



# **Local Child Safeguarding Practice Review**

**Mossbourne Victoria Park Academy**

**December 2025**

Sir Alan Wood CBE

# Personal Statement

While this Local Child Safeguarding Practice Review has been conducted with complete independence, for the purposes of full transparency and reassurance, it is important to clarify my historical connection to one school within the Mossbourne Federation.

From 2002 to 2012, I served as Chief Executive of The Learning Trust in Hackney. The Trust was responsible for all of Hackney's statutory education services, following a directive from the Secretary of State for Education.

In this capacity, I was instrumental in establishing Mossbourne Community Academy, Hackney's first academy. During that time, I collaborated closely with its founder, Sir Clive Bourne, and the founding Principal, Sir Michael Wilshaw. This involvement is well-documented, and I am confident that it has not influenced the objectivity of my findings as they pertain to this review and Mossbourne Victoria Park Academy.

My work has been guided exclusively by the evidence and research undertaken for this review. Furthermore, oversight and scrutiny have been provided by a defined Case Review Panel, established by the City and Hackney Safeguarding Children Partnership (CHSCP) and chaired by the CHSCP's Independent Safeguarding Children Commissioner, Jim Gamble QPM. This has provided a further safeguard to ensure the integrity of the review process.

A handwritten signature in black ink, appearing to read 'Alan Wood', with a stylized, cursive script.

Sir Alan Wood CBE

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# 1. The Background to the Review

- 1.1 Between February and November 2024, a number of parents expressed concerns regarding their children's experiences at Mossbourne Victoria Park Academy (MVPA). They believed these experiences suggested widespread and long-term abuse of their children. An initial dossier outlining these concerns was compiled and shared with Hackney Council. The accounts within the dossier were anonymised on the basis that those involved feared the consequences of engaging directly with MVPA.
- 1.2 Initially, the Council led the response to these concerns, with the CHSCP maintaining a 'watching brief' on the response by engaged agencies. At the time, the Council's approach was supported, as were its attempts to encourage parents to engage with the school. The Department for Education (DfE), Ofsted, and MVPA were all involved in discussions with the Council about the best way to respond. Despite these efforts, no significant progress or satisfactory resolution was achieved.
- 1.3 Over the following weeks, several articles appeared in the national media. These initially focused on the concerns that had been raised, although an open letter supporting the school and signed by over 300 parents was also published. In response to the first article in late November 2024, the Mossbourne Federation stated: '*We were saddened to read these accounts as we do not recognise the characterisation of the school.*' In its response to the second article in early December 2024, the Federation stated it believed it was being '*targeted by a vexatious campaign.*'
- 1.4 Around the same time, a website called '*Educating Hackney*' was launched. Created by some of the parents who had raised the initial concerns, and supported by an elected member at Hackney Council, its stated purpose was to '*draw attention to links between the way behaviour policies are implemented in some schools, and potential consequences for children's wellbeing, including their mental health and school attendance.*' The site provided a platform for people to share their experiences and testimonies.
- 1.5 The website's release led to substantially more concerns being raised about schools within the Federation. Consequently, an extraordinary meeting of the CHSCP's Case Review sub group was convened on 10 December 2024. The purpose of this meeting was to gather the facts, determine if any immediate action was required, consider the

potential for learning and to determine whether a Local Child Safeguarding Practice Review (CSPR) should be commissioned.

- 1.6 At this meeting, participants from safeguarding partners and relevant agencies of the CHSCP unanimously recommended that a CSPR should be undertaken. In line with the CHSCP's written safeguarding arrangements, the Independent Safeguarding Children Commissioner subsequently decided to instigate the review. This decision was then ratified by the statutory safeguarding partners of the CHSCP Executive group on 11 December 2024.

## **The Review's Rationale**

- 1.7 Although the criteria for a Serious Incident Notification to the national Child Safeguarding Practice Review Panel had not been met, safeguarding partners determined that the circumstances constituted a 'serious child safeguarding case' based on the volume and detail of the concerns.
- 1.8 A serious child safeguarding case is defined as one where abuse or neglect of a child is known or suspected, and the child has died or been seriously harmed. In making this determination, the following definitions from the statutory guidance, Working Together to Safeguard Children 2023 (WT23), were considered relevant:
- A 'serious child safeguarding case' as outlined in paragraph 328.
  - 'Serious harm' as set out in paragraph 329.
  - 'Abuse' as defined in the glossary on page 154.
  - 'Maltreatment' as defined in the glossary on page 160.
- 1.9 More specifically, the concerns identified numerous incidents where children were reported to have been ill-treated, causing harm to their health, development, and dignity. Those raising them were parents / carers of current and former pupils, teachers and ex-teachers of schools within the Federation, professionals from a range of disciplines and former pupils.
- 1.10 Some reports referred to an excessive emphasis on strict discipline within the Federation, describing the actions of school leaders and teachers as cruel and detrimental to pupils' mental health and emotional wellbeing. Others reported the use of bullying, harassment and intimidation tactics by teachers, including shouting, public humiliation, and verbal abuse. Policies and practice regarding uniforms, toilet breaks, and social interaction were also criticised as being overly harsh and restrictive.

- 1.11 There were concerns expressed about inadequate support for pupils with mental health needs, with reports of teachers ridiculing or dismissing their concerns. Schools within the Federation were accused of failing to make reasonable adjustments for those with Special Educational Needs or Disabilities (SEND), mental health issues, or challenging circumstances. Concerns surfaced about discriminatory practices based on race, sex, disability, and socio-economic background. Some reported that their experiences had resulted in a lasting and negative impact on their lives, affecting their mental health, confidence, and academic performance.
- 1.12 In reaching their decision to ratify the review, safeguarding partners also referred to paragraph 338 of WT23, which provides the authority to initiate a CSPR even when no Serious Incident Notification has been made.

*'In some cases, a 'serious child safeguarding case' may not meet the criteria for a serious incident notification but may nevertheless raise issues of importance to the local area.....Safeguarding partners may choose to undertake a local child safeguarding practice review in these or other circumstances, in which case they should be clear about their rationale for undertaking such a review and what its focus will be.'* p338 WT23

### **The Child Safeguarding Practice Review Panel**

- 1.13 On 16 December 2024, the Independent Safeguarding Children Commissioner wrote to the Child Safeguarding Practice Review Panel formally sharing the details of the concerns that had been raised and the rationale for triggering the CSPR. The Panel considered this communication at its meeting in January 2025. It confirmed the following:

*'We noted the background to this decision and understand the rationale for undertaking this review. As you note, this is a decision that safeguarding partners are able to take within national guidance in Working together to safeguard children 2023.'*

### **Terms of Reference and Methodology**

- 1.14 The CHSCP agreed and published the Terms of Reference that required my review to cover two phases:
- Clarifying and then determining if the concerns / reports can be substantiated.
  - Identifying any lessons concerning the application of behaviour policies and their impact on students, families, staff and the wider school community.

- 1.15 Noting that the concerns submitted referenced a range of Mossbourne schools, my review proceeded with a proportionate approach pursuant to its original aims. Consequently, this report has concentrated on the circumstances as they relate to MVPA. That said, where I have made recommendations, these should be considered by the Federation as being applicable to its entire cohort of schools. Other schools within the CHSCP's footprint and beyond should also reflect on the review's findings.
- 1.16 When determining whether the concerns could be substantiated, the Terms of Reference were clear that '*substantiation*' would be for the '*purposes of the review*'. This is an important point to highlight. It meant that it was not my task to investigate and singularly prove or disprove each of the reported concerns, rather it was to decide, based on a balance of probabilities, whether any specific incidents and/or themes of practice were likely to have happened. When considering this balance, I have taken account of factors such as the nature of the concern, its reported severity and frequency, the credibility of the information, and its relevance to organisational policies and government guidance.
- 1.17 This approach is entirely in line with statutory guidance and reinforced by the fact that my review was not undertaken to hold individuals, organisations, or agencies to account. There are other processes for that purpose and for which a different burden of proof would apply. The aim of my review has been to identify learning and make recommendations to prevent or reduce the risk of recurrence of any similar incidents / issues in the future.

## **Response by the Federation and MVPA**

- 1.18 From the outset, many within the leadership at both the Federation and MVPA refuted there was any basis for concern and repeatedly challenged the justification for the CSPR. Their stance in this respect is evidenced in the communications sent by MVPA to parents/carers, the numerous correspondence between the Federation's solicitors and the CHSCP, minutes of Federation meetings, feedback I received from teachers (about comments made by senior school leaders at staff briefings), and my own interviews with governors and leaders.
- 1.19 Publicly, school leaders stated they did not recognise the school's portrayal, dismissing the concerns as vexatious and arguing the review was being driven by a '*broader cultural debate about discipline in schools*'. This was similarly reflected during internal Federation meetings, where the "*ongoing reputational risk of vexatious and troublesome complaints*" was discussed in late November 2024. While I am aware

that reassurance was provided to the Federation about the review being proportionate, balanced and fair, its completion has been challenging across several areas.

- 1.20 Following the distribution of the review's Terms of Reference, the Federation ceased all direct communication with the Independent Safeguarding Children Commissioner (acting on behalf of the statutory safeguarding partners) and the CHSCP team. All subsequent engagement with the CHSCP was conducted solely through the Federation's solicitors. The Federation rationalised this change by stating its belief that certain aspects to the CSPR "*rendered its conduct unfair*" and that there was a lack of "*due process.*" Notwithstanding any organisation's right to seek legal counsel, this decision created a degree of delay and reflected a continuation of the adversarial approach that marked the beginning of the review.
- 1.21 The CHSCP was also required to firmly reject the Federation's repeated requests for disclosure of the individual, confidential accounts submitted as part of the review. The Federation argued that disclosure was necessary and that the CHSCP had "*an obligation at common law to secure the procedural fairness of the review, of which a fundamental aspect is disclosing to the body which is the subject of the review the case against it.*"
- 1.22 The CHSCP maintained that the legal basis for withholding disclosure was secure. It provided reassurance that none of the concerns indicated a child was at risk of suffering significant harm, nor did they require immediate action regarding any member of staff. A summary of the testimonies submitted through the Educating Hackney website (that had been shared by individuals with the express understanding that their information would not be disclosed to the Federation) was subsequently provided. The CHSCP was clear that disclosing the full information was unnecessary for the CSPR to progress and could potentially prejudice the review's findings.
- 1.23 Furthermore, while noting the Federation's repeated agreement to co-operate with the review, challenges were also experienced in receiving information originally requested by the CHSCP in January 2025. This information was essential for my research, and much of it, I would have expected to be easily retrievable. Accepting that some delays are perhaps inevitable and often dependent on the sufficiency of an organisation's IT systems, the Federation's approach to redacting documentation is relevant to highlight.
- 1.24 Explaining further, the CHSCP's request for information was made under section 16H of the Children Act (CA) 2004 and the guidance issued on pages 35 and 36 of WT23.

It was made for the purpose of enabling or assisting the performance of functions conferred on safeguarding partners by the CA 2004, one of which includes CSPRs. Under Section 16H (2) CA 2004, the Federation and MVPA had a duty to cooperate and a statutory requirement to comply with this request.

- 1.25 However, while requiring that the material be shared in an unredacted form, the Federation repeatedly refused to do so until late September 2025. From the CHSCP's perspective, it was clear that it was never for the Federation to determine what was or was not relevant for my review and that any judgement in this regard was mine to make.
- 1.26 The Federation's ultimate change of position on this matter was appreciated, although the eight-months delay was both inadequate and entirely unnecessary. This, and the late sharing of other documentation by the Federation, was significant to the CSPR surpassing its statutory timeframe.
- 1.27 Another example of the Federation's response to the CSPR was its handling of a seemingly straightforward data request. When asked for information on permanent exclusions, the Federation replied "*The Federation academies do not have permanent exclusions; only exclusions and suspensions. Please provide further detail on what reports are being requested.*"
- 1.28 This response was notably surprising, especially since the reports by MVPA's Principal and all the previous data submitted by the Federation had used the term permanent exclusions throughout. For anyone working in education, permanent exclusion is not an unfamiliar term and will be clearly understood; thus, the sudden linguistic distinction appeared to be, in my view, a deliberate attempt to sidestep or delay the request.
- 1.29 Also necessary to highlight is the fact that, in April 2025, the CHSCP advised the Federation that it had received information from an existing member of staff that a senior teacher at MVPA had "*been going back through multiple documents and revising their content since the Safeguarding Review was announced.*" I was unable to test the veracity of this allegation, although the Federation responded: "*In the absence of any detail regarding this allegation, or supporting evidence, our Client does not recognise the behaviours that you have described, particularly given the manner in which MVPA's digital records function. In any event, MVPA has made efforts to ensure that relevant information is locked down.*"

- 1.30 Finally, four working days after the CSPR was instigated, the Chair of the Central Federation Board (CFB) confirmed the Federation's intention to instruct a King's Counsel to undertake an "*parallel internal review*", a step reportedly taken on the advice of the DfE. I understand that the commissioning of this review and its oversight (focusing on complaints processes) was subsequently taken over by the Members of the Mossbourne Federation, distinct from the CFB. Members were also the recipients of the final report.
- 1.31 In July 2025, the Independent Safeguarding Children Commissioner criticised the decision for this review, communicating the following via the Federation's solicitors: "*Furthermore, while the appropriate use of public funds is an issue for the Federation, it was highly unusual (and in my view unnecessary) for the Federation to engage a legal firm to act as its single point of contact for the review. Moreover, despite me articulating my concerns about the King's Counsel (KC)-led internal review and the potential for it duplicating the work of the statutory review, this was nonetheless commissioned by the Federation.*"

## 2. Executive Summary

- 2.1 This independent review was commissioned to investigate widespread concerns regarding the implementation of the behaviour policy at MVPA. The central challenge it addresses is the stark contrast between the school's demonstrable success - exemplary academic results, strong attendance, and fervent support from most parents - and serious, persistent concerns being raised from a wide range of stakeholders about a harsh and damaging disciplinary culture.

### The Core Finding: Success, But Not for All

- 2.2 The review concludes that the concerns raised about practices such as shouting, public humiliation and a lack of reasonable adjustments can be substantiated. A defensive and dismissive leadership culture has refuted these concerns, branding them as "*vexatious*", and has prioritised academic reputation over engaging with criticism.
- 2.3 While these practices have the potential to impact any pupil, for a significant minority who are more vulnerable, have Special Educational Needs and Disabilities (SEND), or struggle to conform to an inflexible system, the school's approach to discipline has been particularly harmful.

### Key Evidence

- 2.4 My findings are based on a triangulation of evidence from the following:
- 342 individual reports from parents, pupils, and staff involving concerns relating to a range of schools within the Federation.
  - 73 specific accounts focused on MVPA that fell within the parameters of the review's Terms of Reference.
  - Testimony from current and former teachers describing a "*climate of fear*," institutionalised shouting, and practices designed to humiliate pupils.
  - Surveys from pupils and parents revealing that a substantial minority do not feel safe, happy, or believe bullying is handled effectively.
  - Concerns from external agencies about the school's inflexible approach, disproportionate sanctions, and the high volume of mental health referrals.
  - Ofsted reports, media reports and documentation / data provided by the Federation (such as policies, records of rewards / sanctions, minutes and reports).

## Specific Practices and Issues of Concern

2.5 The review identified several key areas where practice was substantiated as being of concern, with some of it conflicting with the DfE's guidance on managing behaviour in schools:

- **Shouting.** This was found to be a routine, not exceptional, practice. Shouting has been used at MVPA in a manner that humiliates and intimidates pupils.
- **'Desking'.** Pupils are placed at desks in corridors as a punishment for minor infractions. This is isolating, shaming, and educationally unproductive, with no data collected to monitor how this sanction is used, its effectiveness and whether there is any disproportionate impact.
- **Behaviour & SEND.** A rigid application of the behaviour policy at MVPA sometimes fails to make reasonable adjustments for pupils with SEND, leading to them being punished for behaviours stemming from their conditions.
- **Mental Health.** Some practitioners consider that MVPA's uncompromising culture on academic success and its approach to behaviour are leaving needs unmet and exacerbating mental health issues in pupils.
- **Behaviour Support Unit (BSU) & Alternative Provision Centre (APC).** These units seem to function more as containment than rehabilitation, lacking specialist staff and a clear therapeutic or educational framework to address underlying needs.
- **Disproportionality.** Beyond suspensions and permanent exclusions, there is no evidence that senior school leaders or governors have routinely analysed the significant volume of data held on the other sanctions that MVPA issues to pupils. Moreso, there is no evidence that this data is being considered in the context of protected characteristics or through an 'anti-racist' lens - to ensure duties are being met under the Equality Act 2010. My evaluation of the data indicated that some ethnic groups and children with SEND are disproportionately impacted by sanctions based on their population sizes.
- **Training on Behaviour Policy Implementation** - While senior school leaders at the Federation and MVPA have set the tone for how the behaviour policy should be applied, they have been largely ineffective in making sure the workforce are equipped to implement it properly.
- **Leadership, Accountability and Governance.** Senior school leaders spoke of a culture of rigidity with flexibility, although the evidence from my review points towards one where '*No Excuses*' has been actively promoted as zero tolerance and '*punishment no matter what*'. The approach of senior leaders in prioritising strictness has superseded all else, with an accompanying attitude that practice is

beyond reproach as pupils get good grades. Furthermore, governance arrangements have failed to provide effective oversight of the implementation of the behaviour policy. A passive approach, and a distinct lack of curiosity by governors has meant they have neither demanded nor scrutinised data on sanctions. Overall, they appear to have been lulled into inaction by strong academic results and confused excellent outcomes in this context, with excellent practice for every child.

- **MVPA's response to complaints.** The complaints procedure is perceived by some parents and carers as a defensive shield that routinely dismisses serious concerns through poor communication and a culture of intimidation. This approach is seen as prioritising policy protection over accountability and pupil welfare. I saw no evidence of senior leaders or governors probing any complaints data and using this to help reflect on its arrangements.
- **The management of allegations against staff and volunteers.** Despite good written safeguarding practices and positive engagement with the LADO, there is limited oversight of this activity by governors. There is also a need to ensure the internal arrangements avoid conflicts of interest and are impartial.

## Conclusion and Explanation of the Paradox

- 2.6 The paradox of outstanding results alongside deep distress can be explained by a culture that prioritises compliance and control above all else. The school's leadership has created a structured environment that can be positive for those who can navigate its strictures. However, this same system is implemented with a rigidity and a lack of differentiation that does not protect the wellbeing of a vulnerable minority.
- 2.7 The leadership's defensive posture and the failure of governors to hold them accountable have allowed harmful practices to persist unchecked. In essence, the review finds that MVPA's success has been achieved at too high a cost for some pupils. The path forward requires the Federation to balance its academic rigour with greater flexibility, compassion, and a governance system that ensures the school's culture is nurturing and safe for every pupil.

## 3. The Concerns

### An Overview of the Accounts

- 3.1 342 reports detailing various concerns about schools within the Federation had been collated and shared with the CHSCP by the end of January 2025. This was the agreed deadline for any concerns to be factored into my review. For all those sharing concerns, they had done so under the proviso that their information would not be shared with anyone within the Federation.
- 3.2 Of the 342 reports, 268 were submitted by those providing their names and contact details. A total of 134 reports specifically related to MVPA, with 103 people consenting to engage with the review process should the need arise. 73 of the reports regarding MVPA involved incidents or issues that had occurred within the last five years, the timeline covered by the CSPR. It was these cases that formed the core basis for my analysis.
- 3.3 The accounts submitted came from a variety of sources, including current and former teachers and staff at MVPA, ex-pupils, parents and carers, and other professionals. A thematic analysis of the accounts identified five key areas of concern. I have summarised each with a small sample of quotes to help explain how these issues were reported to have been experienced.

### Leadership

- 3.4 Significant concerns regarding MVPA's leadership centred on reports of a toxic and harmful environment for both pupils and staff. This culture was allegedly driven by an excessive focus on discipline and academic achievement by the school's senior leaders, creating an atmosphere of fear and intimidation. Specific issues raised included an authoritarian approach, with teachers reportedly pressured to adopt harsh methods, alongside claims of staff facing bullying and unreasonable expectations. Further concerns highlighted a disregard for pupil well-being and mental health in favour of academic outcomes, and a perception that leadership was unresponsive to these issues. Additionally, discriminatory practices, particularly against Black boys and pupils with SEND, were reportedly prevalent. Finally, reports pointed to a significant lack of accountability and transparency in decision-making processes.

*"During my time at the academy, I witnessed a deeply troubling culture that prioritised maintaining 'healthy fear' among students. This term, 'healthy fear,' was explicitly used*

*as the title of training sessions provided to staff, where we were instructed on methods to ensure that children remained intimidated."* (Teacher)

*"It was frequently made clear to teachers by the SLT that empathy was considered a weakness, and that raising your voice was a requirement. The 'tough love' message was reinforced in assemblies and in person by imagery of a red fist and heart."* (Teacher)

*"It is our opinion that the senior leadership of MVP has been in denial for years about the harm and abuse being caused to children in their care."* (Other Professional)

*"I don't think I was ever spoken to in anything other than a raised voice by the SLT, but this wasn't just me – many teachers were regularly shouted at."* (Teacher)

## **Harsh Disciplinary Environment**

- 3.5 Reports noted an excessively punitive disciplinary environment at MVPA that was detrimental to pupils' well-being. They referenced the frequent use of shouting and public humiliation for minor infractions, creating a hostile atmosphere. Concerns were repeatedly raised that this strict discipline was disproportionately applied to Black boys and pupils with SEND. The use of detentions and other sanctions was criticised as being overly frequent, often lasting late, and unfairly applied to certain pupil groups. Other harsh measures that were reported included the use of isolation (such as in 'isolation units' or by being 'desked') and high rates of exclusions, often for minor issues and again, disproportionately affecting Black boys and pupils with SEND. Less frequent reports also raised concerns about physical punishments, such as forcing pupils to stand in the rain or physically restraining pupils.

*"The verbal canning needs to stop. The children were not the bullies, but it was the teachers who were the bullies to the children."* (Parent)

*"Regardless of how draconian one might find the schools policy, the lack of flexibility in its application to an autistic 11-year-old is very concerning."* (Other Professional)

*"I mean we get an email from our head of department every week that has a league table that shows of the people in the department that says winner next to it if you've given enough sanctions."* (Teacher)

*"It felt brutal – everything was based on threats, both for students and teachers."*  
(Teacher)

### **Lack of Support for Pupil Wellbeing**

- 3.6 There were serious concerns expressed about a lack of support for pupil wellbeing. The school's heavy emphasis on academic achievement and strict discipline was reportedly coming at the expense of some pupils' mental, emotional, and social health. The school was reported as prioritising academic results above all else, leading to intense pressure and a deficit of support for pupils who are struggling. A significant concern was the absence of adequate pastoral care. Pupils who were experiencing difficulties reportedly had their concerns dismissed or minimised, with this being attributed to a general lack of understanding of mental health among staff. The school's punitive disciplinary approach was consistently highlighted as a major factor in creating a stressful and unsupportive environment that discouraged pupils from seeking help.

*"The majority of students who attend this school really struggle with the transition from primary school to MVPA and I agree with each parent who has raised concerns because mental health is a thing and what is education if the student is unable to access education due to fear..."* (Teacher)

*"The mental health of students was seen as secondary to their academic outcomes."*  
(Teacher)

*"My child is attending Mossbourne Victoria Park Academy. He is absolutely petrified to speak to staff; he doesn't drink water because of lack of toilet time."* (Parent)

*"Many of the young people have SEND (diagnosed and undiagnosed) and we have experienced over and over the complete lack of willingness by the school staff to make any adjustments required for the child to attend or thrive in the school."* (Other Professional)

### **Discriminatory Practices**

- 3.7 The reports highlighted specific concerns about discriminatory practices based on race, disability, and gender. Racial discrimination centred on the experiences of Black pupils, particularly Black boys, who were reported to face disproportionate punishments, racialised language and microaggressions. Disability discrimination was raised as an issue for pupils with SEND. They were reportedly being punished for behaviours directly linked to their needs / disabilities. Furthermore, concerns were

expressed about the failure to implement or effectively discharge Education, Health and Care Plans (EHCPs). Reports of gender discrimination mainly focused on female pupils. Key issues included a restrictive toilet policy that adversely affected menstruating girls, as well as accounts of sexist comments and attitudes from teachers.

*"White middle class children were often treated with more understanding, compassion and flexibility than black working-class children." (Teacher)*

*"Students with any semblance of 'behavioural issues' who were often of SEND status would miss out on so much lesson time because as teachers put it 'education is a privilege'..." (Ex-Pupil)*

*"Black working class boys were routinely treated more harshly than other members of the school community..." (Teacher)*

*"One such report concerned a specific teacher who had a habit of addressing African Caribbean boys as "boy". (Parent)*

### **Poor Communication and Dismissal of Concerns**

- 3.8 Reports consistently highlighted serious issues with MVPA's poor communication and a general lack of responsiveness. There were concerns about parents and pupils feeling unheard and unsupported, noting that complaints were frequently dismissed or ignored. Communication from the school was described as being sparse, with emails and calls going unanswered. School leaders were characterised as unwilling to engage in meaningful dialogue, which made open discussion extremely difficult. Furthermore, difficulties in accessing information on policies and procedures fostered a perceived lack of transparency. Overall, communication was seen as one-sided, with the school's approach to dictating expectations without seeking input, significantly eroding trust.

*"My child started at MVPA confident and conscientious... Our concerns and complaints were always dismissed." (Parent)*

*"Absolutely no complaint we have ever supported has been upheld and families feel completely helpless with no other avenues of complaint." (Other Professional)*

*"I am concerned that I repeatedly raise matters... and every single time I tried to engage the school about that whether in writing or by telephone I am not communicated with and seemingly ignored." (Parent)*

*"As a parent I am kept in the dark about serious matters, including where my child is. The lack of communication is distressing and leaves me worried for their safety." (Parent)*

### **Impact on Pupils**

- 3.9 The school's practices and environment were reported to have a profound negative impact on some pupils. Specific concerns included ill-treatment, excessive punishments, humiliation, and discriminatory practices. This environment was directly implicated in poor mental health outcomes, such as increased anxiety and depression, alongside alarming reports of self-harm and suicidal ideation. The harsh disciplinary regime was cited as a major contributing factor, with methods designed to humiliate and disrupt learning. For some, this led to a loss of motivation and resentment rooted in constant criticism and a fear of failure. Additionally, the environment reportedly damaged pupils' social and emotional well-being, causing social isolation, relationship difficulties, low self-esteem, and a strong distrust of authority.

*"I was severely struggling with my mental health... I would be punished for struggling and it would only make matters so much worse." (Ex-Pupil)*

*"During year 9 I started to self-harm because the teachers made me feel as though I didn't deserve to live because of my grades." (Ex-Pupil)*

*"My child's therapist feels that with the trauma they still carry due to their treatment at MVPA they may never be able to return to education." (Parent)*

*"It has taken him a considerable amount of time to unlearn the fear instilled by the school." (Parent)*

## 4. Context

### **The Mossbourne Federation of Academies and MVPA**

- 4.1 The Mossbourne Federation is an established group of high-performing schools based in Hackney, London. It was established with the goal of providing outstanding education to pupils in an area that historically faced educational challenges.
- 4.2 Mossbourne Community School was built on the site of the Hackney Downs School which closed in 1995. In 2002, the Secretary of State directed Hackney Council to outplace its statutory function for education to The Learning Trust, a purpose-built not-for-profit organisation, for a period of ten years. The Learning Trust developed an academies plan for secondary education in Hackney. Phase one was the agreement to develop Mossbourne Community Academy (MCA) in 2004. This academy was sponsored by Sir Clive Bourne. It was one of the first to be built under the national academy programme, which aimed to replace failing schools with institutions focused on high academic standards and strong discipline.
- 4.3 MCA gained national prominence under the leadership of Sir Michael Wilshaw, who became the founding Principal. His focused discipline policies and emphasis on academic excellence led to the school becoming one of the best-performing state schools in England. Following the success of the original academy, the Mossbourne Federation was formally established, expanding to include MVPA, Mossbourne Riverside Academy (primary school) and Mossbourne Parkside Academy (primary school).
- 4.4 MVPA opened on the refurbished site of Cardinal Pole Secondary School in September 2014. It has since demonstrated a strong commitment to academic excellence and has consistently achieved impressive results. In the 2023/2024 academic year, pupils GCSE outcomes were as follows:
- 81% of all grades were at grade 5 or higher.
  - The average grade was 6.48.
  - 93% of pupils achieved a grade 4 or higher in both English and Mathematics.
  - 49% of all grades were at grade 7 or higher.
- 4.5 In late 2024, the Federation expanded its operations by taking over three schools in Thurrock, Essex, previously managed by the Ortu Federation. The schools involved in

this transition were Hassenbrook Academy, Gable Hall School, and Corringham Primary School.

## Accountability and Governance

- 4.6 The accountability framework of the Federation is a multi-layered system designed to ensure effective governance and maintain high educational standards. It operates through a hierarchical structure, from the ultimate constitutional guardians to the operational management of each academy.
- 4.7 The Members of the Mossbourne Federation are the ultimate custodians of its constitution. They possess the authority to appoint and remove the Chair of the CFB and its trustees. Their responsibilities and powers have been recently redefined, as detailed in *Appendix 1*.
- 4.8 The CFB serves as the primary governing body and is responsible for setting the strategic direction of the entire Federation, overseeing its financial health, performance, and the overall effectiveness of its academies. The CFB holds the legal responsibility for the Federation.
- 4.9 Reporting to the CFB are various sub-committees, such as the Finance Committee and the Risk & Controls Committee. These committees provide specialised oversight in key areas and report their findings directly to the central board. The CEO provides a report to each CFB and there are updates on each of the Federation's settings.
- 4.10 Each academy within the Federation also has its own Local Governing Body (LGB). These bodies provide localised oversight and support to the Principal and the Senior Leadership Team (SLT) of their respective academies. Their role is to ensure adherence to the Federation's policies and standards at the local level.
- 4.11 Principals and SLTs are charged with the day-to-day operation of each academy. They are accountable to their respective LGBs and, ultimately, the CFB.
- 4.12 The relationship between the CFB and LGBs is defined by several key components.
- **Strategic Direction** is set by the CFB, with the LGB ensuring its implementation at the school level.
  - **Financial Oversight** is managed centrally by the CFB, while the LGB monitors the school's specific budget and resource allocation.

- **Policy Implementation** requires each school to implement policies established by the CFB, including those on behaviour, with the LGB monitoring their application.
- **Accountability** flows from the Principal and SLT to both the LGB and, ultimately, the CFB.

4.13 In essence, while LGBs possess a degree of local accountability, they remain subordinate to the CFB. This structure creates a centralised governance model for the Federation, which seeks to ensure consistency and maintain high standards across all its academies while allowing for local input and oversight.

### Inspection Outcomes and Commentary on Behaviour

4.14 MVPA's first inspection in October 2016 was a section 5 graded inspection that judged the school to be good overall. While the report identified significant strengths, including that pupils were articulate, polite and made good progress, it raised specific concerns about the school's approach to behaviour and discipline.

4.15 The 2016 inspection found that fixed-term exclusions were very high, particularly affecting pupils of Black Caribbean heritage and disadvantaged pupils. The Behaviour Support Unit (BSU) was used extensively, with some pupils spending lengthy periods there with limited opportunities for reflection or learning support. Critically, inspectors concluded that the discipline system did not allow pupils to demonstrate self-discipline, and that some pupils and parents felt the school culture was not nurturing, making them reluctant to share concerns with staff.

4.16 The school was specifically advised to develop a culture of trust where concerns could be openly shared. The report also noted positive behavioural aspects: the school environment was extremely quiet and orderly, pupils were polite and articulate, attendance was above the national average, and behaviour at break and lunch was calm.

4.17 In October 2021, a section 8 inspection found MVPA continuing to be good, with evidence suggesting it could be judged outstanding. The report described high expectations for behaviour, with poor behaviour and bullying being rare and effectively addressed. Significantly, the 2021 report acknowledged that *'some pupils, parents and carers do not feel confident approaching staff about concerns or queries'* but noted that *"Leaders are taking effective action to address this,"* including implementing drop-in surgeries and introducing an *"I need a chat"* box for pupils to raise concerns. This area for improvement related to ensuring parents felt informed and involved in school

life more broadly, though this was not explicitly linked to the 2016 concerns about trust and discipline.

- 4.18 The January 2023 section 5 inspection judged MVPA as outstanding in all categories. The report highlighted that the school provided an exceptional education, with pupils who were polite, articulate, hardworking and ambitious. It described a calm and well-ordered environment with exemplary behaviour in lessons and around the school, noting that bullying incidents were rare and quickly addressed. The report emphasised that *"Leaders have high standards for behaviour"* and that staff use *"behaviour strategies consistently well across the school, including through frequent rewards,"* with pupils able to exchange achievement marks for prizes.
- 4.19 The trajectory across these three inspections shows a marked shift in emphasis. The specific 2016 findings regarding high exclusion rates, the functioning of the BSU, limitations in developing self-discipline, and concerns about a non-nurturing culture do not feature prominently in the subsequent reports. While the 2021 report mentions parental confidence in approaching staff with actions being taken, and the 2023 report describes exemplary behaviour and high standards, neither explicitly reference or assess whether the 2016 concerns had been resolved.
- 4.20 As part of my review, I discussed with Ofsted why the issues raised in 2016 did not feature in the evidence collation for subsequent inspections. Given the commentary known to have been made by parents/carers and the findings from the pupil survey undertaken by Ofsted as part of its 2023 inspection, the minimal focus on behaviour - even by way of confirming that the previous areas for improvement had been addressed - was surprising.
- 4.21 I was advised by Ofsted that given the negative comments in the pupil survey and the 'Free Text' comments captured in Ofsted's Parent-View survey, inspectors balanced these with the discussions they held with school staff and pupils. Ofsted also clarified that its inspectors would have raised issues about behaviour with the school's leadership.
- 4.22 In a letter sent to me by the HMCI for Ofsted, he said, *"Although not referred to in the published 2023 report, the inspection explored some of the themes from the parent survey through following up the school's actions to address the improvement point from the 2021 inspection report: keeping parents informed, involved in school life, developing further partnership to build trust. The evidence shows that this was followed*

*up from the start of the inspection, including in the preparatory telephone call. For example, leaders discussed the school's website which showed a programme of workshops for parents starting in January 2023, introduced in response to concerns raised by parents about their children's mental health; the school had completed a lot of work to communicate options information to parents to keep them informed and involved, in response to concerns about the curriculum; fortnightly meetings with parents of pupils attending alternative provision held to discuss their progress and reintegration back into mainstream classes."*

- 4.23 Notwithstanding Ofsted's response, given the narrative that has emerged through my review, some of the issues about behaviour management and the BSU raised in both 2016 and 2021 seem not to have been fully resolved.

### **MVPA's Behaviour Policy**

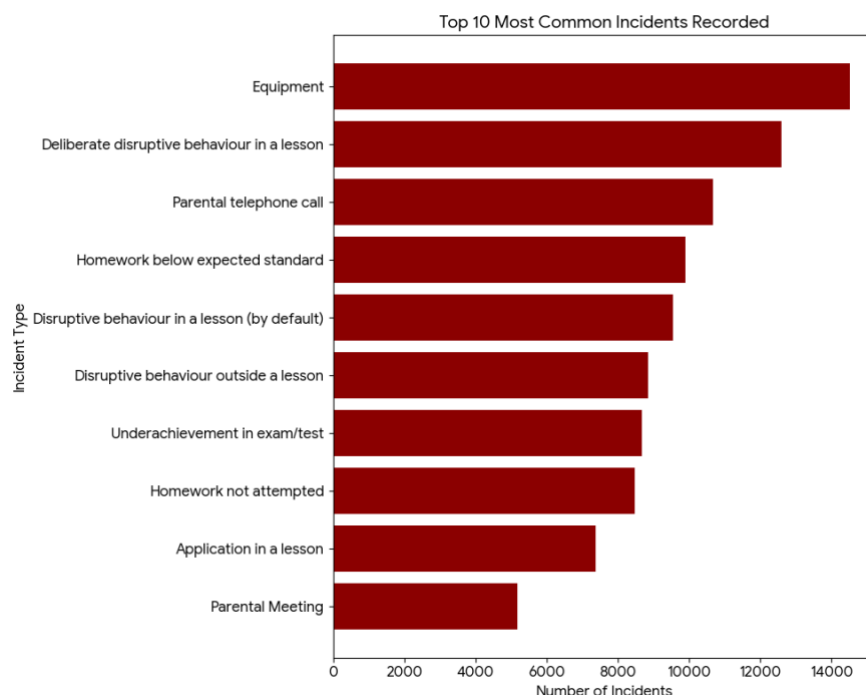
- 4.24 MVPA has received significant attention for its highly structured and rigorously enforced behaviour policy. This policy, central to the academy's ethos, aims to cultivate a disciplined and focused learning environment conducive to academic excellence. As a document, it is strong, well-intentioned and aspirational, with clear aims, carefully considered provisions, and a focus on ensuring success for all pupils. The strict nature of its approach, however, has sparked considerable debate, raising questions about its potential benefits and drawbacks.
- 4.25 MVPA's behaviour policy is rooted in the belief that consistent and unwavering standards are essential for creating a calm and orderly atmosphere. This approach is characterised by:
- Clear guidelines about conduct being communicated to pupils and parents, leaving little room for ambiguity.
  - The policy prioritising adherence to rules, with sanctions implemented for violations.
  - A focus on removing distractions and promoting concentration.
  - A high importance being placed on the safeguarding and wellbeing of the pupils.
- 4.26 The leadership of the Federation and MVPA argue that the behaviour policy fosters a culture of respect, responsibility, and academic achievement. They point to the academy's consistently high academic performance as evidence of its effectiveness. The structured environment, they contend, allows teachers to focus on instruction and pupils to maximise their learning potential. Furthermore, the emphasis on discipline is

seen as a means of preparing pupils for the demands of higher education and the professional world.

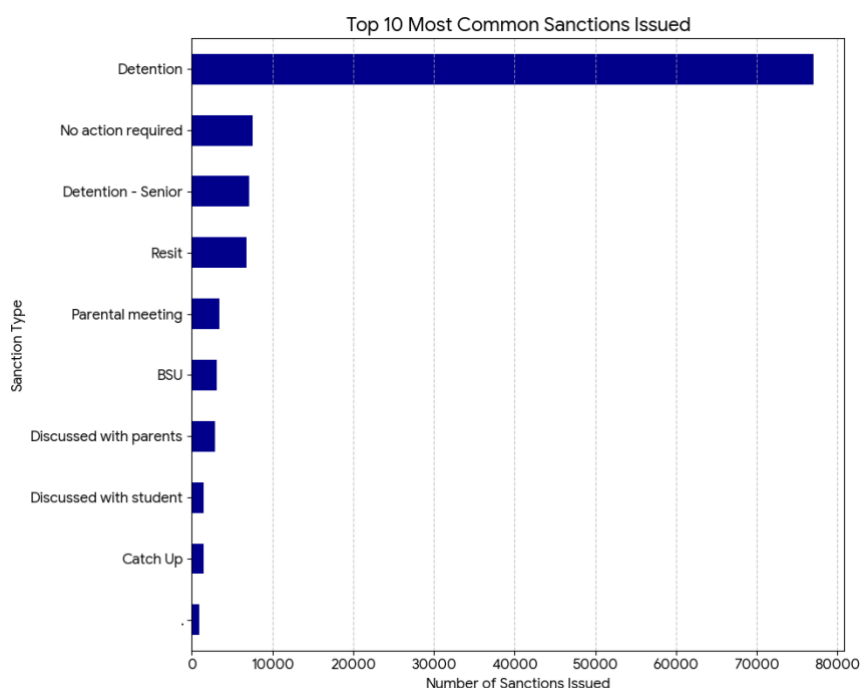
## **Incident, Rewards and Sanctions 2022-2025**

- 4.27 The CHSCP initially requested MVPA's behavioural incident logs in January 2025, although no data was released by the Federation until April 2025. The original dataset shared with me was extremely basic, consisting of a 22,000-page PDF document that listed individual sanctions and rewards. It was unusable for the purposes of detailed analysis, and further to requesting an alternative format, I was subsequently advised that a '*special database query*' was required and that no staff member was available to recompile it.
- 4.28 I was eventually provided with a CSV copy in November 2025. Whether this substantial delay reflects weak IT functionality, transparency or internal capacity issues, MVPA's arrangements in this regard point towards an inefficient and unagile system.
- 4.29 My brief analysis of MVPA's data is set out below and covers incidents, rewards and sanctions that were recorded between January 2022 and April 2025. For added context, none of the data contained any reference to pupils being removed from classrooms and/or 'desking'. It is reasonable to assume that such instances are not accounted for in the data. If they exist elsewhere, they have not been shared with me.
- 4.30 It is also relevant to highlight that despite requesting evidence demonstrating how data on rewards and sanctions had been interrogated by senior leaders and presented to the CFB, LGB or any other committee of the Federation, little was provided. Some minutes highlight a focus on exclusions and suspensions, and one LGB meeting in March 2023 referenced an analysis carried out the proportionality of sanctions relating to hair style and appearance. Overall, however, while school leaders have required staff to routinely record this information, there is little to indicate they have made any meaningful or systematic attempts to interrogate it and regularly share it with governors for scrutiny.
- 4.31 Between January 2022 and April 2025, a total of 332,745 events identifying pupil behaviour incidents and rewards were recorded across 831 unique school days. There were 205,114 rewards and 127,631 incidents.

- 4.32 The average number of rewards recorded for each school term was approximately 20,511 or 247 per day. For incidents, an average of 12,763 were recorded per term or around 154 per day.
- 4.33 In terms the nature of incidents, the preponderance of low-level events within the data is clear. The most commonly recorded related to equipment issues, disruptive behavior, and the non-completion of homework. It was unclear to me what a “parental telephone call” meant in the context of a behaviour incident involving a pupil, although this was the third highest category.

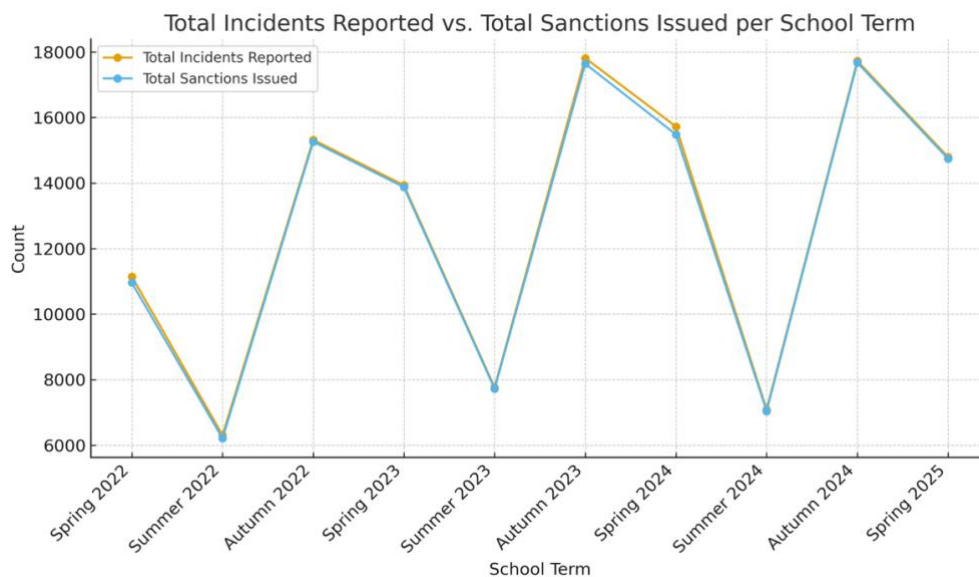


- 4.34 Detentions accounted for the vast majority of issued sanctions. 77,018 were recorded throughout the data period, averaging approximately 93 a day.



- 4.35 The data also revealed clear disparities. Male pupils comprise 66% of all recorded incidents and they are nearly twice as likely to be sanctioned as their female counterparts. This is not unprecedented nationally, but the scale warrants scrutiny.
- 4.36 Incidents and sanctions are heavily concentrated in the senior cohorts. Year 11 students account for the largest proportion of incidents, followed by Year 10. This suggests cumulative behavioural patterns, pressures potentially associated with examination years, adolescence or a waning of sanction effectiveness as children get older.
- 4.37 Events involving pupils with a status of Pupil Premium make up half of the entire data (rewards and incidents), while pupils flagged for Free School Meals account for just under half. A significant portion of all recorded behaviour, both positive and negative, is linked to these groups.
- 4.38 My analysis also confirms that when focusing on trajectory, there are clear patterns that emerge across the recording of both incidents and the issuing of corresponding sanctions. The data reveals two primary trends: a seasonal cycle and a moderate, underlying long-term increase in overall volume.
- 4.39 The Autumn terms consistently register the highest volume of incident records, peaking at 17,814 incidents in 2023 and 17,728 incidents in 2024. Conversely, the Summer terms record the lowest volume, with numbers approximately 50% to 60% lower.

4.40 Alongside the seasonal volatility, the moderate upward trend in the overall volume of events is illustrated in the figure below. The lines tracking total incidents and total sanctions remain tightly coupled across the entire period, confirming that most incidents result in a formally coded sanction (other than those recorded as “Null”, “no action required” or where the text was blank or ambiguous).



4.41 The term-by-term breakdown of rewards reveals a similar seasonal pattern. The Autumn term consistently registers the highest volume of rewards, while the Summer term consistently records the lowest.



4.42 The overall change between the first and last full year is equally significant, showing that the recording of positive behaviour is also on an upward trajectory.

4.43 The correlating data patterns described above suggest that the recording of all pupil behaviour is being governed by the same environmental and operational factors. These could relate to the following:

- Both incidents and rewards require a teacher to observe a behaviour and then take the administrative step of recording it. This opportunity is likely to be at its highest when pupils are in structured lessons and teachers are at their most diligent.
- Autumn is the longest term with the highest contact time between pupils, teachers and staff following the summer break. The start of the school year is also likely to be marked by school leaders re-launching expectations with teachers and staff about policy application.
- During exam season, the pupil body will be reduced, and structured lesson time cut. This is likely to reduce the opportunity to observe and record both behaviour incidents and more praiseworthy moments.

4.44 As I set out later, I was also informed how school leaders track teacher performance as it relates to sanctions and furthermore, that specific targets are set for issuing rewards. In this context a hypothesis emerges; that data is being less influenced by the actual behaviour of pupils or the diligence of teachers and staff, and more driven by intentional and system-wide data management.

4.45 While only a hypothesis and one I lack the time to explore further, the correlation between sanctions and rewards appears to be significant. It acts as a proxy indicator to provide assurance (or otherwise) about the efficacy and fairness of behaviour management. Indeed, in Ofsted's communication with me, the significance of this data relationship was explained as follows: *"The inspection team also reviewed documentation provided by the school showing the number of rewards given to pupils compared to negative behaviour points, which showed that there were three times more reward points given compared with negative behaviour points."*

4.46 The data also highlights issues of disproportionality that I expand upon later in my report.

## 5. What People Say

- 5.1 To supplement the information included in the submitted accounts and the interviews undertaken as part of my review, I gathered additional perspectives on MVPA and the wider Federation from a range of stakeholders. These included views expressed by pupils, additional experiences shared by parents and carers, the perspectives of teachers at MVPA, and the opinions of key agencies that maintain regular operational links with the school.

### The Voice of Pupils

- 5.2 In determining the best approach to capture the voices of children, a proportionate approach was taken to this exercise. On balance, I did not consider it necessary to identify and engage individual pupils currently at MVPA (or cohorts of pupils). The rationale for this was four-fold and centred on an approach that would not risk restressing or retraumatising children through what would likely have been a challenging interview.
- 5.3 Firstly, given the concerns expressed by those submitting accounts that their children would suffer repercussions if their identities became known, whether real or perceived, I did not want to exacerbate these fears by selecting certain pupils for interview. Secondly, some of the accounts to which I had access were from those who had recently been pupils at MVPA, and as such, could reasonably be taken as reflection of what some existing pupils might say. Thirdly, the testimonies from parents / carers and professionals all centred on describing the experiences of children, many going into detail about what specifically happened to them, what they said and the impact upon them. Fourthly, I had access to other information that had already captured the recent views of pupils, specifically, the survey issued by Ofsted as part of its 2023 inspection. Whilst I had some debate with Ofsted about this point, I believe it was reasonable to infer that the views expressed in this survey were statistically valid and warranted clear referencing in my review.
- 5.4 Overall, the evidence captured about the voices of pupils paint a picture of a school environment characterised by a profound lack of empathy. One ex-pupil recalled their first day, thinking, "*we have to be like robots.*" and then being told when they left that staff had been "*especially instructed to glare at year 7 students, to pick on them and intimidate them.*"

- 5.5 Ex-pupils also shared distressing accounts of their mental health struggles and how the school handled them. One stated they were *"severely struggling with my mental health and my school did not treat me with the care or sympathy that I deserved."* Further testimony described teachers' actions as emotionally damaging; one person wrote that they and others were *"mentally abused by teachers, led to self-harm and anxiety."* This reported mistreatment was linked directly to self-harm by another individual, who revealed, *"During year 9 I started to self-harm because the teachers made me feel as though I didn't deserve to live because of my grades."*
- 5.6 The accounts collectively raised concerns regarding a school culture that disregarded the needs and dignity of some pupils. In one instance, a female ex-pupil described being denied bathroom access while menstruating, resulting in her being left *"in pain, seated for eight hours, bleeding through my skirt."*
- 5.7 Another ex-pupil, after being discharged from a mental health setting, was given an ultimatum by a staff member, either go to assembly or *"sit in the hallway on one of the 'time out' desks and cry there."*
- 5.8 Attempts to report issues were said to be met with hostility. A pupil who tried to report a teacher for bullying was told it was considered a *"baseless and frankly disrespectful accusation."* When a group raised concerns about racially problematic language, they found that *"what we thought was a safe and civil environment... instead became a hostile environment in which we were met with a combative response."*
- 5.9 One ex-pupil summarised the trauma, stating, *"It truly has damaged my life."* Another said, *"when I left, I had to rebuild myself and teach myself how to integrate into society."* A poignant summary comes from an ex-pupil who concludes, *"They used to say often that 'this is no ordinary school', and I agree, it is a school that destroys your life and leaves unhealable scars."*
- 5.10 In considering the survey undertaken by Ofsted as part of its inspection of MVPA in 2023, this was mainly completed by pupils in Years 9-11. The survey was returned by 83 pupils (approximately 10% of the school roll). It identified several issues.
- 5.11 A significant portion of pupils reported a general lack of enjoyment of school and learning. Specifically, 27% of pupils indicated they either almost never (16%) or never (11%) enjoy school. A similar finding emerged regarding engagement, with 29% of pupils stating they almost never (22%) or never (7%) enjoy learning at the school.

- 5.12 A substantial concern for pupil well-being was indicated by the responses regarding bullying and feelings of safety. A notable 30% of pupils reported that bullying is an issue, with 24% stating it happens and that teachers are not good at resolving it, and an additional 6% claiming it happens, and teachers do nothing. Furthermore, a concerning 29% of pupils do not consistently feel safe while at school, broken down as 17% feeling safe some of the time, 5% feeling safe almost never, and 7% feeling safe never.
- 5.13 The culmination of these concerns is reflected in the overall response to pupil satisfaction, with 41% of pupils stating they would not recommend MVPA to a friend moving to the area. This strong negative sentiment, from nearly half the respondents, underscores the seriousness of the issues raised across all areas of enjoyment, learning, safety, and addressing bullying. Ofsted's view on the survey was summed up in a letter to me sent as part of this review.

*“Overall, the view from respondents to the pupil survey (which as I have said is not overly representative) was largely mixed, with not many excessively positive or negative responses. The results were considered alongside other inspection evidence gathered. As is typically the case, regardless of the response rate, themes including comments made by a relatively small number of pupils which raised some concern, were followed up by the inspection team through direct discussions with leaders and pupils.”*

- 5.14 However, as part of my analysis, I gave more credence to this survey. While I acknowledge that a voluntary sample can be subject to self-selection bias, a 10% response rate from a finite population is, in standard statistical practice, a robust sample.
- 5.15 For a population of circa 830, a sample of 83 pupils provides a confidence level of 95% with a margin of error of approximately  $\pm 10\%$ . This means we can be 95% confident that the true views of the entire pupil body are reflected in the survey results, within a 10-point range. While a higher response rate is always ideal, a properly drawn 10% sample is frequently used in national surveys and academic research precisely because it provides a statistically relevant and reliable snapshot. Therefore, I maintain that it was both methodologically sound and necessary to consider these results alongside the other qualitative evidence.

- 5.16 I understand that the inspection methodology includes follow-up discussions, and Ofsted confirmed that this occurred at MVPA in relation to the survey results. However, no documented outcome of these discussions, or any other recorded material, was shared with me that explained why the negative issues raised in the survey attracted no commentary in the inspection report itself.
- 5.17 Indeed, despite Ofsted only engaging with a marginally higher percentage of pupils whilst on site (14%), the final report is fundamentally weighted towards the positive views that were expressed. In my opinion, the correlation between the pupil survey results and the substantially higher number of concerns raised during this review confirms the relevance that the survey held at the time.

## **Parents / Carers**

- 5.18 In addition to the written accounts submitted by parents and carers, I considered a range of other material from which the views of this cohort could be examined. In the main, these were derived from a survey issued as part of this review, the views captured within Ofsted's Parent View survey and the results of a survey issued by MVPA in March 2025.

## **CHSCP Survey of Parents / Carers of Pupils currently at MVPA**

- 5.19 A total of 52 responses were received from parents and carers to the CHSCP's survey issued for this review. Those who had already submitted an account via the Educating Hackney website were advised that they did not need to participate in this exercise. The feedback was highly polarised, with most respondents expressing strong satisfaction and gratitude, contrasting with serious concerns raised by a smaller number regarding the school's culture and specific practices.
- 5.20 Most respondents expressed full support for MVPA, frequently using terms like "*excellent*," "*thriving*," "*safe*," and "*grateful*" to describe their children's experience. Several stated their belief that the allegations were "*unfounded*," "*sensationalised*," and driven by a "*political*" or "*class*" issue. Some were directly urging me to disregard the 'campaign' and focus on the school's positive impact on disadvantaged children. Many of the positive themes identified reflected those set out in the open letter from parents / carers published in the media in December 2024.
- 5.21 The school was praised for providing a safe and calm environment, with a zero tolerance of bullying. Several parents noted that the absence of bullying and fights

(that they believed were common at other local schools), was a primary reason for their children feeling secure.

- 5.22 The school's strict discipline, clear boundaries, and high expectations were explicitly supported by many parents. They said this structure was essential for an inner-city school to minimise disruptions, ensure all pupils focus on learning, and keep children safe from external risks like crime and gangs. Many parents stated they chose the school specifically because it is strict.
- 5.23 Many were also delighted by their children excelling academically and achieving outstanding results that transform their life chances, often exceeding initial expectations. The school was praised for being highly aspirational for its pupils.
- 5.24 Contrary to some of the concerns raised, several parents of children with SEND (including Autism, ADHD, Dyspraxia, Dysgraphia) reported that their children are thriving. They highlighted the school's proactive and exemplary support, including:
- Swiftly arranging assessments and diagnoses for previously undiagnosed needs.
  - Providing reasonable adjustments like laptops, time with an Occupational Therapist, and mental health referrals (e.g., to CAMHS and school counsellors).
  - Supporting complex conditions like narcolepsy with proactive research and adjustments.
- 5.25 The school was credited with prompt, effective, and professional responses to serious incidents, including an unprovoked knife threat and a child with a bladder problem receiving a discreet toilet pass and supportive guidance. Staff were reported to have offered immediate support and adjustments following a child breaking both arms and a child dealing with grief after a family death.
- 5.26 Teachers and Heads of Year were frequently described as "*dedicated, kind, passionate professionals*," who are "*supportive and very helpful*," often noticing and responding to a child's mood or personal struggles. While communication is a major point of criticism, some parents reported that their calls were always returned promptly and that staff are approachable and easy to contact.
- 5.27 A distinct set of concerns, primarily focused on the school's strict culture and communication processes, were raised by a minority of parents. They reported that teachers "*scream*" or "*shout*" at children, which creates an "*atmosphere of fear*". This

behaviour was described as *"disrespectful and humiliating"* and, in one witnessed incident involving a senior member of staff, was described as *"abusive screaming"* that left parents and children *"in shock"*.

- 5.28 Children were reportedly given detentions for minor issues such as looking at the clock or fixing a shoelace. One parent recounted how their child endured a 40-minute detention, instead of the intended shorter sanction, because they were *"too scared"* to speak up. The teacher supervising the detention had threatened an additional 30 minutes for anyone who spoke. Concerns were raised that the *"totalitarian discipline policy"* has a disproportionate impact on Black African and Black Caribbean children.
- 5.29 Despite the positive examples of accommodation for medical needs, a core complaint was a culture of restricting children's access to the toilet during lessons, forcing them to *"plead"* and risking sanctions. This practice was labelled by one parent as being *"unacceptable from any basic safeguarding and human rights perspective"*.
- 5.30 A lack of effective communication was also a recurring issue raised in the survey, with several parents complaining of unanswered emails and phone calls when requesting to speak to teachers. One parent was not informed that their daughter was kept behind for a 40-minute detention, which they called a *"safeguarding issue"*.
- 5.31 Another parent said that children with special educational needs are *"not given the flexibility, reasonable adjustments, and indeed compassion that is necessary,"* potentially creating an Equality Act issue.
- 5.32 Concerns were raised about direct race discrimination, with a parent citing an instance where it took six months and numerous letters to get permission for a child to be allowed to wear a religious item.
- 5.33 Some parents reported that legitimate and constructively raised concerns, including those about racial forms of address and general communication practices, were ignored. One senior leader was criticised by a respondent for disclosing a parent's personal information in a letter about the review that was circulated to all parents. They labelled this as defamatory and a fundamental breach of professionalism and data protection.

## MVPA Survey of Parents / Carers

5.34 MVPA organised a survey of parents / carers of pupils currently at the school, which it reported on in March 2025. The survey received 429 response (176 in 2023). The responses demonstrate strong parental confidence in the school across most measures, with notable improvements since the 2023 survey. The school received particularly high ratings for safety, behaviour management, high expectations, and co-curricular opportunities. With regards to the specific questions and their responses:

- 92% felt their child is safe at the academy
- 95% agreed the school has high expectations of their child
- 91% confirmed pupils are well-behaved
- 89% believed their child is doing well academically
- 91% reported their child can participate in co-curricular opportunities
- 84% were satisfied with the range of subjects available
- 86% felt the academy provides support enabling their child's success
- 78% of parents would recommend Mossbourne to other parents, indicating strong satisfaction despite some areas of concern.
- 79% of parents agreed their child is happy at Mossbourne, this represents the lowest positive rating across wellbeing indicators
- 59% agreed bullying was handled effectively
- 55% felt their concerns were handled properly

5.35 The full table of results is at *Appendix 2*.

5.36 Governors should celebrate the high levels of parental confidence. However, the bottom three areas highlight a notable minority of parents who express dissatisfaction. There are concerns about pupil happiness, responses to bullying and the handling of concerns and communication. These specific issues have a track record, having all been highlighted in previous inspection processes involving the school. The 2016 Ofsted inspection report noted that MVPA's strict discipline could, at times, limit pupils' well-being and their opportunities to express concerns. By 2021, while behaviour and ambition were still highlighted as strengths, aspects of welfare and communication were identified as being less secure. This was echoed in the 2023 inspection of MVPA, with parental views submitted to Ofsted capturing ongoing doubts - particularly regarding bullying, responsive communication, and pupil happiness.

5.37 These three areas are also prominent in the concerns raised by parents to this review. Addressing these areas will strengthen trust and wellbeing. Ensuring communication

is clear, concerns are addressed promptly, and wellbeing initiatives are visible to parents and pupils will support parents (and others) to feel comfortable in approaching the school with any concerns they have.

## **MVPA Teachers and Staff**

- 5.38 Only 13 teachers / staff responded to the CHSCP survey that was issued via MVPA to its workforce as part of this review. Of those 13, eight held some sort of leadership position, ranging from senior leaders to Heads of Year and Heads of Subject. I have no firm explanation to account for why the responses from more junior teachers / staff were so few. However, whilst low in number, the response revealed a deeply divided perspective on the school's culture and practices, presenting strong endorsements alongside serious concerns.
- 5.39 In terms of strengths, several teachers / staff characterised MVPA as the safest school they had ever worked in, noting its "*much higher standards of care and safety for its pupils and staff*". The school environment was described as remarkably calm, with minimal bullying among pupils, and calm corridors and playgrounds. This safety was attributed to the school's strict approach, which some staff believed ensures respect and allows learning to be the focus.
- 5.40 There was consistent praise for the school's commitment to high standards, which has resulted in outstanding academic outcomes, placing MVPA among the top schools nationally for progress. Many teachers / staff expressed a deep, personal commitment to the school, with several noting that they choose to send their own children to MVPA because they believe in its safety and mission.
- 5.41 Furthermore, the safeguarding culture was repeatedly described as "*incredibly strong*," with competent Designated Safeguarding Leads (DSLs) and swift action taken on pupil concerns. The pastoral and inclusion teams were highlighted as being valued for their hard work and the support they provide, including a variety of interventions and collaboration with external agencies.
- 5.42 Despite these positive accounts, others raised profound concerns regarding the school's culture, particularly relating to leadership conduct and the treatment of vulnerable pupils. Responses alleged an institutional and routine practice of some staff raising their voices at pupils, which was framed as being essential for maintaining good behaviour. The leadership at MVPA were accused of fostering a "*climate of fear*". School leaders were reportedly instructed to "*make their presence known*" by publicly

reprimanding pupils, a practice described as confected to occur in the most public settings possible.

- 5.43 A staff development session was reported to have stated that pupils should have a "*healthy fear*" of teachers, and one former leader allegedly filtered out job applicants if they would not shout at children. The practice of shouting was also reported to have created a tense environment for staff, with members being shouted at to the point of crying, and instances of them being ridiculed or referred to with personal insults. One teacher mentioned experiencing "*toxic masculinity*" displayed by men in power.
- 5.44 Other teachers referred to a system in place to collate and analyse some aspects of sanctions, although this appears to have less to do with a focus on pupils and more to do with teacher performance. This system was a list of teachers organised by the number of sanctions they had issued within a fixed period that would be scrutinised in 'Extended Leadership Team' meetings.
- 5.45 It was referred to as a '*league table*' by several teachers, with the top section of the list being colour coded green (most sanctions issued) and the lower section colour coded red (least sanctions issued). One long-term teacher said, "*You get presented with these are the top 10 rankers of behaviour... and then here are the bottom 10.*" The senior teachers I spoke with about this system provided mixed accounts:
- The first neither confirmed nor denied its existence but spoke about the intent being to ensure staff engage with the process and uphold the school's culture.
  - The second said the colour coding is simply to show who is giving out the most and least behaviour points, primarily to help the Extended Leadership Team (involving Heads of learning areas) to track and see potential discrepancies. He gave an example of the system potentially identifying a part-time learning support teacher who might be issuing too many behaviour points.
  - The third said that a specific target number is issued for achievement marks (rewards), which was described as a "*hard and fast number*" allocated based on teaching load. He said there was a table of this that is shared in learning area meetings. He also added that scrutiny could involve a focus on a "*very specific area*" like a teacher never sanctioning anyone for corridor behaviour. In these circumstances, teachers may be questioned as it suggests they are either not in the corridor or letting things go. The senior leader says this "*wouldn't be a league table*" and would be focused on a specific code, not all sanctions.

- 5.46 The ambiguity and inconsistency attached to these accounts (and others) reflects that this “league table”, whatever its intent, is far from clear. In my opinion, the colour coding and how teachers are interpreting its purpose, points very much towards the statement made by the senior leader about ‘*upholding the school’s culture*’. There is no dispute that part of this culture is built on strict discipline. As such, it is reasonable to conclude that the performance of teachers in this respect is subject to scrutiny, with the table being used as a simple way to monitor compliance.
- 5.47 A further critical area of concern highlighted by some of MVPA’s current staff was the inconsistent and potentially non-compliant support for pupils with SEND. Concerns raised included EHCPs not being followed (even the legally binding Section F) and a “*plummet*” in the number of Teaching Assistants, leaving multiple EHCP pupils unsupported in class. The Federation’s attitude toward the SEN department and its funding was also raised as a key issue. Staff reported a policy of inflexibility regarding catering to SEND status, with pupils being denied time-out passes or fidget toys (like blue tac), despite recommendations from external health professionals like CAMHS, a policy noted to be at odds with a sister school (Mossbourne Community Academy). Furthermore, one member of staff alleged that they were advised to “*just shout at her*” when engaging a senior member of staff about how to manage a pupil with an EHCP who was experiencing Emotionally Based School Non-Attendance (EBSNA).
- 5.48 Concerns were raised about MVPA’s SLT actively creating evidence to support moving EBSNA pupils out of the school and refusing managed moves. This was reported as sometimes involving staff communicating with parents (and each other) over the phone to avoid written records. A further allegation from a member of staff stated that a senior leader had said, “*if you’re quoting a policy, it’s not written down and there is a reason for that,*” suggesting intentional non-documentation of specific practices.
- 5.49 From the data shared with me for the review, MVPA clarified that there had been no managed moves of pupils from the academy between 2022 and 2025. With regards to pupil retention, the percentage of Year 7 pupils who do not remain to complete Year 11 has risen sharply, reaching 22.1% in 2024. This gives the academy a three-year average retention loss rate of 18.3%, which is substantially higher than its sister school, MCA (12.3%). When compared to other secondary schools in Hackney, MVPA’s performance on this measure places it in the bottom half of local schools. The England national average for this metric is approximately 7%.

- 5.50 Some staff also reported practices designed to manipulate the school's image during external visits. For example, pupils who had been sanctioned and placed on desks in corridors were removed and placed at the back of classrooms during external reviews. An example of this was reported as having taken place when the CHSCP's Independent Safeguarding Children Commissioner visited MVPA and I saw evidence of specific communication instructing teachers to place children at the back of classrooms for this event. It should be noted that the leaders I spoke with provided a different reason for this practice, advising it was to prevent those children on desks from being distracted.
- 5.51 Finally, the leadership response to the concerns in the national press was criticised by some of the respondents. The staff briefings held were described as downplaying the issue with phrases being used like "*nothing to see here*," being made, while the CEO reportedly called the review a "*fishing expedition*," and asserted the articles were the result of a vexatious complainant.
- 5.52 Other concerns expressed by staff included retention, high staff workload and burnout, with one member of staff recounting a school leader's view that the MVPA model is to "*get in young teachers, burn them out after two years and then get new teachers in*".

### **Agencies involved with MVPA**

- 5.53 Several agencies raised concerns during the review process regarding pupil welfare, behaviour management, and support for those with SEND. These included Hackney Education, Hackney's Multi-Agency Safeguarding Hub (MASH) and CAMHS, with further insights provided by the Metropolitan Police Service (MPS). A recurring theme across all these reports was the use of disproportionate and inflexible policies that may be having a detrimental effect on some pupils.
- 5.54 According to a report from Hackney Education, issues have been raised with them directly about behaviour sanctions and the clarity of the suspension and exclusion process. One parent reported to Hackney Education that their son became so fearful of asking for a toilet break that he wet himself. Another parent noted their son's mental health deteriorated after joining the school. The submission from Hackney Education for my review highlights instances where pastoral care was allegedly missed, with one child reportedly denied a place on a music trip without a clear reason, and another being sent out of a lesson for not wanting to read aloud. For some families, this lack of support reportedly led them to choose elective home education (EHE).

- 5.55 In addition, significant concerns were noted regarding the support for children with SEND and neurodiverse needs. It was reported that some pupils weren't receiving the reasonable adjustments they needed. A child with autism, for example, allegedly received no adjustments for managing transitions, leading to dysregulation. Another child with anxiety was reportedly told not to bring headphones, which they used for distraction, in order to comply with school rules. The report noted that complaints made to Hackney Education emphasised that sanctions were being used liberally, potentially harming neurodiverse children whose SEND needs were not being met, leading to punitive responses rather than appropriate support.
- 5.56 The CAMHS submission corroborated aspects of this, highlighting that detentions were used excessively, particularly for anxious pupils or those with neurodevelopmental difficulties. CAMHS clinicians reported that staff sometimes used shouting and angry communication, which exacerbated psychological harm, and that pupils felt staff were hostile and didn't listen to their concerns.
- 5.57 CAMHS also raised a key concern that making adjustments for mental health or neurodiversity was seen within the school's culture as "not fair," making it difficult to negotiate reasonable accommodations, even when aligned with best practice guidance.
- 5.58 It was noted that some staff feared raising concerns due to potential negative repercussions on their work with the school. Furthermore, important referral information was allegedly not shared with CAMHS on at least one occasion, potentially hindering a pupil's support.
- 5.59 Observations from Hackney's MASH revealed a higher-than-average number of referrals from Mossbourne academies, including MVPA, particularly for child mental health concerns. In a 2023 snapshot, MVPA had the highest number of referrals among all schools, with many related to what MASH considered minor behaviour issues. These referrals were often being made without parental consent.
- 5.60 The MASH also noted that some referrals detailed children receiving a significant number of detentions. An isolated incident in October 2024 also involved a MASH social worker raising concerns about a DSL's language regarding a vulnerable child.
- 5.61 Finally, while the MPS report did not explicitly identify concerns, a review of police intelligence revealed several incidents involving MVPA pupils that may be linked to the

issues raised by the other agencies. These included pupils running away from school due to disciplinary actions, reports of self-harm potentially linked to school-related stress, and allegations of bullying and concerns over the school's handling of safeguarding.

## 6. The Review's Findings

### Behaviour in English Secondary Schools

- 6.1 The issue of pupil behaviour in English secondary schools has become an increasingly prominent feature of educational discourse and policy. A perceived rise in classroom disruption, combined with political and media pressure for higher academic standards, has led many schools to adopt strict behaviour policies. These policies are often characterised by *zero-tolerance* or *no excuses* approaches, structured routines, and an emphasis on compliance. While such measures have been credited with improving order and academic focus, they have also raised concerns regarding pupil well-being, equity, and inclusion.
- 6.2 The early 2000s marked a shift towards stricter discipline in schools, driven by government concerns over standards and behaviour. Under the Labour government, the 2001 Education White Paper emphasised the need for improved behaviour and stronger school leadership. This was followed by increased support for interventions to restore order in classrooms.
- 6.3 The policy direction intensified under the Conservative-led coalition from 2010. It advocated strongly for traditional values in education, promoting a return to discipline and respect for authority. The expansion of Academies and Free Schools, with greater autonomy over internal policy, allowed for experimentation with more rigid systems of behaviour management. Some schools such as Michaela Community School in London came to exemplify the “no excuses” model, marked by silent corridors, strict uniform codes, and a detailed set of rules governing pupil conduct.
- 6.4 Ofsted's growing emphasis on behaviour in its inspection framework further incentivised schools to adopt stricter policies. A negative judgement on behaviour could trigger special measures or even lead to changes in leadership, arguably putting significant pressure on schools to conform to more rigid expectations.

- 6.5 Strict behaviour policies generally involve a clearly articulated set of rules and sanctions. Many schools employ systems that track behaviour points, use tiered levels of punishment, and implement consequences, such as after-school detentions or internal exclusions for non-compliance. In some cases, pupils are required to follow scripted responses in class or adhere to highly structured movement through school buildings.
- 6.6 In February 2024, the Department for Education published a comprehensive update to *Behaviour in Schools: Advice for Headteachers and School Staff*. This guidance emphasised:
- The introduction of a defined behaviour curriculum, which must be explicitly taught and reinforced through routines.
  - A ban on mobile phone use during the school day.
  - Stricter expectations for the use of removal from classroom, mandating its limitation, parental notification, and continued access to education.
  - A call for consistent application of behaviour policies, with a clear role for school governors and trustees to ensure compliance with the Equality Act 2010.
- 6.7 Governors have a statutory duty to evaluate the equity and effectiveness of behaviour systems - particularly their impact on pupils with SEND, from ethnic minorities, with neurodiverse profiles, or in receipt of free school meals. Ofsted's 2024 framework expects governing bodies to demonstrate active scrutiny of exclusion patterns, behavioural interventions, and disproportionate outcomes.
- 6.8 Supporters argue that strict policies ensure consistency, reduce ambiguity, and promote a calm and focused learning environment. Uniform enforcement of rules is seen as key to fairness and effective classroom management. Moreover, proponents claim these structures help instill values such as discipline, punctuality, and self-control.
- 6.9 For some pupils, particularly those in previous disorderly environments, strict behaviour policies offer clarity, routine, and a sense of safety. Classroom disruptions are minimised, allowing teachers to concentrate on teaching and pupils to focus on learning. Research conducted by the Education Endowment Foundation has linked well-managed behaviour systems to improved academic outcomes, particularly for pupils from disadvantaged backgrounds.

- 6.10 Strict policies can also foster a culture of high expectations and respect. When teachers feel supported in managing behaviour, overall staff morale may improve, potentially reducing teacher attrition in challenging schools.
- 6.11 Despite these advantages, the implementation of strict behaviour policies has prompted significant criticism. One of the main concerns is the disproportionate impact on certain pupil groups. DfE data and 2024 suspension figures show that pupils with SEND, boys, Black Caribbean pupils, and Gypsy/Roma/Traveller Pupils continue to face significantly higher exclusion rates.
- 6.12 ‘Zero-tolerance’ and ‘No Excuses’ approaches may fail to account for the underlying causes of behavioural issues, such as trauma, mental health difficulties, or neurodiversity. In some cases, pupils are punished for behaviours beyond their control, leading to increased alienation and disengagement from education. The rise in fixed-term and permanent exclusions has also been linked to practices such as “off-rolling,” whereby pupils are removed from school rolls to manipulate performance statistics.
- 6.13 Recent National Institute of Health Research (NIHR)-funded research provides robust evidence to support more relational and inclusive approaches to discipline. Its systematic review found that restorative and trauma-informed practices were more effective than punitive sanctions, particularly for vulnerable pupils.
- 6.14 Some argue that strict policies can create overly authoritarian environments. Practices such as enforced silence during lunch or scripted interactions with staff have been described as infantilising and lacking respect for pupil autonomy.
- 6.15 Recent surveys - such as stem4’s 2024 report - reveal that almost 30% of secondary pupils avoid school due to anxiety, with many citing bullying, academic pressure, or unmet mental health needs. These findings make a compelling case for whole-school approaches that embed emotional literacy, preventative support, and inclusive systems. The report emphasises the need for schools to adopt a whole-school approach to mental health and wellbeing, integrating it in the curriculum and culture.
- 6.16 In response to these concerns, there has been a growing call for more nuanced approaches to behaviour. The DfE’s 2024 guidance acknowledges this tension by reaffirming high expectations while also encouraging schools to implement restorative, trauma-informed, and relational strategies.

- 6.17 Training teachers in de-escalation strategies, mental health awareness, and inclusive practice has become a priority for many school leaders. Many successful schools manage to combine firm boundaries with empathetic support, ensuring that all pupils are both challenged and cared for. Governors must monitor the impact of policies across pupil groups, and schools should seek out and integrate pupil voice into behaviour design.
- 6.18 The developments in 2024 - especially the updated DfE guidance and NIHR research - signal a more evidence-based, holistic direction. A balanced behaviour policy must go beyond control and order; it should aim to support the development of respectful, resilient, and well-supported learners. The future of behaviour management in English schools lies in systems that are structured, inclusive, and responsive to the complex needs of today's pupils.
- 6.19 In the last decade, guidance from DfE has been influenced by its '*Behaviour tsar*'-Tom Bennet. He has been one of the strongest proponents of strict behaviour policy in schools. In July 2025, reflecting on zero tolerance behaviour policies, he said on X (formerly known as Twitter),
- "I'd add that zero tolerance in educational settings normally means 'no excuses', which I don't advocate. Even misbehaviour might have context that affects how we respond to it. So, zero tolerance in that context (punishment no matter what) can be cruel and counterproductive. But ZT in the sense that 'no violence will be tolerated,' is necessary."*
- 6.20 This is an important marker when considering how one of Mossbourne's core values of '*No Excuses*' is both interpreted and implemented at MVPA. More detail about the national debate and research on behaviour in schools is set out in *Appendix 3*.

### **Clarifying and Substantiating the Concerns**

- 6.21 Having taken a logical and transparent approach to collecting and analysing evidence for the first task set out in the CSPR's Terms of Reference, I believe there is a compelling case for concluding that the concerns raised about MVPA can be substantiated for the purposes of the review.
- 6.22 Overall, the methodology I have used for the review has provided a powerful form of validation. When the same concerns and themes appear in independent accounts from

a wide array of sources, the triangulated evidence transcends anecdote to a verifiable pattern. These sources included, but were not limited, to the following:

- The initial submission of 342 concerns from children, parents/carers, professionals, and other stakeholders.
- The 73 accounts that specifically met the CSPR's agreed parameters.
- Open-source material about MVPA that has been published by national and local media outlets.
- Evidence obtained from the CHSCP surveys of parents/carers and current teachers at MVPA and the survey issued by MVPA itself and reported in March 2025.
- Evidence and data obtained from Ofsted concerning its activity and any complaints that it had received about MVPA.
- Evidence and data obtained from the DfE concerning any intelligence that it held on MVPA and the Federation.
- Evidence from several agencies that have routine engagement with MVPA.
- The 42 separate interviews I conducted with various individuals connected to the CSPR, with the evidence from senior staff, governors, and current teachers at MVPA being particularly significant.
- A range of relevant data, policies, minutes, and other written material to which I had access.

6.23 It is important to note that the concerns raised were not from a narrow or isolated group. They came from a broad range of individuals, including a significant number of teachers and external professionals working directly with the school. Crucially, many of these people expressed a reluctance to come forward, often fearing that their concerns would not be received openly or that they would be subject to rebuke or negative consequences.

6.24 This reluctance was likely amplified by the Federation's immediate and strongly defensive response to the review's triggering. Its dismissive labelling of those raising concerns as "*vexatious*" revealed an unusually defensive posture. If this attitude reflects the prevailing culture, it readily explains why so many were afraid to engage with the school directly. For the record, I found no evidence to support or justify the Federation's conclusion that the concerns were vexatious.

6.25 Furthermore, several individuals that I interviewed reported that the school's leadership response tended to emphasise the school's excellent results and high attendance

rates, while appearing less receptive to any criticisms being raised. While such outcomes are rightly a source of pride, the focus on reputation in this context does not diminish the genuine motivations of those who came forward.

- 6.26 Every teacher and former teacher I spoke with emphasised that MVPA is, in many respects, an excellent school. Their concerns were not about the overall model, but about how the behaviour policy was being applied, particularly to pupils whose needs required greater sensitivity and reasonable adjustments. For this minority, the policy was sometimes experienced as overly rigid, at times even punitive, in ways that could be counterproductive or distressing.
- 6.27 Several contributors suggested that the difficulty lay not with the behaviour policy itself, but with the manner of its implementation. A group of senior leaders appeared hesitant to apply the principle of flexibility implied in the mantra “*rigidity with flexibility*”. In some instances, this created a culture where maintaining strict control took precedence over professional judgement or adaptive approaches of firmness and empathy that the policy aspires to promote.
- 6.28 The rigour of this implementation was firmly supported by the leaders I engaged and through their overall approach to the review. Indeed, the CEO and senior leaders at MVPA presented a united and defensive posture, interpreting the external scrutiny of the review as a direct attack on their reputation. They consistently denied, deflected, and challenged the review's legitimacy, often using the school's high academic results to justify their methods and sidestep concerns raised by the wide range of stakeholders.
- 6.29 They showed a culture of plausible deniability, where leaders claim ignorance of specific issues, shift accountability, and dismissed concerns for their anonymity and lack of specific details such as dates, names, and witnesses. There was a hubristic tone to their approach.
- 6.30 The leadership team's testimony revealed a strong belief in strict discipline and an unyielding focus on academic outcomes. Admissions of a culture of “*tough love*”, a “*healthy fear of academic failure*”, scrutiny of teacher sanction rates and shouting as a public performance were acknowledged and justified as necessary tools for maintaining order.

- 6.31 As one senior leader told me, he could totally see a place" *where a child would be sanctioned for turning around looking at the clock, dropping something on the floor, or looking out the window*". He argued that failing to sanction these things is "*failing children*" because it teaches them that it doesn't matter. There was a biblical like sense that 'fear was the beginning of wisdom'.
- 6.32 *Appendix 4* provides a more detailed critique of the application of 'healthy fear' as a behavioural model.
- 6.33 The evidence in this context suggests a leadership that appears to be in a state of denial. Senior leaders were either unable or unwilling to share detailed, analytical data on key sanctions, leaving governors without sufficient information to fully assess the impact and effectiveness of the behaviour policy and whether there was any overrepresentation in the Behaviour Support Unit and sanctions (such as desking and detention).
- 6.34 The apathetic response to such issues, combined with a rigid, top-down approach, indicates to me a cultural problem rather than individual misconduct. The school's leadership prioritises compliance and control above all else, resulting in too many pupils being let down. Leadership sets the tone and members and trustees need to consider carefully the influence of this culture.

### **Specific Practices and Issues of Concern**

- 6.35 Having evaluated the wide range of evidence available to me, it is reasonable to conclude that several specific practices and issues of concern can be substantiated. These involve the following.
- Shouting
  - Placing children on desks in corridors (*Desking*)
  - Behaviour and SEND
  - Mental Health
  - The Behavioural Support Unit and the Alternative Provision Centre
  - Disproportionality
  - Training on behaviour policy implementation
  - Accountability and Governance
  - MVPA's response to complaints
  - The management of allegations against staff and volunteers

## Shouting

- 6.36 The latest DfE guidance emphasises that teachers should strive to maintain respect for pupils' dignity, including considering the environment when addressing misbehaviour. While raising one's voice to gain attention or manage a situation can sometimes be necessary, shouting at pupils in a way that is abusive, threatening, or intended to humiliate them is not acceptable.
- 6.37 Many of the initial accounts submitted to the CSPR and the comments made to me in interviews described incidents of shouting. Teachers and former teachers stated:

*"I observed frequent instances where pupils were screamed at for minor infractions, fostering an oppressive environment that, in my view, was deeply harmful to their well-being."*

*"A white female teacher started to scream at a male pupil. I heard the shouting in a playground that was full of pupils and all staff and was horrified to the extent that I complained to my line manager and the then [senior leadership role]."*

*"The senior leadership team would regularly shout into children's faces - other teachers didn't do this and I refused to do it myself. I remember a senior teacher getting down to a child's level and screaming at them."*

*"Children would be screamed at for turning to look at a clock, or for taking a pen from a bag without asking. In a year 7 assembly in the first week of term I witnessed 2 or 3 new pupils fainting in line as a result of being screamed at."*

*"I do not shout. It was frequently made clear to teachers by the SLT that empathy was considered a weakness, and that raising your voice was a requirement. ... I don't think I was ever spoken to in anything other than a raised voice by the SLT, but this wasn't just me – many teachers were regularly shouted at."*

*"I regularly witnessed senior members of staff at MVP shouting at pupils in a humiliating manner. The shouting of the staff member was often so loud that it was audible from a long way away, which had the effect of intimidating other pupils."*

*"Previous employee at MVP and I must say the treatment that many pupils have endured whilst attending this academy is dreadful. I have personally witnessed many occasions where teachers are screaming at the pupils directly into their faces,*

*centimetres apart for a pupil turning around, not having a green pen, their pen running out, looking at another pupil, forgetting their book, looking at the clock, the list is endless.”*

- 6.38 There were many more references to teachers shouting. In the accounts that were given, including from some who did not believe this review was necessary, a small number of teachers were mentioned as being responsible for shouting and influencing the culture at MVPA. In the main, these teachers were identified as senior leaders.
- 6.39 The CEO of the Federation was very clear in his response to concerns about shouting. He distinguished between shouting and humiliation, stating that while he does not personally shout, he does not see anything inherently wrong with it, if it is not used to belittle or coerce.
- He emphasised that shouting should not be used to humiliate or exert controlling dominance over pupils.
  - He recalled past experiences with effective teachers who were known for shouting but did not associate it with poor teaching.
  - He acknowledged that there is an ongoing internal debate among senior leaders about the appropriateness of shouting, reflecting differing views within the school’s leadership team.
  - He pointed out that coercive control can occur with or without shouting and should be addressed regardless of tone or volume.
  - He encouraged formal reporting and emphasised the importance of whistleblowing procedures to address such incidents properly.
  - He stated he had not observed or sanctioned public shouting episodes, but reiterated his openness to investigating any specific, evidenced reports.
- 6.40 In summary, while shouting is not institutionally encouraged, it is also not explicitly banned, and the leadership appears divided on its appropriateness. The critical line, according to the CEO, is whether shouting is used for humiliation or control, which would be deemed unacceptable and investigated if reported.
- 6.41 Regarding the CEO’s conduct, a senior colleague commented: *“I’ve never heard him shout at a child ever... He gets respect just by looking. You don’t have to shout.”* Yet, a separate concern was raised that the CEO tolerates inappropriate shouting from colleagues, creating a risk that this behaviour will be modelled by younger teachers.

- 6.42 The Chair of the CFB understood shouting was an issue. He acknowledged hearing about excessive shouting and despite him confirming the matter had been discussed at the CFB, I could find no commensurate reference to this in the minutes I examined. He said there was “*something in this*” and stated that further review was underway.
- 6.43 The Chair of MVPA’s LGB made a clear distinction regarding shouting, noting that shouting directly at individual pupils at close range was unacceptable. She conceded that some staff were known to be “*shouty*,” identifying two or three such individuals during my interview with her. Despite this, she maintained that the behaviour was neither systemic nor planned.
- 6.44 The safeguarding lead for the CFB adopted a measured but critical perspective on the issue of shouting, differentiating between a momentary loss of temper and systematic, humiliating shouting used for discipline. She expressed particular concern over reports of children being deliberately screamed at in public areas (like the Huguenot Hall) and said she has repeatedly sought assurance that such conduct is addressed and reprimanded. She further stated she had raised this issue through both governance and safeguarding channels in the Federation. While accepting that shouting may happen, the safeguarding lead stressed that its nature and intent are crucial, distinguishing emotional lapses from what she views as unacceptable, institutionalised practices. She acknowledged that shouting had reportedly reduced since the review began, but considers its punitive or theatrical use a serious cultural issue requiring ongoing oversight.
- 6.45 As part of the evidence gathered for the review, a Member of the Federation reported to me personally witnessing unacceptable shouting directed at some boys, which they subsequently reported to the CEO. The Member’s concern was said to have been dismissed with the comment that they were overstepping their role and that the shouting teacher was seen as a good teacher by many of the pupils.
- 6.46 This same Member emphasised that while many staff were well-meaning, some interpreted “structure” as a justification for bullying or rudeness, rather than supportive discipline. They stated: “*The bad things are the shouting... it’s about the interpretation by some people who use it as a kind of justification for what is really bullying and rude behaviour.*” They supported the idea that training and stronger modelling of positive behaviour management is needed, citing excellent staff as potential internal role models.

- 6.47 Perhaps the most revealing insight was provided by a senior leader at MVPA, who confirmed they may shout in public when a student is misbehaving to gain attention or validation from their peers. In such instances, the shouting, I was informed, acts as a public performance to signal clearly to everyone that the unacceptable behaviour is being addressed and will not be tolerated. This candid admission that shouting is deliberately employed as a tool for public reprimand (which inherently entails public humiliation to deter other pupils) is consistent with the many accounts shared with the review. Taking an objective view, I find it hard to accept that this practice is isolated to this single individual.
- 6.48 Overall, compared with the DfE's guidance—which states that shouting at pupils should not be a regular feature of classroom management and that governors must ensure behaviour policies are implemented with respect and consistency - the responses of the senior governors I spoke with reveal varying levels of concern and oversight. The Chair of the Federation Board stated, "*I am not aware of shouting being raised as a particular issue,*" suggesting a lack of direct scrutiny on the matter. The MVPA Chair of Governors acknowledges that some staff have a "*reputation for being shouty*" but asserts that shouting is not "*part of a plan,*" indicating limited engagement with its prevalence or impact. In contrast, the safeguarding governor takes a more proactive stance, distinguishing between occasional outbursts and targeted public humiliation. They describe having "*repeatedly asked*" for assurance that any staff who shout abusively are reprimanded and has escalated concerns via safeguarding channels. Overall, while this response aligns more closely with DfE expectations, the more passive or dismissive positions suggests a governance system that is not meeting the DfE's standard for behavioural oversight.
- 6.49 In conclusion, there is substantiated evidence that shouting at pupils does take place at MVPA, a finding supported by consistent testimony and partial acknowledgement from school leaders. The way this occurs on some occasions - being public, excessive, and directed at individuals - meets a reasonable definition of humiliation. Although not every teacher engages in this behaviour, and despite testimony suggesting only a small number of teachers are involved (some of them very senior), the evidence indicates a cultural problem rather than rare individual lapses.

### **Placing children on desk ('Desking')**

- 6.50 "*Desking*" is a sanction used at MVPA that involves the removal of a pupil from their classroom and placing them at a desk in a corridor outside the room of a senior teacher. It was reported as being used as a punishment for a range of infractions,

including minor ones such as forgetting equipment, looking at the clock, having the wrong uniform, or even having "*brown Vaseline instead of a blue one.*" As one senior teacher told me, staff are advised "*if you think it is wrong, then it is*" and "*when in doubt, send out*".

- 6.51 The practice of desking has been linked to significant concerns about pupil welfare, learning, and equity, with particular attention to its disproportionate impact on vulnerable children. Claims were made by some that desking disproportionately affects "*Black working-class boys*" and pupils with SEND.
- 6.52 For my review, MVPA were either unable or unwilling to provide any data on the incidence of desking or an analysis of its impact on children by characteristics of age, gender, ethnicity, pupil premium and SEND. In this respect, I was unable to interrogate the circumstances as deeply as I would have hoped. That's said, many of the accounts shared with me point to a range of credible concerns.
- 6.53 One report shared with me detailed a pupil being forced to sit in a lecture-style chair with a foldable table in various locations - facing forward in silence and punished if they moved or spoke. These locations are described as silent, isolating environments where pupils are reportedly given little to no work, or work that is of a much lower quality than they would receive in class.
- 6.54 A long-term teacher critically described desking "*as a highly visible, shaming practice.*" One parent described the visible placement of children as "*appalling,*" adding that it is "*tantamount to bullying and harassment*" because it is embarrassing. The pervasive feeling of being watched by peers and staff in a public setting contributes to a sense of humiliation and shame. Staff are also reportedly instructed not to speak to pupils on desks, which further exacerbates their isolation and lack of support. The absence of meaningful engagement and the physical constraints can create a deeply negative and unproductive learning environment.
- 6.55 Through my interviews, there was a significant discrepancy between leadership comments and the accounts of some staff about the length of time pupils are placed on desks. While a staff member was unaware of a child being on a desk for more than a day, other accounts suggest pupils have been placed there for "*four or five days*" or even more.

- 6.56 A staff member confirmed to me that a pupil's placement on a desk could be extended due to a parent's failure to attend a meeting, effectively punishing the child for the actions of their parents. This raises serious questions about the fairness and ethical implications of holding a child responsible for factors outside their control, turning a supposed short-term intervention into an extended and punitive measure.
- 6.57 The use of desking, combined with frequent detentions and a generally "harsh environment," has been linked by some to increased pupil anxiety and depression. An ex-pupil recounted having a panic attack while on a "*time-out desk*", and other accounts have mentioned instances of self-harm and suicidal ideation directly related to the school's disciplinary regime.
- 6.58 The feeling of constant scrutiny and the public humiliation of desking creates an environment that potentially harms a pupil's mental and emotional well-being. The lack of supportive interaction from staff reinforces a sense of hopelessness and abandonment and is likely to make it difficult for some pupils to cope with the stress of the punishment.
- 6.59 Senior leaders, including the Principal, describe desking as a short-term solution to investigate incidents. In stark contrast, other staff, ex-pupils, parents and several teachers with whom I spoke describe it as a punitive measure for "*petty things*." Overall, the evidence reveals a disparity between the official rationale for "desking" and the experiences reported by others.
- 6.60 A Leadership Management Advisor from Hackney Education stated they had "*never heard the term desking*" and found it "*unusual in any secondary school*" to have children placed with senior leaders as a form of internal exclusion. They speculated that it could be a method for managing an internal exclusion process for children who might not handle being in an exclusion room all day, but their comments still highlight the unconventional nature of the practice.
- 6.61 Several accounts also indicated that desks are cleared or moved when "*high-profile visitors*" are on campus, raising concerns that the school is attempting to conceal the practice. While senior leaders claim this is done to prevent distractions for pupils, the perception among others is that it's a blatant attempt to hide what is happening, raising questions about the school's transparency.

- 6.62 The DfE guidance on behaviour places a significant emphasis on the duty to record all removals and instances of isolation. It sets out that schools should track:
- The reason for the removal from the classroom.
  - The length of time the pupil was removed.
  - The supervision provided.
  - The follow-up action taken.
- 6.63 This data should be used to monitor patterns, identify pupils who are frequently removed, and assess the effectiveness of the behaviour policy. Governing bodies have a significant role in reviewing this data. The guidance means that academies, must have regard *to* it when designing and implementing their behaviour policies. Having the 'regard' means they are legally obliged to consider it carefully and follow it unless there are exceptional reasons not to. They cannot simply ignore it.
- 6.64 Governors reportedly do not receive information on how many children are placed on desks, limiting their ability to exercise proper oversight and accountability. This lack of transparency and a potential divergence from established guidance suggest governors need to review how they monitor implementation of the behaviour policy.
- 6.65 In conclusion, while school leaders frame the practice of desking as a necessary, short-term measure for managing behaviour, the broader accounts describe a rigid, disproportionately punitive system that can negatively affect pupil well-being and academic progress, particularly for vulnerable groups.
- 6.66 These concerns, further underscored by external professional comments and governor feedback about the lack of scrutiny, suggest a transparent review of the consistency, fairness, and overall impact of the school's policy of placing pupils on a desk is needed.
- 6.67 Without data on the extent and impact of placing children on desks, governors cannot assess its effectiveness and appropriateness. Furthermore, they cannot determine if the practice raises concerns about its alignment with the school's stated behaviour policy or its impact on pupil dignity and well-being. More detail on the DfE's expectations for removing children from classrooms can be found in *Appendix 5*.

## Behaviour and SEND

*"Leaders have created a school that is safe from hazards and orderly. However, the consistent application of the discipline system means that some pupils and parents feel that the culture in the school is not nurturing. Some pupils spoke of the issues they faced in the wider community and their lack of confidence in sharing this information with school staff. Other pupils felt that staff were only concerned with their academic progress rather than their emotional well-being and therefore they are reluctant to share any concerns."* Ofsted 2016.

- 6.68 This section of my report synthesises evidence from various sources - including parent, teacher, and professional accounts, as well as external reports - to provide an analysis of the application of MVPA's behaviour policy as it relates to pupils with SEND. It identifies several key themes, highlighting contradictions between different accounts and further evaluating the school's practices against DfE guidance.
- 6.69 At the outset, it is important to acknowledge the high number of positive accounts that I had access to that presented a positive view. These are clear that for some pupils, the school's structured and disciplined environment has been beneficial. For example:

A parent of a son with ASD said he had "*absolutely excelled*" due to the support he received from the SEN team.

Another parent of two neurodivergent children with ADHD and autism said that the school's structured environment has helped their children to thrive.

A parent of a child with a severe anxiety disorder, who is on the SEN register, found the structured routine to be "*very helpful*."

In one instance, a parent of a child with narcolepsy praised the school for being proactive in understanding the condition and suggesting "*reasonable adjustments*."

A parent of a child with anorexia and bulimia said the school supported their efforts to get her into the care of CAMHS and responded to her needs, including hospital appointments.

Another parent reported that the school noticed their child's anxiety, provided support with a counsellor, and "*swiftly referred them to CAMHS*."

- 6.70 The average pass rate at GCSE for children with SEND is significantly higher than the national average for all children, and most families have found MVPA to be supportive and accommodating toward their child. Others, however, have experienced significant challenges, indicating a potential inconsistency in the implementation of policy and a reliance on individual staff members for positive outcomes.
- 6.71 In January 2023, Ofsted's inspection stated: *"Leaders support pupils with SEND to follow the same ambitious curriculum as other pupils. They identify and support these pupils' needs extremely well. Staff use highly effective strategies to help pupils with SEND so that they can achieve well. Teachers have an in-depth knowledge of individual needs for pupils with SEND."*
- 6.72 That said, a significant and recurring theme across accounts relates to the disproportionate and inflexible application of the school's disciplinary system as it relates to pupils with SEND and neurodiversity. The sanctions system is described as weighted against these pupils, with teachers reportedly instructed to treat all pupils the same, irrespective of their specific needs.
- 6.73 This approach stands in direct opposition to DfE guidance, which mandates that schools make reasonable adjustments for pupils with a disability and that any sanction must consider a pupil's age and any special educational needs they may have. Some staff and parents have highlighted that pupils with SEND are often punished for behaviours directly related to their disabilities.
- 6.74 A parent of a child with autism spectrum disorder (ASD) and attention deficit hyperactivity disorder (ADHD) also noted their child became *"very anxious about attending school due to continuous sanctions and detentions"* for behaviours that were a direct result of their condition. Similarly, a headteacher from another school reported that an 11-year-old autistic boy received numerous escalating sanctions, including two fixed-term exclusions, for seemingly minor incidents like *"repeatedly trying to touch pupils' shoes."* This pattern is not limited to singular events; a parent of a dyslexic son stated their child received no specific support and was frequently in detention for disorganisation, a common struggle for people with dyslexia.
- 6.75 Furthermore, a professional account highlighted a *"complete lack of willingness"* to make necessary adjustments for children with SEND, arguing that the school's behaviour policies are fundamentally unsuited for an inclusive environment. A senior teacher corroborated this, stating that a plan to bring in an educational psychologist to

provide training on autism and ADHD was blocked by a senior leader as it was "*not aligned with the school's ethos.*"

- 6.76 The issue of inflexibility extends to the use of basic sensory tools. Despite a very senior leader telling me that MVPA works with external agencies and implements appropriate adjustments for pupils in need, there was a very different account provided by other teachers I spoke with. One reported that advice from CAMHS regarding time-out cards and fidget toys was simply not being followed. Another staff member went further, claiming they were told to "*hide the fact*" they were giving pupils Blu-Tack, an item recommended by CAMHS, because a very senior teacher "*doesn't like blue tac.*" These anecdotes reveal a micro-level culture of dismissal toward expert advice and a prioritisation of rigid policy over a pupil's individual needs.
- 6.77 Indeed, this vein of inconsistency runs throughout the accounts, particularly concerning the school's public statements versus its internal practices. These contradictions involve senior leadership, staff, parents, and external professionals, pointing to a potential lack of transparency and a disconnect between official policy and lived experience.
- 6.78 Members of the school's SLT described the school's behaviour policy as "*rigidity with flexibility,*" asserting that responses are tailored to individual needs. This is directly contradicted by other staff, who state that this rigid approach fails to account for neurodivergent pupils and that adjustments are often left to a teacher's professional judgment, with the prevailing philosophy that a need is "*not an excuse.*"
- 6.79 This creates a culture of inconsistency where some teachers may provide support, while others adhere strictly to the policy, leading to an unpredictable and stressful environment for pupils. One teacher reported a senior leader quipping "*don't forget it is rigidity with inflexibility*".
- 6.80 A senior teacher gave testimony with a nuanced yet critical perspective on the behaviour policy. Their primary concern is the rigid and disproportionate application of sanctions, particularly the prolonged use of isolation. They criticised MVPA's justification of isolation as building resilience, citing a case where a Year 8 boy spent five days on a desk for a minor infraction. They believe this approach prioritises compliance over pupil welfare and safeguarding.

- 6.81 Despite these criticisms, they acknowledged the value of the policy's intent. They agreed that a consistent structure is beneficial for some pupils and prevents chaos. Their perspective is pragmatic; they advocate for a more nuanced implementation, including staff training in trauma-informed care and making reasonable adjustments for pupils with SEND. This is far from unreasonable. Their testimony, which both substantiates concerns and provides concessions, is a pivotal and sensible voice for reform. In this context, it is harder for leadership to dismiss this input as simply opposition from a disgruntled individual.
- 6.82 DfE guidance is explicit that if a pupil has an EHCP, the provisions set out in that plan *"must be secured."* However, I was told by several professionals with whom I spoke (and via written submissions) that this was not the case at MVPA. A teacher reported that the legally binding Section F of EHCPs was not being followed in some cases, and another staff member claimed that pupils with EHCPs were not provided with Teaching Assistants (TAs) in class, despite the funding being available.
- 6.83 Several teachers also noted a significant decrease in the number of TAs, leaving pupils with EHCPs without mandated support. One staff member reported being instructed to *"build evidence that this isn't the right place for this pupil to be"* for a pupil with an EHCP, suggesting a potential institutional pressure to remove certain pupils.
- 6.84 Several accounts suggest the school may have engaged in practices that could be considered off-rolling, which is the practice of removing a pupil from the school roll without a formal exclusion. A headteacher from another school reported that a family felt they had *"no option but to move their son"* after a *"relentless regime of punishments"* and that the school had suggested the parent's home-educate the child while keeping them on the school roll. This is against DfE guidance on managed moves, which states they *"should only occur when it is in the pupil's best interests."*
- 6.85 A very senior official from an external agency described leadership at MVPA as having an *"it's their way or the highway"* mentality, with no room for negotiation on rules. He explained that a child's response to a teacher's shouting could be a *"freeze trauma response"* and that policies should be inclusive to account for children who have experienced trauma. Such an approach is aligned with the DfE's guidance on considering contributing factors when responding to behaviour. This contrasts sharply with the school's alleged dismissal of such advice.

- 6.86 The evidence presents a complex and polarised picture. On one hand, there are multiple, detailed accounts from parents, staff, and external professionals suggesting a rigid, punitive, and often disproportionate disciplinary system that may not adequately support pupils with SEND and neurodiversity. The practice of desking and the alleged dismissal of external professional advice are significant points of concern, potentially indicating a systemic failure to make reasonable adjustments as required by DfE guidance.
- 6.87 On the other hand, many parents have provided positive feedback, describing the school as supportive and effective for their children with similar needs as those who raised concerns. These positive experiences, however, appear to be highly specific and, in some cases, may be dependent on individual staff members rather than a consistent, school-wide policy.
- 6.88 The stark contrast between these two narratives highlights an issue of inconsistency. While most pupils and families may thrive in the structured environment, others seem to be severely let down by a system that is experienced as inflexible, unresponsive, and, in some cases, potentially harmful. Governors need to consider and understand the root causes of these disparities and to ensure that the school's practices align consistently with both DfE guidance and the best interests of all its pupils, including those with SEND.

## **Mental Health**

- 6.89 In 2025, the Federation's Risk and Controls Committee reviewed a report detailing the causes for concern identified in safeguarding cases covering the last two academic years. Data was presented in the form of a table and covered all the Federation's schools in Hackney. The total number of concerns identified in this cohort was 3,406 in 2023-24 and 3,911 in 2024-25.
- 6.90 Significantly, the data showed that in 2024-25, MVPA identified 511 more concerns than its sister school, Mossbourne Community Academy (MCA). It also identified more than double the number of mental health concerns, recording a total of 708 compared to 348 at MCA. The mental health data showed a 17.4% increase at MVPA from the previous year.
- 6.91 The disparity between the two academies was discussed at the Committee, with it being noted that the higher reporting by MVPA was a trend that had been continuing

over the last two years. The Committee recorded that it had not been possible to identify the exact reason for this.

- 6.92 With regards to the specific issue of mental health, the meeting heard that the external agency data evidenced appropriate levels of cases were being escalated for referral and that data may indicate over-vigilance (by MVPA staff) in initial reporting. It also heard that this, *"reflected multiple positive conversations being held with students around their wellbeing and a robust safeguarding culture. Increased mental health concern data also reflected the national picture, and the normalisation of mental health vocabulary and diagnoses accessed via social media."*
- 6.93 Whilst relevant to consider these hypotheses and issues, in the context of the Risk and Controls Committee meeting being held in the months after this review was triggered, alongside the Federation being alert to the nature of the concerns that had been raised, I was somewhat surprised at the absence of any discussion about whether MVPA's own operating environment was a contributing factor exacerbating the increase in identified mental health needs.
- 6.94 Furthermore, while the CEO recommended that *"specific trends, such as the high levels of mental health, should be reviewed by an external party,"* I am unaware if this has been actioned. If it has yet to be, then Members should request the Chair of the CFB commission one with a prominent role for independent specialists.
- 6.95 Other perspectives on this issue were provided by some of the practitioners I interviewed. Many held firm views on this issue. They believed there was a correlation to the application of MVPA's behaviour policy, pointing to what was described as a rigid and uncompromising culture.
- 6.96 This rigidity was also described as being evident in the school's response to professional advice. CAMHS practitioners mentioned that recommendations for simple adjustments to help a child regulate are often dismissed with the blanket statement, *"we just don't do that."* Furthermore, when a suggested intervention fails, the school often waits until a review meeting to report - *"Well, we tried it. It didn't work. So, we stopped"* - rather than communicating immediately to collaboratively find an alternative.
- 6.97 The perception from these practitioners was that the school's culture is one that has the clear potential to accentuate mental health issues. For example, children have reported to CAMHS practitioners that the environment feels hostile. For vulnerable

pupils, such as those with SEND, mental health needs or a history of experiencing domestic violence, shouting was explained as being a potential trigger that can cause some to be absolutely traumatised and freeze. It was explained that this "freeze" is a trauma response, where children close down and simply try to survive in the classroom to avoid being shouted at or getting into trouble.

- 6.98 One parent I spoke with said that they know the school is academically successful for the majority, but this success hides the "*collateral damage*" to a "*small but not in insignificant number of children who don't fit into one way of doing things.*" They also told me that despite their child being out of school for months due to anxiety, he was removed from a lesson and sent home because of his haircut. The parents told me their child was also shouted at (for not giving 24-hour notice of an appointment to see his psychologist) and given a sanction for his pen not working.
- 6.99 The external critique of MVPA's approach was specifically echoed by Hackney's Multi-agency Safeguarding Hub (MASH), which has noted the disproportionately high number of referrals from Mossbourne Academies, specifically related to child mental health. A 2023 snapshot found MVPA to have the highest number of referrals.
- 6.100 Of particular concern was that these referrals often related to relatively minor behaviour issues, frequently referenced a high number of detentions, and in some cases were made without parental consent, reflecting weaknesses in the school's understanding of both expected and good practice in this context. This problematic environment was also seen as being compounded by MVPA's resistance to external training. I expand on this point later in my report.

## **The BSU and APC**

- 6.101 The Ofsted inspection in 2016 found that "*The 'behaviour support unit' is used for those pupils who have not adhered to the behaviour policy. These pupils are regularly sent to the 'BSU'. Some pupils spent lengthy periods of time there, including those pupils who have returned from being excluded from school. Pupils work silently and there are limited opportunities for them to reflect on their behaviour or be supported in their learning.*"

### **The Behaviour Support Unit**

- 6.102 The Behaviour Support Unit (BSU) is an internal facility at MVPA designed for up to nine pupils. Its primary function is to manage students who have been removed from mainstream lessons due to disruptive behaviour. The BSU is utilised for conduct that

exceeds the scope of standard detention, such as persistent rudeness or repeated disruption. Pupils are typically placed in the BSU for five days, although this period may be extended for some. Furthermore, it assists in the re-integration of pupils returning from suspension, offering them a one-day adjustment period before they resume mainstream classes.

- 6.103 The Principal of MVPA explained to me that the BSU functions both as a sanction and as a support mechanism. He said it helps pupils amend their behaviour so they can re-engage successfully with learning. He acknowledged that more Black boys attend the BSU but argued this results from higher levels of rule-breaking - either repeated breaches or more serious incidents - rather than discriminatory practice. The behaviour policy, he stressed, is applied consistently to all pupils.
- 6.104 Pupils are provided with lunch in the BSU room, and normal facilities (e.g. toilet access) are available. Pupils are placed there until they have a parental meeting to discuss the incident. The unit also aims to provide guidance and support to help pupils develop their social emotional skills, manage their emotions. This support appears to be delivered on an ad-hoc basis.
- 6.105 There is a coordinator for the BSU who is managed by a Head of Year. The coordinator's primary duties are logistical, including collecting pupils, liaising with teachers to secure work, and supervising pupils during breaks and lunch. Teaching cover is provided by members of the SLT, who rotate supervision across the 50-minute periods. Crucially, the unit lacks a consistent, dedicated teacher or a trained behaviour specialist. Furthermore, staff members confirmed there is no specific training on behaviour management for those overseeing the BSU.
- 6.106 I was told that the SLT teachers covering the BSU face challenges due to the mixed-year grouping within the small unit, which complicates the organisation of appropriate learning materials. It is also unclear whether the supervising teacher simply monitors the work set by other teachers or attempts to teach the mixed group as a single lesson.
- 6.107 The BSU's success appears to be measured by a single, binary metric: whether a pupil re-offends and returns to the unit. Each 50-minute period is graded by the supervising SLT member as either *acceptable* or *unacceptable*. Staff testimony, however, suggests the unit is not effective in preventing repeat offences, with some children returning on multiple occasions, in some cases up to six or seven times. No official data was available to assess the unit's success rate.

- 6.108 From the evidence available, the BSU does not seem to be characterised by specialist behaviour staff with an ongoing programme of professional development, and its primary function does not appear to be rehabilitation. There does not seem to be any structured follow-up or specialised intervention for pupils after they leave the BSU.
- 6.109 Teachers and staff comments made to me indicated an overrepresentation of pupils from disadvantaged backgrounds and those from Black and Global Majority groups. The overrepresentation of Black boys was acknowledged by MVPA; however, the only specific explanation offered was that the offences committed by Black boys were considered more "*serious*," attributing the wider issue to a national problem faced by all schools.

### **The Alternative Provision Centre**

- 6.110 In my interview with the CEO, he was clear that the BSU and the APC are "*quite different things*." He stated that the APC is additional provision and that there is no direct, automatic link where a pupil is sent to the APC after spending a certain number of days in the BSU. The Principal of MVPA said, "*the APC is an additional provision. there's no sort of... if you you've spent this many days in the BSU, so you are now going into the APC they're not a direct link*." The Vice Principal explained that the APC was one of the options for a pupil removed from a classroom, alongside working on a desk or in the back of another classroom. There may not be a direct link between the arrangements, but others told me that some pupils are moved from the BSU to the APC.
- 6.111 The APC is a small, separate unit for a maximum of six Pupils in Years 9-11. It is led by a Head who is also a learning support teacher. Its primary purpose is to provide short-term support for pupils at risk of exclusion, with repeated suspensions, or with significant attendance issues, with the goal of reintegrating them into mainstream classes. For some Key Stage 4 Pupils, it becomes a longer-term solution to ensure they remain in education. It has one teacher, tailoring individual timetables and curricula from mainstream while also providing social and emotional support.
- 6.112 Placement is made by the Head of Year, SENCO, and pastoral team via a referral form that sets specific targets. A meeting with parents takes place to ensure transparency. The vision is for short-term placement to reintegrate them back to mainstream, though for some Key Stage 4 pupils, it can be longer-term if it's the best option for them. The building is separate from the main school, and the school day starts later and finishes earlier.

- 6.113 Success is measured through phased reintegration into mainstream, monitored via teacher reports and pastoral support. An "exit report" is provided for reintegrated pupils, which outlines strategies for mainstream staff.
- 6.114 The cohort was described as a mixture of genders and ethnicities. No data was provided but the Head of the APC told me they had not observed a particular over-representation in their time.
- 6.115 Multiple teachers identified shortcomings in the APC. One described a pattern where pupils would be put into the APC, then partially reintegrated, only to fail again and be sent back, creating a "revolving door" effect without addressing the root causes of the behaviour, often linked to unmet SEND needs.
- 6.116 As with the BSU, they also identify a lack of specialist behaviour support in the APC. There are shared concerns that the APC was not adequately staffed or resourced to deal with the complex needs of the pupils placed there. It was questioned whether it was truly a "specialist unit" or just another, quieter removal room.
- 6.117 Some teachers questioned whether the APC was being used inappropriately for pupils with SEND, particularly autism. They suggested that the environment and teaching style were often not adapted to their needs, leading to further distress and failure for those pupils. Concerns were also raised that pupils in the APC suffered academically, as their curriculum became too narrow and they missed out on the breadth of subjects and social interaction of mainstream classes.
- 6.118 Others identified the APC as a good resource, but it is challenged to achieve good outcomes with only one leader (who also acts as a learning support teacher) and the occasional support of a learning support assistant.
- 6.119 In summary, both the BSU and APC provide structured removal from mainstream lessons, but their effectiveness may be limited by a lack of specialist staffing, inconsistent provision, and insufficient evaluation. The BSU risks functioning primarily as containment rather than meaningful intervention, with repeated use suggesting limited long-term impact. The APC has a clearer framework and more defined processes, but resourcing and expertise for the specific needs of pupils may be a weakness.

- 6.120 Apart from the two Ofsted inspections, as far as I am aware, there has not been any external or independent review of the BSU or APC over the period covered by this review. There may have been internal reviews, but if so, they were not offered to me. Furthermore, no detailed data was made available to me to analyse.
- 6.121 Governors and trustees should require senior leaders to provide regular oversight of both units, establishing clear accountability for pupil outcomes and ensuring alignment with DfE guidance on behaviour and inclusion. Data must be systematically collected and scrutinised by governors, covering placement, duration, repeat use, and pupil demographics.

## Disproportionality

- 6.122 Beyond suspensions and permanent exclusions, there is no evidence that senior school leaders or governors have been routinely scrutinising the significant volume of data held on the other sanctions that MVPA issues to pupils. Moreso, there is no evidence that the entirety of this data has been considered against protected characteristics or through an 'anti-racist' lens to ensure duties are being met under the Equality Act 2010. My evaluation, using government guidance to measure relative likelihood<sup>1</sup>, indicates that children with SEND and some ethnic groups are disproportionately represented in the data based on their population sizes.
- 6.123 For SEND pupils, they are significantly represented in MVPA's data, accounting for 34,900 (27.4%) of all recorded incidents. Based on a population cohort of approximately 16.6%, SEND pupils are around 1.9 times more likely to be recorded as being involved in an incident than their non-SEND peers. For sanctions that result in a defined action (excluding recording anomalies, NULL or '*no action required*' entries), the relative likelihood is similar at around 1.8. This means that SEND pupils are nearly twice as likely to be involved in an incident at MVPA and twice as likely to receive a sanction because of it. The data raises questions regarding the potential sufficiency of support, curriculum accessibility and staff understanding and confidence in SEND-related provision.
- 6.124 MVPA's data also illustrates evidence of disproportionality when measured against the school's ethnic population breakdown<sup>2</sup>. The data shows that pupils of White ethnicity accounted for 31,386 of all incidents (24.6%), with 26,235 resulting in a sanction. From

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<sup>1</sup> <https://www.gov.uk/government/publications/using-relative-likelihoods-to-compare-ethnic-disparities/using-relative-likelihoods-to-compare-ethnic-disparities>

<sup>2</sup> The ethnicity data for MVPA's pupil population was sourced from the DfE [here](#). Calculations have used population percentages that have been averaged over the last three years.

a school population averaging 38.5%, this data formed the baseline for relativity (i.e. 1.0) when comparing with other ethnicities.

- 6.125 For Black Caribbean pupils (6% average population), they were involved in 12,420 incidents (9.7%) and received 10,465 sanctions. They are approximately 2.6 times more likely to receive a sanction compared to White pupils. Black African pupils (16.5% average population) were recorded against 30,041 incidents (23.5%) and received 25,467 sanctions. They were 2.3 times more likely to receive a sanction compared to the White pupils. For the entire Black and Global majority cohort at MVPA (61.5% average population), they were 1.9 times as likely to receive a sanction.
- 6.126 A total of 3,138 Behaviour Support Unit (BSU) placements and 408 Alternative Provision Centre (APC) placements were recorded as sanctions in MVPA's data. Their distribution across ethnic groups gives rise to some of the most serious concern within the dataset, revealing a significant disproportionality in how these measures are applied.
- 6.127 Black Caribbean pupils are 5.1 times more likely, Black African pupils are 4.4 times more likely and all Black and Global Majority pupils, 3.2 times more likely to receive a BSU or APC sanction compared to White pupils. These data represent the highest level of disproportionality among the data analysed and suggest that incidents involving Black pupils are substantially more likely to escalate to the highest level of action compared to their White peers.
- 6.128 This disproportionality, all of which is 'statistically significant' and 'notable', requires a reflective and forensic response by school leaders and governors. The data cannot, on its own, ascribe cause; however, the scale of the disparity calls for a rigorous review of practice, training, decision-making processes, and the cultural factors that may be shaping escalation thresholds as they relate to MVPA's behaviour policy.

## **Training on Behaviour Policy Implementation**

- 6.129 A behaviour policy is only as effective as the staff who implement it. In this respect, teachers and support staff at MVPA need relevant training, resources, and ongoing support if the school's behaviour policy is to achieve its aims. DfE guidance emphasises that high standards depend on a whole-school culture, consistent routines, and staff who understand both their legal powers and safeguarding duties. This requires structured induction, regular opportunities for practice, and refresher training.

- 6.130 Discussions with leaders and staff showed that some training covering behaviour is in place, but it is uneven and largely front-loaded. The Principal described an extensive programme that includes induction days, “bite-size sessions,” and *Thursday CPD*, with an emphasis on experiential approaches such as role-playing lineups. While this can be effective, behaviour training appears not to be recorded or resourced in a way that allows for review, auditing, or consistency. Materials are scattered across individual staff drives, rather than collated into a centralised, quality-assured curriculum.
- 6.131 The Vice Principal highlighted responsive “bite-size” sessions, for example on “*what makes an effective detention*.” He suggested that, because behaviour is already outstanding, training receives less focus compared to other areas. Another senior leader recalled role-play activities around lineups and “*difficult conversations*” but little beyond induction. This indicates there is no sustained, mandatory programme on the ethical implementation of the policy. The CEO also referred to role-play but did not provide evidence of ongoing training. His focus in my interview was on defending the policy itself rather than explaining how staff are equipped to use it appropriately.
- 6.132 Teacher perspectives reinforced this picture. Several described induction as useful but felt it was not followed up with ongoing development. One teacher explained: “*After induction, we don’t really revisit behaviour training—it’s mostly assumed we know it.*” Another noted that the experiential role-play was engaging, “*but once you’re in the classroom, you realise situations are never that simple, and there isn’t really training to help with that.*” This suggests staff value initial training but want reinforcement and reflection once they encounter real scenarios.
- 6.133 Teachers also highlighted a lack of practical guidance in sensitive areas. “*We’re told to be consistent, but no one has ever shown us how to de-escalate a situation instead of sanctioning,*” said one member of staff. Others expressed concern about the absence of training on SEND and vulnerable pupils: “*I worry that we don’t always adapt enough for children with additional needs—we’re not trained in what flexibility should look like.*” These comments echo the DfE’s expectations around trauma-informed, anti-discriminatory and anti-racist practices, and SEND adaptation, which currently seem underdeveloped.
- 6.134 Some teachers pointed out inconsistencies created by unclear training. One remarked: “*One teacher gives a sanction for looking at the clock, another doesn’t. We’re told there are no grey areas, but in reality, there are loads—and that’s where people get confused.*” Others reflected that the emphasis on monitoring sanction numbers adds

pressure: *“It feels like you’re judged by how many sanctions you give, not whether you handled the situation well.”* These experiences illustrate how training gaps contribute to inconsistency and staff morale issues.

- 6.135 The training materials I reviewed reinforced this compliance-driven emphasis. Slides stress the rules, but give less attention to the rationale behind them. Staff who feel they are sanctioning “silly” behaviours may lack a shared understanding of intended outcomes. Furthermore, while one slide I saw outlined the support available to pupils, there limited reference to this. One slide set submitted to me, produced in 2022 (on pupil wellbeing) carefully pointed to the critical role teachers play in identifying the early signs of emotional stress in a pupil and the services available for them.
- 6.136 Despite these concerns, staff value certain aspects of training. Teachers generally welcomed opportunities for experiential learning and acknowledged that induction was thorough. As one commented: *“The role-plays at the start really helped me understand what was expected.”* The challenge is that this positive foundation is not sustained over time. Without a structured, ongoing programme, confidence fades and practice becomes inconsistent.
- 6.137 These gaps have practical implications. Governors and staff noted inconsistency in implementation, and several teachers raised concerns about how the policy meets the needs of more vulnerable pupils. Without explicit SEND-related or trauma-informed training, the risk is that these pupils are not consistently supported.
- 6.138 This represents not only a training issue, but a leadership and governance challenge. The DfE and Ofsted expect schools to have a recognisable *“behaviour curriculum,”* taught explicitly and systematically, just as with any subject. At present, staff are given a powerful tool but not always the structured preparation to apply it consistently, fairly, and ethically.
- 6.139 Moving forward, improvements need not involve changing the policy itself but strengthening the support around it. Leaders could usefully:
- Develop a centralised, quality-assured behaviour curriculum with clear learning outcomes.
  - Record and resource all training so staff can revisit it and so content can be quality-assured.

- Ensure mandatory coverage of de-escalation, trauma-informed, anti-discriminatory and anti-racist practices and SEND adaptations.
- Create space for reflective discussion, enabling staff to share dilemmas and learn from real scenarios.
- Rebalance emphasis so training not only enforces rules but also builds understanding of their purpose.

6.140 Such steps would align practice more closely with DfE guidance, strengthen consistency across the school, and give all staff the confidence and professional judgment needed to implement the policy fairly and effectively for all pupils. As one teacher put it: *"We all want the policy to work, but we need the right tools to make it work for every child."*

6.141 *Appendix 6* outlines training for a behaviour curriculum in more detail.

## **Leadership, Accountability and Governance**

6.142 The immediate and uncompromising reaction of senior leaders in the Federation and MVPA was to challenge the CSPR's very justification - publicly dismissing the widespread concerns without pausing to listen, reflect and learn.

6.143 To me, this signals hubris. Their unwillingness to acknowledge potential fault, combined with an attitude that practice is inherently sound because pupils achieve good results, is the Federation's biggest risk. The lack of data analysis, the absence of scrutiny and the failure to be curious are not, in my view, unconnected. All have the potential to question the Federation's *Unique Selling Point* - its approach to strict behaviour - and yet, by not doing these things, such questions are never asked. Leaders remain insulated and accountability is hindered.

6.144 This suggests a leadership culture that is stifling transparency, reflection, and the listening required for genuine learning and improvement. It suggests a leadership that is placing the Federation's reputation above all else.

6.145 Furthermore, despite senior leaders espousing the notion of "rigidity with flexibility", the Federation's value of 'No Excuses' is ultimately being delivered as "zero tolerance". Testimonies from current and ex-teachers speak of top-down pressure fostering a harmful culture, with senior leaders framing *"empathy as a weakness"*, sanction-tracking staff and actively cultivating a *"climate of fear"* through methods taught in

training. Evidence has also been shared demonstrating how maintaining the approach to strict behaviour has trumped the advice of external professionals.

- 6.146 This leadership culture is also reflected through their personal engagement in some of the most criticised practices. For example, one leader admitted that shouting was used as a deliberate public performance to deter misbehaviour. This humiliation of pupils is consistent with multiple accounts shared with the review. I find it highly unlikely that such practice will be isolated to one leader. It is equally unlikely to be practice that is unknown by more senior leaders - particularly given the evidence that shouting has been a routine topic of debate within the Federation.
- 6.147 In summary, the adamant defence by senior school leaders of their methods, bolstered by a perceived untouchability due to academic results, has allowed harmful and disproportionate practices to persist unscrutinised and unchecked.
- 6.148 For governors, the DfE's guidance regarding the responsibilities of academy governors outlines the statutory and non-statutory expectations for oversight, monitoring, and compliance as it relates to pupil behaviour. In terms of legal requirements, under Section 88 of the Education and Inspections Act 2006, governing bodies of academies must set and regularly review a written statement of behaviour principles. This statement serves as the framework within which a headteacher sets a detailed behaviour policy. In this context, Academy governors should:
- Develop and review an up-to-date, clear behaviour policy, ensuring it is published and understood by staff, pupils, and parents. It should clearly articulate the school's values and expectations on behaviour and discipline.
  - Ensure the statement promotes fairness, inclusion, respect, and proportionality in behaviour management.
  - Review the statement regularly and consult with stakeholders (e.g., parents, staff, and pupils).
  - Publish the statement so that it is accessible to the school community.
  - Ensure the statement supports consistency, ensures legal compliance (e.g., safeguarding, Equality Act 2010, Keeping Children Safe in Education 2024), and reflects the academy's commitment to providing a safe and supportive learning environment.
  - Set and regularly review a statement of behaviour principles (required by the Education and Inspections Act 2006). Generally, this statement is reviewed and approved by the full governing body, typically annually.

- Ensure consistent, proportionate implementation of the policy, with appropriate training on behaviour management for staff.
- Monitor and review data on suspensions, exclusions, classroom removals, and assess trends and the policy's impact on different pupil groups (e.g. ethnicity, gender, SEND/Pupil Premium).
- Ensure the policy is inclusive, making reasonable adjustments for pupils with SEND.

6.149 Drawing upon this legislation and guidance to structure my interviews, I focused on the themes of accountability and governance with the governors, trustees, and members. I also systematically analysed the agendas and minutes from all meetings of the CFB, its Risks and Controls Committee, and the LGB over the past three years. Where necessary, I requested additional supporting material, such as data analysis on sanctions and an external review of behaviour commissioned by the LGB in 2019.

6.150 While the Risks and Controls Committee functions well and exercises a strong degree of safeguarding oversight across the Federation's schools, across all three forums, there was little evidence of effective scrutiny, challenge, or evaluation of behaviour policy and practice. Indeed, although governors have been involved in suggesting minor amendments to policy and considering reports on suspensions and exclusions, they do not appear to have examined the impact of the school's 23 other disciplinary sanctions.

6.151 References to behaviour in board minutes are infrequent, there is no record of it being a regular agenda item (beyond suspensions and permanent exclusions), nor evidence of any rigorous questioning. Moreover, several governors I spoke with stated they do not receive the sufficiently detailed information required for effective scrutiny. This lack of access to key data significantly compromises their ability to assess the policy's true impact and hold the leadership team accountable. This is likely resulting in a failure to meet a core DfE expectation as it relates to governance.

6.152 That said, one governor did offer a contrasting view, claiming that data was readily available. They described it as being presented on-screen, allowing for a discussion during meetings. They also suggested this information was likely omitted from the minutes due to clerical staffing difficulties. Two senior staff members corroborated this, stating the data was available to the board.

- 6.153 However, I saw no evidence of this and I am not persuaded that the administrative issues with the minutes have been an obstacle. Indeed, minutes were produced. Furthermore, when asked for reports that could evidence the oversight of the CFB, LGB or any other committee, none were provided to me. Instead, I was given a narrative that explained how data *“is viewed live in the system and is used by staff to answer the question they might have.”* I was further told that the Federation *“does not want to wait to write formal reports before acting.”* In summary, whilst data on behaviour and sanctions might be available within MVPA’s system, there appears to be no systematic mechanism through which senior leaders or governing bodies are scrutinising it.
- 6.154 The testimony of one senior leader also revealed a passive relationship between the leadership and the governing body. When asked how they assist governors in fulfilling their duty to assess the effectiveness of the behaviour programme, the response was: *“I don’t feel it’s for me to comment on how my bosses go about fulfilling their statutory responsibilities.”* This statement suggests that leaders do not see it as their role to proactively ensure robust governance, preferring merely to provide information and expect governors to know which questions to ask. Furthermore, the leader admitted that governor reports *“don’t always go into each of the sanctions,”* strongly indicating that many behavioural interventions have likely never been scrutinised.
- 6.155 Both the CFB and LGB also need to consider the sufficiency of the school’s IT system (in terms of capturing complex behaviour data) and whether there is the technical competence to interrogate it. Whilst the Federation expressed it had *“zero concerns with the data it holds”*, evidence from my review has raised doubts about both aspects. A critical factor in this determination was the Federation’s inability to swiftly provide the review with analysable, disaggregated data on its use of sanctions.
- 6.156 Overall, the evidence of this review points towards governors having accepted high-level summary reports, without asking for the underlying evidence that would potentially reveal systemic issues. This on its own highlights a failure of governance, which is likely compounded by inadequate systems.
- 6.157 Good governance requires a board to set the strategic tone and challenge the executive, rather than simply acting as a passive recipient of information. The LGB has not held its own leadership accountable, and the CFB has not fulfilled its overarching duty to ensure effective governance at the academy level.

- 6.158 Problems such as parental complaints and media attention were known yet not scrutinised. Some leadership attitudes towards them were ones of deflection, scepticism and dismissal, attributed to "*murmurings of some discontent*" driven by "*jealousy*". This invalidates parental feedback, creating a significant barrier to effective governance. The DfE mandates an accessible and responsive complaints system, not one that is pre-judged and dismissed.
- 6.159 Based on my analysis of the evidence, governance and accountability arrangements have been ineffective as they relate to the focus on behaviour. None of the governing bodies or Committees have provided MVPA's leadership team with the necessary level of analytical challenge I would have expected to see. The weaknesses in this context are amplified when considering the importance placed on pupil behaviour by the Federation as a whole.
- 6.160 Governors seem to be reactive, insufficiently informed, and prone to dismissing critical concerns. Indeed, some stated that they can "*only deal with something that's put in front of you*" and "*we don't know what we don't know*". This suggests that if senior school leaders do not present an issue, it will not be addressed by the board.
- 6.161 Another said that governors do not receive detailed, information. Discussions about behaviour are often "*in the ether rather than a specific factualised data point*". This prevents the meaningful scrutiny required by the DfE and allows for a significant disconnect between policy and practice. A lack of awareness of key school practices is also a concern; for instance, a senior governor admitted they were "*not the right person to ask*" about the policy of placing children on desks and that they "*did not really understand it*." This is a lapse in duty. Without such understanding, governors will be unable to provide effective oversight and therefore cannot guarantee the proper management of these sanctions.
- 6.162 While there are instances of adherence to DfE guidance, such as acknowledging flaws and amending the complaints policy, these efforts are insufficient to overcome the wider failures in oversight, scrutiny, and accountability as they relate to the behaviour policy. Whilst noting an 'external review' of behaviour was commissioned in 2019 by the LGB, the reported action plan that might have demonstrated its impact at MVPA was not readily available or retrievable for me to examine.
- 6.163 Overall, governors have approved policies and received reports without applying sufficient challenge and they have failed to ask the right questions, demand the right

data, or investigate clear concerns. Has this allowed a culture of defensiveness and an attitude of 'ends-justify-the-means' to go unchecked? The governance arrangements seem not to have provided a meaningful check on the power of the Executive leadership in relation to the implementation of the behaviour policy. The evidence I have collated for my review suggests they have been lulled into inaction by strong academic results. They have confused excellent outcomes with excellent practice, failing to ask the question, as one teacher told me, "*At what cost to some pupils are these results achieved?*"

## **MVPA's Response to Complaints**

- 6.164 The accounts submitted by parents and carers detail deeply frustrating and often damaging experiences when engaging with MVPA's complaints procedure. These revolve around several key issues.
- 6.165 Firstly, there are concerns that complaints are being dismissed and ignored. Parents report that serious issues, such as bullying, excessive punishments, and discriminatory practice, have been routinely disregarded by the school's leadership. Significantly, a local charity stated that absolutely no complaint they had supported against MVPA had ever been upheld.
- 6.166 Secondly, the procedure is said to be characterised by poor communication and unresponsiveness. Many attempts by parents and carers to communicate via email, phone, or letter received no meaningful response, which left individuals feeling unheard and helpless. This reported lack of transparency and communication is likely feeding into the very real or perceived notion that complaints are not taken seriously and are dismissed disproportionately.
- 6.167 Thirdly, there were reports about a culture of coercion and intimidation. Parents described feeling "*harassed and bullied*" by the school. Reports include a member of staff allegedly using coercive behaviour to obtain admissions from pupils, and another staff member said to have gestured disrespectfully by waving their hand in a parent's face during a discussion. The severity of this is underscored by the fact that one parent reported being banned from the school premises after complaining.
- 6.168 Finally, there are concerns that MVPA is prioritising the protection of its policies over the well-being of its students. This interpretation stems from some parents feeling they need to present a united front in line with the school's stated position. Consequently,

some feel this actively conflicts with and inhibits their ability to successfully advocate for their child's welfare and raise issues of concern.

6.169 An examination of the accounts submitted to the review revealed a clear hierarchy in the methods used by parents / carers when attempting to formally raise their concerns. Of the 73 accounts relating to MVPA, 40 confirmed a Stage 1 complaint had been made to the school. Seven were said to have reached governor level. From what is known about MVPA's recording system, none of the Stage 1 complaints will have been centrally recorded. As such, the specific themes, patterns and trends arising from these complaints are unlikely to have ever been scrutinised.

6.170 Notably, 11 of the accounts stated that no attempt had been made to raise their concerns with MVPA. Several recorded they pursued another unspecified route, and others were escalated to Hackney Council, Ofsted, the DfE and external advocacy organisations.

6.171 For those saying they had complained to MVPA, an analysis of their accounts revealed the most common concerns being expressed. These were the impact on mental health and issues related to the child being unable to voice concerns, both cited in 37 of the 40 cases respectively. Closely following were intimidation, humiliation, degradation or fear, reported 36 times, and difficulties in communication with parents, carers and other agencies, which was reported 35 times. These themes are overwhelmingly centred on the psychological and relational damage reportedly caused to pupils and the breakdown of communication with the family.

6.172 Disciplinary actions and staff behaviour also feature prominently:

- Detentions were a primary factor in 34 of the accounts.
- Shouting at students was reported 30 times, matching the count for Communication.
- Issues regarding the school's response to mental health issues were cited 27 times.
- Other sanctions issued to pupils were raised in 27 instances.
- Pressure to admit to something untrue was reported 23 times.
- The impact on children with SEND, neurodiversity or similar was cited 24 times, and the response to medical guidance was cited 21 times.

6.173 MVPA provided data held on 22 formal complaints it had recorded between January 2022 and January 2025. The headlines show that that 12 were not upheld, seven were

partially upheld and three were upheld. The evidence on these complaint outcomes, particularly the proportion of serious allegations that were not upheld, combined with the concerns over MVPA's lack of communication, provides some weight towards the concerns expressed by parents/carers. This inevitably reinforces the perception among parents and carers that their complaints are being disproportionately dismissed.

- 6.174 These dismissed allegations included serious issues such as racism and adultification, bullying, unlawful exclusion and disproportionate sanctions, the alleged misuse of the BSU, and alleged misapplication of a detention. Also dismissed were allegations concerning the inappropriate actions of adults, such as allegedly denying a student a drink of water or refusing to open a window when a pupil was unwell.
- 6.175 Where complaints were upheld or partially upheld, it was almost exclusively due to procedural or administrative failings. Two of the three upheld complaints specifically concerned communication. Of the seven partially upheld complaints, three cited the "*communication aspect*" being upheld while simultaneously dismissing the core allegations (i.e., racism, bullying, and inappropriate use of the behaviour policy). A further partially upheld complaint related to delays in the complaints process, and another was specifically about communication.
- 6.176 About whom the complaints were focused is also relevant to consider. These often involved a member of the Senior Leadership Team or a Head of Year. Combined with the low number of complaints being upheld, this has raised questions for some about whether the process is designed to protect senior figures and the disciplinary framework they implement, rather than holding them to account.
- 6.177 While acknowledging that the Federation commissioned Anne Whyte KC to undertake a specific review of the complaints process across all its schools, the evidence indicates that the arrangements at MVPA lack the full confidence and support of the very people they are designed for. It is worth noting that the Chair of the Federation and a Member both identify the complaints procedure as a major failure. The latter describing the existing policy as "*awful*," "*bureaucratic*," and "*inaccessible*," particularly for what was described as "*non-middle-class parents*".
- 6.178 Those aggrieved with how MVPA has managed their complaints see the process as a defensive shield, actively dismissing concerns, intimidating parents, and protecting a rigid disciplinary culture that prioritises control over student well-being.

- 6.179 Significant benefits are likely be accrued if MVPA's complaints system is redesigned to include much more independence and impartiality. Such arrangements would have the effect of instilling greater confidence amongst parents and carers and provide a greater degree of reassurance to governors about the integrity and objectivity of the process.

### **The Management of Allegations against Staff and Volunteers**

- 6.180 In determining the sufficiency of MVPA's arrangements for the management of allegations against staff and volunteers, alongside reviewing relevant written material, I interviewed Hackney Council's Local Authority Designated Officer (LADO). The LADO's core functions are to ensure that all concerns are dealt with fairly, quickly, and consistently, balancing the protection of the child's welfare with fairness towards the person who is the subject of the allegation. LADOs do not undertake investigations themselves, and their work is undertaken in line with the statutory guidance, WT23, and the London Safeguarding Children procedures.
- 6.181 The LADO reported a generally good professional relationship with the school, characterising the Principal as responsive and diligent whenever they have been engaged. Furthermore, they confirmed that in their view, MVPA's safeguarding processes reflect good practice, and its written documentation is, to a large extent, a model for other schools.
- 6.182 Regarding activity in this area, the Principal's safeguarding reports to MVPA's LGB indicated that 13 'allegations against staff' were made in the three years leading up to the end of 2024. However, the LADO's data showed seven referrals over the past five years. While noting this inconsistency, it was confirmed that no case had met the threshold for further LADO action. This meant that for all considered cases, MVPA was deemed responsible for investigating and acting on any concerns through internal conduct or disciplinary measures.
- 6.183 As part of the evidence provided for the review, MVPA clarified that the following arrangements were in place: *The data in relation to allegations against staff is held in the confidential personnel files of individuals and is scrutinised accordingly. For example, the case manager (in consultation with the LADO if they have been involved) considers the facts and determines whether any lessons can be learned and if improvements can be made.*

- 6.184 While this sets out a clear process, no additional information was provided to demonstrate how any wider scrutiny was being undertaken. Indeed, apart from the Principal's report, there is no evidence to show that governors are being kept routinely sighted on potential issues of concern or what lessons have been identified and practically applied from known cases. This is particularly significant given that many of the concerns that have been raised to the LADO mirror those currently being highlighted as part of this review.
- 6.185 MVPA also confirmed that it retains data on low-level concerns (those that do not meet the threshold for a LADO referral or action) in line with both statutory guidance and the Federation's own policies. These records reportedly include the specifics of the concern, the context in which it arose, and the action taken.
- 6.186 I was advised that the Principal reviews these records each time a new low-level concern is raised. This process is intended to identify any potential patterns of inappropriate individual behaviour or wider cultural issues. Since September 2021, MVPA has recorded 16 such low-level concerns. Two of these were specifically reported by MVPA as relating to staff shouting or raising their voices.
- 6.187 I found no evidence of low-level concerns featuring within the minutes or reports presented to the CFB or LGB. In its absence, governors remain unsighted on the outcomes of these concerns, any patterns of concern and what action, if any, has been taken by MVPA's leadership on individual cases.
- 6.188 A critical element concerning the sufficiency of MVPA's arrangements centres on a specific allegation made against a very senior school leader in the Federation. Although the initial referral to the LADO was correctly handled (and resulted in a determination that no further LADO intervention was required), the decision regarding the subsequent internal investigation was highly questionable.
- 6.189 It is understood that the task of investigating the incident was assigned to a Designated Safeguarding Lead (DSL) working in one of the Federation's schools. While there is no reason to doubt the professional competence or integrity of the DSL, this appointment unquestionably presented a conflict of interest.
- 6.190 I am surprised that those within the Federation responsible for commissioning the investigation did not recognise this. If they did, their decision to proceed and permit a junior member of staff to investigate one of the most senior figures in the Federation is

incomprehensible. This arrangement created the strong, and arguably inescapable, perception that the investigation's independence was compromised from the outset, potentially intending to shield the senior leader from genuinely impartial scrutiny.

## 7. Conclusion

### The Paradox Explained

- 7.1 This review has examined a school that simultaneously achieves remarkable academic success whilst causing harm to some of its most vulnerable pupils. MVPA's achievements are real - examination results are outstanding, attendance exceeds national averages, and many pupils thrive. These successes deserve recognition. However, there is substantiated evidence that for a significant minority of pupils, particularly those with SEND, mental health challenges, or who struggle to conform to an inflexible system, the school's approach to discipline has been harmful.

### What This Review Has Found

- 7.2 Through triangulating evidence from the submitted accounts, interviews, survey results, data, and extensive documentation, the review has identified systemic problems:
- **Harmful Practices:** Shouting is used routinely to humiliate pupils; "desking" is isolating and unmonitored; the behaviour policy fails to make reasonable adjustments for SEND pupils, punishing disability-related behaviours; the school environment contributes to mental health difficulties; the BSU and APC function as containment rather than rehabilitation.
  - **Cultural Problems:** A "healthy fear" model prioritises control over wellbeing; defensive leadership dismisses concerns as vexatious; the complaints process is seen to act as a defensive shield; parental engagement is reduced to compliance; staff fear raising concerns.
  - **Governance Shortcomings:** Governors have been lulled by strong academic results; essential data on sanctions and disproportionate impact has not been demanded; oversight has confused excellent outcomes with excellent practice for every child.

### The Cost of Success

- 7.3 MVPA has created a system optimised for pupils who can navigate its strictures but has failed to build in the flexibility and compassion required to protect those who

cannot. Former pupils describe lasting trauma and damaged self-worth. Parents report children needing therapy, developing school refusal, or leaving education. Professionals consistently raise concerns about inflexibility and mental health impact.

- 7.4 The question is fundamental: At what cost has success been achieved? Academic excellence that traumatises some pupils is not true excellence. Discipline through fear is not preparing young people for life as confident, independent adults.

### **Why has this happened**

- 7.5 Leadership has come to believe harsh discipline is not just a means but the defining characteristic of success - the method has become the mission. Rather than responding with curiosity, leadership dismisses concerns as vexatious or ideologically motivated. Practices like shouting have become so routine they are no longer recognised as harmful. Governors have not asked: Success for whom? At what cost?
- 7.6 Every child attending MVPA is entitled to an education that protects their dignity, wellbeing, and development. The Equality Act 2010 requires reasonable adjustments. The statutory definition of safeguarding includes emotional wellbeing. Article 3 of the European Convention on Human Rights prohibits degrading treatment. For some pupils, MVPA has failed to meet these standards.
- 7.7 School leaders cannot claim ignorance. Concerns have been raised repeatedly by parents, professionals, staff, and in the 2016 Ofsted inspection, which noted high exclusions, BSU concerns, lack of nurturing culture, and pupils' reluctance to share concerns. These issues were obscured by rising examination results rather than addressed.

### **What Must Change**

- 7.8 MVPA must move from compliance-through-fear to engagement-through-respect. This requires:
- **Cultural Transformation:** Abandoning "*No Excuses*" and replacing it with high expectations combined with genuine care, flexibility, and individualisation. Staff must exercise professional judgment and prioritise relationships alongside rules.
  - **Leadership Accountability:** Senior leaders must acknowledge their defensive posture has prevented change. Dismissing concerns as vexatious was wrong and must end. Leadership must model openness to criticism and commitment to every child's wellbeing.

- **Governance Reform:** Governors must shift from passive recipients of reassuring reports to active interrogators. They must demand data disaggregated by protected characteristics, scrutinise this for disproportionality and through an anti-racist lens, and understand that academic success without wellbeing undermines the Federation's mission.
- **Systemic Safeguards:** Implement mandatory reasonable adjustments for SEND pupils, independent complaints mechanisms, regular external audits, comprehensive data collection, and genuine pupil and parent voice.
- **Transparency:** Every sanction must be recorded, monitored for disproportionality, and analysed for effectiveness. Without transparency, there can be no accountability.

### **The Choice**

- 7.9 The Federation faces a choice: respond defensively, dismissing the findings of the CSPR and making cosmetic changes while preserving the fundamental culture, or respond with courage - acknowledging harm and implementing transformative change. The first path leads to continued harm and eventual regulatory intervention. The second leads to a school maintaining academic excellence while building compassion, flexibility, and genuine inclusion.

### **The Standard**

- 7.10 A school's true measure of success is how it treats its most vulnerable pupils - those with disabilities, struggling with mental health, who find conformity difficult, whose families lack social capital to advocate. Good intentions do not excuse harmful practices. The evidence of this review demonstrates that for some pupils, harsh treatment has not led to better outcomes but to trauma, school refusal, and psychological harm. These pupils have been damaged, not strengthened.

### **Recommendations**

- 7.11 This review's recommendations are requirements for fundamental change, not suggestions for incremental improvement. Members must hold the CFB and school leaders accountable for implementing recommendations swiftly, genuinely, and completely. Implementation must be monitored through independent external oversight. Progress must be measured through data on sanctions, pupil wellbeing, parental confidence, and staff psychological safety.

- 7.12 Some recommendations require resources such as specialist staff, data systems, and independent oversight. These investments are necessary costs of meeting the Federation's safeguarding obligations.

### **Broader Implications**

- 7.13 While focused on MVPA, concerns extend across the Federation. Members must ensure all Mossbourne schools are examined against these findings. This review also has national implications. The "No Excuses" model, when implemented rigidly without adequate safeguards, can become one of 'zero tolerance' that causes serious harm to vulnerable pupils.

### **Hope for the Future**

- 7.14 Despite these findings, there is reason and optimism for change. MVPA has many dedicated and caring teachers who are deeply committed to pupils. The school has demonstrated its ability to achieve remarkable results for disadvantaged pupils. Most parents and pupils value the school and want it to succeed. They are asking for rigour combined with humanity - excellence without harm. This is achievable through effective leadership, positive relationships, trauma-informed practice, restorative approaches, and genuine inclusion.
- 7.15 Education's purpose is not simply achieving high examination results, but developing confident, resilient, compassionate young people prepared for life. MVPA has demonstrated its capacity to transform life chances through academic achievement. It must now transform its own culture to build a school where every child can thrive.
- 7.16 This review has provided the evidence, analysis, and recommendations needed. The responsibility now rests with the Members, governors, and leaders of the Mossbourne Federation. The pupils who have been harmed, and those who might be harmed in the future, deserve nothing less than complete commitment to change.
- 7.17 The question is not whether MVPA can achieve academic excellence—it already has. The question is whether it can achieve that excellence while protecting the dignity, wellbeing, and development of every child in its care. That is the standard against which it must now be judged.

## 8. Recommendations

- 8.1 As the ultimate guardians of the Federation's governance, the Members retain a critical oversight function distinct from the day-to-day responsibilities of the trustees within the CFB and the school-level LGBs. In line with their Terms of Reference, the Members have reserve powers to intervene in exceptional circumstances and call for a review or initiate other action should evidence arise that the Federation is not upholding its founding vision and values.
- 8.2 The Members should hold the CFB accountable for the timely acceptance and implementation of these recommendations. It is the CFB's responsibility to ensure the CEO and MVPA's school leaders drive these actions forward. Given that concerns were raised across the Federation, the Members should further hold the CFB accountable for the consideration and application of these recommendations across all its schools.

### Recommendations for Members of the Federation

- 8.3 **Recommendation 1: Leadership, Accountability and Governance** - The Members should require the CFB to develop a defined action plan in response to the review's recommendations. Members should also set up a defined process that allows them to oversee progress against this plan and hold the CFB accountable for its implementation.
- 8.4 **Recommendation 2: Leadership, Accountability and Governance** – The Members should facilitate refreshed skills audits for both the CFB and MVPA's LGB. They should also commission external support to help assess and improve the functioning of both boards in respect of their core operations and crucially, how oversight, scrutiny and challenge can be discharged more effectively.
- 8.5 **Recommendation 3: Governor Monitoring and Oversight** - The CFB should implement a robust framework to monitor the application of the Federation's behaviour policy. This should involve regular reporting to the CFB and MVPA's LGB with disaggregated data on all sanction types. Data should be comprehensively analysed in the context of pupil characteristics and protected characteristics. Disproportionality, anti-racism and the correlation between sanctions and outcomes (such as attainment, attendance and wellbeing) should also be factored into any analysis. To improve transparency, suitably anonymised data should be published.

8.6 **Recommendation 4: Removal from Classrooms / Desking** – The CFB should directly engage the Department for Education (DfE) about the appropriateness of "desking" and whether this sanction, as currently practiced, complies with DfE requirements for pupil dignity and continued education. If such practice continues as a permissible sanction, then MVPA should amend its processes to ensure there is the proper and accurate recording of it.

8.7 **Recommendation 5: Stakeholder Consultation on Behaviour Policy** - The CFB should launch a detailed consultation on the contents of the Federation's behaviour policy. This should engage pupils, parents, staff, multi-agency partners and external experts. The Members should agree the full contents of this consultation, with the following areas being included for testing:

- Whether a "No Excuses" ethos remains compatible with inclusion and dignity.
- How to best reflect the DfE's expectations on proportionality, dignity and reasonable adjustments.
- How the advice of external experts is sought and responded to.
- How 'flexibility' can be better reflected in practice, what this might look like and whether mandatory expectations should be introduced to ensure consistency.

8.8 **Recommendation 6: A Behaviour Curriculum** – The CFB should design and implement a comprehensive behaviour curriculum for all MVPA staff that aligns with DfE expectations. It should include:

- Comprehensive induction that includes positive behaviour management, child development and trauma impact
- Ongoing termly sessions that focus on specific topics such as SEND, neurodiversity, mental health, de-escalation, trauma-informed and restorative practices.
- Annual refresher training that covers behaviour policy changes, what the data is showing, case studies and reflective practice.
- Specialist training for BSU/APC staff, SENCOs and the pastoral team.
- Leadership training that includes areas such as modelling expectations, non-defensive complaint handling, developing parent partnerships and capturing pupil voice.

8.9 **Recommendation 7: The Behaviour Support Unit** - The arrangements in MVPA's BSU should be improved by:

- Ensuring a qualified behaviour specialist supports pupils in the BSU as opposed to rotating members of SLT covering this function.
- Mandating a maximum two consecutive days for pupils placed in the BSU, unless a detailed specialist support plan has agreed this and is in place.
- Requiring all pupils placed in the BSU to have an individualised support plan. The BSU should not be used for generic isolation.
- Holding restorative conversations with all pupils in the BSU before they return to class.

8.10 **Recommendation 8: Alternative Provision Centre** - The arrangements in MVPA's APC should be improved by implementing the following:

- Increasing the provision of specialist SEND educators.
- Reviewing and clarifying therapeutic approaches to support pupils with the CAMHS partnership.
- Ensuring that pupils have clear reintegration pathways defined for them with a graduated return.
- Ensuring there is academic curriculum parity and not a diminished offer for pupils in the APC.
- Measuring success with a focus on sustained mainstream return, not just non-exclusion.

8.11 **Recommendation 9: Pupil Retention and Monitoring** – The CFB should implement a regular review of Year 7–11 pupil retention data at MVPA. This will help identify and understand the factors contributing to MVPA's higher retention loss rate compared with national figures and support the development of appropriate responses. The review should also consider the reasons pupils leave the school roll, including those moving into elective home education (EHE), so that any potential risks associated with “off rolling” can be properly monitored and addressed.

8.12 **Recommendation 10: Independent Review of Pupil Mental Health** – The CFB should commission an independent review of the high numbers of pupil mental health concerns identified at MVPA. The Members should approve the terms of reference for this review, ensuring they account for any potential exacerbating factors related to the application of the behaviour policy.

- 8.13 **Recommendation 11: The Code of Conduct** - The Federation's Code of Conduct should be revised to explicitly prohibit shouting at individual pupils as a disciplinary measure. The Code should define acceptable voice raising (gaining attention of groups) and unacceptable shouting (individual humiliation). It should also prohibit the use of any public reprimand, action, or sanction that has a primary function to draw negative attention to a pupil for the purpose of shaming them. The Code should make clear the disciplinary consequences for staff who shout inappropriately.
- 8.14 **Recommendation 12: Workforce** – The CFB should implement robust mechanisms to support and protect staff who raise concerns regarding the implementation or efficacy of the behaviour policy, ensuring no fear of retribution.
- 8.15 **Recommendation 13: Strengthening of Complaints Process** - The Federation's complaints process should be revised and improved to strengthen its focus on independence, communication and evaluation. The CFB should:
- Implement an auditable system to record all Stage 1 complaints.
  - Ensure families are signposted to local independent advocacy groups as part of the complaints process.
  - Require MVPA's LGB to evaluate complaints data on a termly basis.
  - Ensure an aggregated evaluation of complaints data is considered by the CFB on a termly basis.
  - Publish anonymised complaints data on an annual basis, alongside any analysis of the data, the lessons learned and any changes that have been made to policy and practice.
- 8.16 **Recommendation 14: Conduct / Disciplinary Investigations** - The Federation should review and strengthen the arrangements for internal conduct and disciplinary investigations. These arrangements should ensure the objectivity and integrity of the investigative process, avoid conflicts of interest, and specify the use of an independent external investigator when complaints or concerns involve the CEO, Principals and members of a school's SLT.
- 8.17 **Recommendation 15: Review of Concerns and Allegations against Staff** - The CFB should strengthen its arrangements for reviewing data concerning allegations and low-level concerns against staff. The Members should ensure that the CFB and MVPA's LGB routinely review data, themes, patterns, trends, and outcomes in this area.

## Recommendation for the Local Authority and MVPA

8.18 **Recommendation 16: SEND/EHCP Provision** - The local authority should undertake a randomised audit of a large sample of Education, Health and Care Plans (EHCP) at MVPA to examine:

- Whether Section F provisions are being delivered effectively for pupils.
- The application of sanctions towards EHCP pupils.
- Whether MVPA is making sufficient reasonable adjustments in the application of the behaviour policy.
- Pupil and parent satisfaction with EHCP implementation at MVPA.

8.19 **Recommendation 17:** All MVPA staff involved in making referrals to Hackney's Multi-Agency Safeguarding Hub should attend a bespoke training session (to be designed and delivered by staff in the MASH) covering the Hackney Child Wellbeing Framework, the functions of the MASH, how and when to contact the MASH consultation line and the expected practice surrounding the seeking of consent prior to making a referral.