Department for Education

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Plymouth CAST
Edmund Rice Building 21 Boniface Lane,
St Boniface College,
Plymouth,
PL5 3AG
Company Number: **08438686**
By email: [redacted]

18 September 2026

Dear [redacted]

Notice to improve: Plymouth CAST

I am writing to you in your capacity as the Chair of Plymouth CAST (the Trust), to inform you that the Department for Education (DfE) has assessed that the Trust's breaches of the Academy Trust Handbook (ATH) relating to governance and safeguarding are significant enough to warrant a Notice to Improve. On that basis, I am issuing the Trust with a Notice to Improve on safeguarding grounds. I understand that this decision may be disappointing and want to assure you that I recognise the strong engagement with Regions Group and the positive action the Trust has taken to date to address the concerns.

Our concerns to date include:

- Safeguarding standards are not consistently met, with Ofsted inspection evidence indicating weaknesses in safeguarding culture and practice which may place pupils at risk.
- The Trust has not consistently ensured that allegations against adults are managed in line with statutory requirements, including issues in escalation, referral processes and adherence to guidance.
- There are concerns about delays and inconsistencies in responding to safeguarding concerns, including instances where agreed actions with safeguarding partners have not been implemented in a timely manner.
- Leaders and those responsible for governance have not fully identified or addressed the extent of safeguarding weaknesses, indicating limitations in Trust-level oversight.

- The Trust has not yet demonstrated that learning from previous safeguarding incidents has been effectively embedded and sustained across the Trust. Whilst the trust has subsequently introduced, additional training, revised safeguarding processes, enhanced monitoring arrangements and safeguarding reviews, further assurance is required that these changes are operating effectively and preventing recurrence of similar issues.
- Internal review and assurance processes have not been fully effective, with weaknesses not consistently identified or addressed.
- Ofsted identified weaknesses in safeguarding records, allegations documentation and safeguarding information systems. Whilst the Trust has subsequently introduced strengthened recording, monitoring and quality assurance arrangements, further assurance is required that these arrangements are operating consistently and effectively.
- Inspection evidence highlighted inconsistencies in safeguarding culture, including feedback from some pupils indicating a lack of confidence in reporting concerns. Whilst the Trust has subsequently introduced measures intended to strengthen pupil confidence, trusted-adult arrangements and safeguarding communication, the Department requires further evidence that these improvements are embedded and sustainable.

[redacted]

Paragraph 1.1 of the ATH outlines the Board's roles and responsibilities:

Paragraph 1.1 Trusts perform an important role in advancing education, promoting pupil welfare and keeping trusts' estates safe and well-maintained. Trustees and management **must** have the skills, knowledge and experience to run the academy trust.

Paragraph 1.10 of the ATH outlines the Board's key purposes:

Paragraph 1.10. The academy trust is the legal entity with the board having collective accountability and responsibility for the academy trust and assuring itself that there is compliance with regulatory, contractual, and statutory requirements.

The academy trust board provides:

- strategic leadership of the academy trust: the board defines the trust vision for high quality and inclusive education in line with its charitable objects – it establishes and fosters the trust's culture and sets and champions the trust strategy including determining what, if any, governance functions are delegated to the local tier
- accountability and assurance: the board has robust effective oversight of the operations and performance of the academy trust, including the provision of education, pupil welfare, overseeing and ensuring appropriate use of funding and effective financial performance and keeping their estate safe and well-maintained
- engagement: the board has strategic oversight of relationships with stakeholders – the board involves parents, schools and communities so that decision-making is supported by meaningful engagement

Paragraph 1.11 of the ATH outlines trustees' responsibility to uphold the highest standards of conduct and ensure robust governance to support the effective management and oversight of the trust.

- The trustees must apply the highest standards of conduct and ensure robust governance, as these are critical for effective financial management. Trusts should consider the features of high-quality governance as described in the trust quality descriptions.

Paragraph 1.14 of the ATH outlines the trust board's safeguarding duties.

1.14 Academy trust boards have a duty to:

- safeguard and promote the welfare of children
- have regard to any statutory guidance on safeguarding, issued by the Secretary of State for Education
- ensure the suitability of staff, supply staff, volunteers, contractors and proprietors.

Given the seriousness of the concerns identified, and notwithstanding the improvement activity that has subsequently been undertaken by the Trust, the Department remains concerned that governance arrangements did not provide sufficient assurance that safeguarding duties under paragraphs 1.1, 1.10, 1.11 and 1.14 of the ATH were being discharged effectively at the point concerns arose.

I recognise the cooperation and extensive discussions that have taken place between the Trust and DfE officials. The Department also acknowledges the additional information provided by the Trust in its response to the Termination Warning Notice for Notre Dame, including evidence of strengthened leadership capacity, revised governance arrangements, safeguarding improvements and external review activity. Whilst these developments are welcome, the Department requires further evidence that these improvements are fully embedded, operating effectively and capable of being sustained over time. Accordingly, this Notice will remain in place until I am satisfied that appropriate and compliant safeguarding controls, assurance mechanisms and governance oversight arrangements are operating effectively across the Trust.

This letter and its annexes serve as a written Notice to Improve safeguarding at the Trust (Notice to Improve or "the Notice"). It reflects the findings from Notre Dame's no notice Ofsted inspection (25-26 February 2026) in addition to information shared with Regions Group by Plymouth City Council, and DfE's concerns on governance and oversight by the Board.

The Trust is required, pursuant to the provisions of the ATH and the Funding Agreement (FA), to comply with the terms of this Notice. These terms are set out in Annex A and Annex B.

We will monitor progress made towards meeting the requirements of this Notice. We will lift the Notice when the requirements set out in the annexes have been met in full.

We will support the Trust as it implements the required changes through regular contact and clear routes of escalation to resolve any questions or queries the Trust might have. However, if the Trust is unable to deliver the necessary improvement or fails to make sufficient progress against the original conditions, we reserve the right to issue a revised notice and add further specific conditions. Should it become evident that the Trust is unlikely to fulfil the conditions and / or requirements set out in this notice and / or within the agreed timescales, we will explore the contractual intervention options available.

If the Trust fails to meet the requirements of this notice, to the satisfaction of the Secretary of State, it 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 its 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.

I 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's 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 NtI on its website within 14 days of it being published on GOV.UK and retain it there until the NtI is lifted.

I recognise that this may be an uncertain time for the Trust and its staff. I am mindful of creating additional pressures on individuals involved. Therefore, we ask the Trust to ensure appropriate provision is in place to support all its staff, as necessary. You may find the Education staff wellbeing charter (https://www.gov.uk/guidance/education-staff-wellbeing-charter) helpful.

We will continue to keep clear and regular lines of communication open with you. As such, [redacted] will be in contact shortly to answer any questions you may have, and to discuss the next steps in more detail including any support the Trust may need to drive the necessary improvements. I look forward to hearing from you.

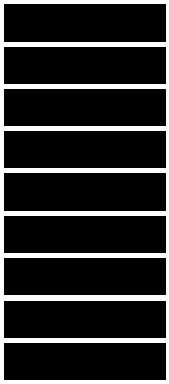
Yours sincerely



Lucy Livings
Regional Department for Education (DfE) Director, South West

CC.

[redacted]



PLYMOUTH CAST **Annex A**

Notice to improve

The Department for Education (DfE) has decided to issue a Notice to improve (the 'Notice') as a consequence of Plymouth CAST (the 'Trust'):

- Trustees and management did not demonstrate governance oversight and assurance arrangements that were sufficient to identify, escalate and address safeguarding weaknesses at the point concerns arose. As a result, the Trust failed to demonstrate the skills, knowledge and experience required to run the academy trust as set out in paragraphs 1.1, 1.10 and 1.11 of the Academy Trust Handbook (ATH). Consequently, the Trust failed to provide effective strategic leadership, robust oversight and accountability, and the high standards of conduct and governance expected of academy trust boards.

- The Trust also failed to meet its safeguarding responsibility outlined in paragraph 1.14 of the Academy Trust Handbook (ATH). The Board did not adequately discharge its duty to:
    - Safeguard and promote the welfare of children
    - Have regard to any statutory guidance on safeguarding, issued by the Secretary of State
    - Ensure the suitability of staff, supply staff, volunteers, contractors and proprietors

Conditions

The Trust is required to comply with all of the conditions set out in **Annex B**.

Governance requirements

The Trust is responsible for its own oversight, control and governance and is expected to take appropriate action to strengthen the weaknesses identified and return to compliance with the ATH.

The Trust should take all appropriate actions to ensure the action plan agreed with the DfE is fully implemented.

The DfE must be satisfied that the Trust is doing everything it can to rectify the weaknesses identified.

Monitoring and progress

The Trust is required to submit the evidence for the specific conditions to the timescales outlined in Annex B to enable the DfE to monitor compliance and progress.

Should it become evident that the Trust is unlikely to fulfil the conditions and / or requirements set out in this Notice and / or within the given timescales, the DfE will begin to consider and explore the contractual intervention options available.

Compliance and the end of the notice period

As outlined in **Annex B**, the Trust is required to submit evidence to demonstrate compliance with the conditions of this notice, which the DfE will use to monitor the Trust's progress. Annex B sets out the detail of the evidence required to fulfil the condition and the timescales to submit this evidence to the DfE.

When the Trust meets all the conditions outlined in this notice, is fully compliant with the most recent edition of the ATH and no other breaches have been identified, the DfE will write to the Trust to confirm that the notice has been lifted.

Annex B

PLYMOUTH CAST

Table of conditions

The table below summarises the conditions that have been placed upon Plymouth CAST ("the Trust"). It sets out the evidence the Trust must provide, and the timescales the Trust must meet, to show that it has complied with the notice to improve (" the notice"). All conditions set out in the table must be met before the notice can be lifted.

Condition	Evidence required to show compliance with the notice	Timescale
1. The Trust must share its Internal Safeguarding Review that was undertaken in 2022 and any associated safeguarding action plans that were produced as a result of the review.	The Trust must supply DfE with: • A copy of the Trust's internal review. • A copy of any associated implementation plans. • Details of any recommendations and when they were completed. • Details of any actions that have not yet been completed and reasons as to why they have not been completed.	10 days from the issue of NtI (not including school holidays). Deadline: **Friday 2 October.**
2. The Trust must share the outcome and report for the Independent Review of Safeguarding for Notre Dame RC School and St Boniface's RC College which was undertaken in June 2026. • The Trust must consider in full all recommendations set out in the independent review once it has concluded. • The Trust must share any associated safeguarding plans to implement the recommendations.	The Trust must supply the DfE with: • A detailed implementation plan, setting out how each recommendation will be addressed, by whom, and by when, and • Termly evidence of progress, and written justification where the Trust has not chosen to implement a particular recommendation (see below). • The Trust must also provide termly evidence of implementation, impact and Board oversight of recommendations arising from the review, including evidence of how effectiveness if being measured and validated.	A copy of the report must be shared with the Department within 10 days from the issue of the NtI Deadline: **Friday 2 October.** Implementation plans must be submitted to the Department within 10 working days from the issue of the NtI Deadline: **Friday 2 October.** Termly evidence/ monitoring until the NtI is lifted.

	If the Trust decides not to implement any recommendation, in whole or in part, the Trust must provide the department with a written justification, demonstrating: • the rationale for the decision; • how the Trust has assured itself that the alternative approach sufficiently mitigates the safeguarding, operational or leadership risks identified; and • How the Trust will monitor and evaluate the effectiveness of its chosen approach.	
3. The Trust must commission a Trust-wide external review of governance to identify any gaps and recommendations for improvement. The terms of reference of the review and the outcome must be shared with the DfE. The scope of the review should include, but not be limited to: • Trust governance arrangements, as a minimum: • Governance structure and roles, clarity of delegated authority, scheme of delegation, separation of strategic governance from operational management and roles of members and effectiveness of oversight • Board effectiveness, skills, diversity and succession planning, recruitment and induction of directors, attendance and engagement, quality of challenge to executive leaders. • Strategic leadership, board involvement in setting vision and strategy, monitoring delivery of strategic objectives, use of key performance indicators and data. • Oversight of safeguarding, how directors monitor safeguarding across the Trust, and how directors understand and identify trends, and scrutinise cases.	The Trust must submit a copy of the remit for review to be agreed by DfE, evidence of procurement and commissioning, and share report/fundings with the DfE Once the review has concluded, the Trust must supply DfE with: • A detailed implementation plan, setting out how each recommendation will be addressed, by whom, and by when; and • Termly evidence of progress, and written justification where the Trust has not chosen to implement a particular recommendation.	A Trust-wide review must be commissioned 6 weeks from issue of NtI (not including school holiday period) • A copy of the review must be shared with the Department within 5 working days of receipt by the Trust. • Implementation plans must be submitted to the Department within 10 working days of the receipt by the Trust. • Termly evidence/ monitoring until the NtI is lifted. Deadline for review to be commissioned: **Friday 6 November**
4. Ensure proper arrangements are in place, whereby the Trust board has the appropriate skill set and processes in place to challenge and hold to account the safeguarding leads and other	Provide evidence to DfE of: • Effective monitoring and quality assurance, showing how the Trust	4 weeks from issue of NtI (not including school holiday period). Deadline: **Friday 16 October**

members of the Senior Executive Leadership Team (SELT) and evidence this to DfE.	routinely checks that safeguarding practice is implemented, consistently, accurately and in line with statutory requirements by **Friday 16 October 2026.**	
5. The Trust must ensure that: • All those involved with recruiting staff to work with children have completed the Safer Recruitment training. • Recruitment policy and procedures include measures set out in part 3 of KCSIE. • There are effective arrangements for performing statutory checks on staff and Trustees, and the chair complies with the requirement to obtain a suitability check from DfE, as requires by the Education (Independent School Standards) Regulations 2014. • A single central record of pre-appointment checks is maintained (KCSIE para 250-254).	The Trust must submit recruitment training records and, if appropriate, a revised policy for staff checks/records, approved by trustees, to DfE by **Friday 16 October 2026.**	4 weeks from issue of NtI (not including school holiday period). Deadline: **Friday 16 October**
6. The Trust must demonstrate that allegations against adults are managed consistently and in accordance with KCSIE and local safeguarding procedures.	The Trust must provide: • Evidence of revised allegations-management procedures. • Evidence of staff training • Evidence of Board scrutiny of allegations-management arrangements and organisational learning arising from cases.	8 weeks from issue of the NtI, with termly monitoring thereafter. Deadline: **Friday 13 November.**
7. The Trust must ensure that all Designated Safeguarding Leads (DSLs) and deputy DSLs: • Undertake appropriate and up-to-date safeguarding training, including training aligned with the latest Keeping Children Safe in Education (KCSIE) statutory guidance. • Evidence a systematic cycle for reviewing safeguarding training, ensuring that it is refreshed at appropriate intervals and updated when statutory guidance changes. • Ensure that information gathered through safeguarding activity is consistently and accurately fed back into each	Provide evidence to DfE of effective monitoring and quality assurance, showing how the Trust routinely checks that safeguarding practice is implemented consistently, accurately, and in line with statutory requirements, by **Friday 16 October**	4 weeks from issue of NtI (not including school holiday period). Deadline: **Friday 16 October**

Trust school's safeguarding systems, including recording-keeping platforms and internal reporting structures. • Ensuring safeguarding practice is fully compliant with all requirements set out in KCSIE, including by not limited to: Information sharing Record-keeping Early identification of risk Inter-agency working Leadership oversight and accountability.		