals beyond FA limits. • Leasehold or tenancy agreements. • GAG carry-forward beyond limits. • GAG pooling. • Related Party Transactions. • Overseas travel. • Consultancy engagements.
--------------------	--

	<ul style="list-style-type: none"> • Use of trust property by non-trust entities.
Evidence required to show compliance with condition 3	<p>The trust must submit a request for approval for any actions relating to the delegated freedom revoked under the terms of the Ntl.</p> <p>Requests for retrospective approval will be deemed an ATH breach.</p>
Timescale for condition 3	For the duration of the Ntl.

Condition 4	<p>4. Governance Reform</p> <p>4.1 Conflict of Interest Management</p> <p>The trust must:</p> <ul style="list-style-type: none"> • Embed improved processes for identifying, recording and mitigating conflicts. • Ensure conflicted individuals do not take part in relevant decision making. • Clearly document conflict management decisions in meeting minutes. <p>4.2 Recruitment and Pay Controls</p> <p>The trust must ensure recruitment and pay decisions:</p> <ul style="list-style-type: none"> • Are transparent, documented and benchmarked. • Are free from nepotism and avoid perceived or actual conflicts. <p>4.3 Strengthening Board Oversight</p> <p>The trust must demonstrate improved trustee oversight of financial management and risk, with clear documentation of decisions and supporting evidence.</p>
Evidence required to show compliance with condition 4.1	<p>The trust must provide SFSO with:</p> <p>A Conflict of Interest Policy document setting out:</p> <ul style="list-style-type: none"> • How conflicts are identified. • How declarations must be made.

	<ul style="list-style-type: none"> Steps for mitigating or managing conflicts.
Timescale for condition 4.1	By 01/10/2026.
Evidence required to show compliance with condition 4.2	<p>The trust must provide SFSO with:</p> <ul style="list-style-type: none"> An updated Pay Policy. An updated Document Retention Policy.
Timescale for condition 4.2	By 01/10/2026.
Evidence required to show compliance with condition 4.3	<p>Trust members must undertake a lessons learned exercise to identify any missed opportunities to strengthen the members oversight of the trust board.</p> <p>The members must set out how they uphold the principles of effective governance by actively fulfilling the statutory responsibilities of a member, ensuring the academy trust operates in accordance with its charitable objectives and maintains high standards of accountability and performance. This evidence should include coverage of, but is not limited to:</p> <ul style="list-style-type: none"> How they contribute to the annual general meeting. Review and challenge the trust board’s performance through scrutiny of annual reports, financial statements and governance reviews. Exercise powers to appoint or remove trustees where necessary to uphold strong governance. Ensure the trust’s articles of association remain fit for purpose and initiate amendments when needed. Maintain independence from the trust board to provide objective oversight. Keep informed of relevant changes in education policy, charity law and governance best practices. Record and reflect on decisions made and their impact on the trust’s strategic direction. <p>The trust must conduct a full External Review of Governance and provide the report to SFSO. The trust must demonstrate action taken to implement the recommendations of the review and where identified any trustee or member skill gaps are filled through recruitment of highly competent and experienced individuals.</p>

Timescale for condition 4.3	By 01/1/2027.
------------------------------------	---------------

Condition 5	<p>5. Monitoring, Reporting and Assurance</p> <p>5.1 Action Plan</p> <p>Within 20 working days, the trust must submit an action plan setting out:</p> <ul style="list-style-type: none"> • How each requirement will be met. • Responsible leads. • Timescales. • Evidence to demonstrate compliance. <p>5.2 Monthly Reporting</p> <p>The trust must provide monthly written progress updates to SFSO including:</p> <ul style="list-style-type: none"> • Status against each action. • Risks or delays. • Relevant board papers or minutes demonstrating progress. • Monthly management accounts. <p>5.3 External Assurance</p> <p>SFSO require the trust to commission independent external reviews where progress is insufficient.</p> <p>The trust will need to conduct an internal scrutiny report and share this with the department and with its auditors.</p>
Evidence required to show compliance with condition 5.1	<p>The trust must provide SFSO with:</p> <ul style="list-style-type: none"> • An Action Plan of how it will address actions raised within these conditions.
Timescale for condition 5.1	By 28/07/2026

Evidence required to show compliance with condition 5.2	The trust must provide SFSO with: <ul style="list-style-type: none"> • An Action Plan of how it will address actions raised within these conditions with monthly updates. • Any minutes of Board/Finance Committees. • Monthly Management Accounts.
Timescale for condition 5.2	For the duration of the Ntl.
Evidence required to show compliance with condition 5.3	The trust must provide SFSO with: <ul style="list-style-type: none"> • An Internal Scrutiny Report.
Timescale for condition 5.3	By 01/10/2026

Condition 6	6. Conditions for Lifting the Notice The Ntl will be lifted once the Department is satisfied that: <ul style="list-style-type: none"> • All conditions have been fully met. • Improvements are embedded and sustainable. • Delegated authorities are safely restored.
Evidence required to show compliance with condition 6	Evidence to be reviewed on a monthly basis with the trust.
Timescale for condition 6	Monthly, for the duration of the Ntl.