

# The Mossbourne Review

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An Independent Review commissioned by the Mossbourne Members' Trust into the way in which complaints processes and safeguarding procedures have been operating within the Mossbourne Academy Schools

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# Executive Summary

## Background

1. In 2024 concerns were reported in the press about the wellbeing of students within Mossbourne academy schools in Hackney, in particular, at Mossbourne Victoria Park Academy. In numerous cases the parent or carer in question had chosen not to raise their grievance with the school or to use the Mossbourne Federation's Complaints Policy. These concerns were coordinated and publicised by a parent who had been in an unresolved disagreement with Mossbourne Victoria Park Academy about the arrangements in place for his child. They were sent to Hackney Council in an anonymised summary and reports about them featured in the local and national press. The focus of the concerns was on the attitude of staff towards pupils and on the Pupil Behaviour Policy. It was suggested that the strict application of this policy was having an adverse impact upon the welfare of pupils, especially those pupils requiring extra curriculum support due to learning difficulties or other health conditions. These matters are now being investigated by the City & Hackney Safeguarding Children Partnership in the form of a local statutory safeguarding review.
2. The Mossbourne Members' Trust sits above the Mossbourne Central Federation Board, which runs four schools in Hackney (see organigram at Appendix E). The Trust formed a ring-fenced sub-committee. This sub-committee appointed me, in an independent capacity, to examine and report upon Mossbourne policies about safeguarding and complaints and how they were operating in Hackney. The Department for Education had recommended this course of action. The Trust agreed that this work was urgent because it was clear that some parents were not using the available policies to express their concerns. I was asked to identify future actions that might optimise parental and carer confidence in the operation of those policies and in the ability to raise concerns. The schools in question are two primary schools, Mossbourne Riverside and Parkside and two secondary schools, Mossbourne Victoria Park and Mossbourne Community. Each is in Hackney.
3. My task was therefore specific and confined. I was not asked (and nor would I have been able) to decide whether any pupil had been mistreated or whether there was anything inappropriate about the application of the Pupil Behaviour Policy in individual cases. I was not confronted with any evidence that staff misunderstood their child protection or other safeguarding responsibilities or that they had failed in the performance of those responsibilities. Likewise, I found that the schools and Federation understood the public sector equality duty and incorporated the scope of that duty within their policies.<sup>1</sup>
4. I have reviewed specific policies and examined whether they comply with current statutory requirements and governmental guidance. Where relevant, I have also tried to examine the culture in the schools around complaints and behaviour to see whether that culture is impacting on parental confidence in raising concerns and complaints. Most submissions that I received were about Mossbourne Victoria Park and Community Academies and so I have concentrated my attention on those schools.
5. No-one from the Trust, Federation or schools has placed me under any pressure to reach a particular conclusion and I have been left to work independently and without any interference, answering only to the sub-committee. I am not involved in the Federation's engagement with the

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<sup>1</sup> Section 149 Equality Act 2010

City & Hackney Safeguarding Children Partnership or with the current local statutory safeguarding review.

## The Complaints and Safeguarding Policies

6. The content of the schools' policies does not represent a particular barrier to complaint, although, like any policy, they require effort to navigate. This will be more difficult for some parents and carers than others, especially where English is not the first language. My review did not, in fact, identify language barriers as a significant impediment. The Complaints Policy and Child Protection and Safeguarding Policy are fit for purpose and broadly comply with current statutory requirements. Like most policies under the spotlight, they could be refined and improved, and I have made uncontroversial recommendations about this in the hope of making them more user-friendly. For example, the process for complaining about staff conduct towards pupils lacks some clarity and could be described in plainer and more consistent language. In the secondary schools, discouraging signals to parents about using email to communicate concerns and complaints has, at times, created an unnecessary barrier. Numerous parents reported what appeared to be justifiable concerns about the lack of a prompt or meaningful response to expressions of concern or an initial complaint. This has been exacerbated by a policy which prevents parents and carers from telephoning or emailing staff directly. These are relatively straightforward issues to resolve. The Federation and schools are aware of them and are taking steps to address them. Taken together, they do not entirely explain why, on the face of it, some parents and carers with a welfare related concern have opted out of the Mossbourne complaints procedure.

## Reasons Given for Not Proceeding with a Formal Complaint

7. The parents I spoke with identified numerous reasons for not raising a concern with the school directly. Some reasons were beyond the control of the school and some would feature consistently in *any* walk of life, such as fear of a negative outcome, lack of time and energy, fear of repercussions, cultural or language barriers, fear about the quality of future relations with the person being complained about. These obstacles are understandable on a human level but if the concern is about the wellbeing of a child at school they do not really justify inactivity by the parent or carer. A failure to articulate such a concern means that the issue at stake might recur. It is naturally much better if the teacher and school know about a concern, even if they do not agree with it.
8. Some of the reasons for not complaining were more particular to the two secondary schools, such as a sense of futility, frustration at poor communications and the progress of complaints, and a fear that a pupil would be punished in some way. Some parents and carers perceived an unwillingness by staff to listen or accept fault, which was coupled with a dogmatic approach to any discussion about the school rules. Of these various reasons, the dominant factor was the last. I have identified some specific issues of culture and communications which may have contributed in an unquantifiable but real way to some parents opting out of using the Complaints Policy. I cannot reach any conclusion about those who have solely communicated their concerns to the City & Hackney Safeguarding Children Partnership or the press because they remain anonymous

to me. Whilst there may be sincerely held reasons by parents for not following the school policies, it is only right to observe that when parents or carers deliberately choose to bypass the available structures in place in this way, it puts the affected schools in a most challenging position. Anonymous complaints are easy to make but they are unsettling for staff and pupils and impossible for the schools to investigate. Allegations which deliberately circumvent the school processes inevitably distract the schools from the day job of educating and safeguarding its pupils and divert already limited financial resources away from those critical functions.

## The Side Effects of Success

### Parental Engagement

9. Most parents and carers choose to send their children to Mossbourne schools because of the highly successful outcomes that they continue to achieve for their students. There is a focus on academic excellence. The schools are strident and vocal about the application of a strict Pupil Behaviour Policy. This policy has been demonstrated to minimise disruption and anti-social conduct and to create a safe learning environment. Its importance is reinforced by the fact that parents and carers are required to sign a copy when a pupil commences school. The Mossbourne schools achieve consistently impressive results for pupils including those who require significant curriculum support and who experience serious deprivation and hardship. The schools have above national average attendance rates, low bullying levels and strive to increase social cohesion. Recent surveys suggest that there are high levels of happiness amongst the pupils, who feel safe at Mossbourne schools. The schools consciously work to improve pupil independence with a view to life after school, especially for those who require additional curriculum support. These impressive features are well publicised and were the subject of multiple positive submissions to my review.
10. The schools, notably the secondary schools, have been understandably focused on these very real and hard-won achievements and they see a direct correlation between the Pupil Behaviour Policy and those achievements. Many parents would agree.
11. I met with parents from very diverse backgrounds. They articulated in their different ways a clear sense that whilst these achievements do deserve high praise, they had come at the expense of important cultural factors such as parental engagement and positive communications. Nowhere was this more pronounced than in the context of making reasonable adjustments in the application of the Pupil Behaviour Policy. Parents wanting to engage in their children's education and to communicate with the secondary schools about their child, had the clearest sense that their views did not particularly matter to the schools. Many felt that the Federation and school leaderships believed that because parents had signed the Pupil Behaviour Policy, they had forfeited any right to express concern or dissatisfaction about its application in an individual case. Put simply, parents and some staff told me that the secondary schools were responding to an unquantifiable number of parental concerns in a dismissive fashion. Although I could not judge this on a case-by-case basis, there were sufficiently consistent submissions about it to enable me to conclude that this has started to act as a cultural barrier to parents feeling able to raise concerns.
12. Even supportive parents felt that the leadership of the Federation and the secondary schools had lost sight of the need to include parents meaningfully in their child's school journey following the transition from primary to secondary schooling. There was some recognition by the Mossbourne

Federation that, in focusing on the key aims of academic success for pupils of all abilities and maintaining a safe and calm environment, the social contract with parents had necessarily taken a back seat. There was a sense that the soft skills, and very real kindness, invested by staff in pupils were at risk of being 'unseen' by parents, especially where there is such a prominent focus on discipline. It is obviously difficult for secondary school staff to develop the type of teacher/parent relationship that exists at primary school and this can dent collaboration. Working with limited resources, the busy senior and Federation leadership have prioritised, understandably, pupils over parents, whose contact with staff necessarily reduces after the transition from primary to secondary school. This has had the unintended consequence, for some parents, of creating the type of distance that can erode trust and confidence if left unchecked. This too, in my opinion, explains in part why some parents might have felt unable to raise concerns.

## The Importance of Communication

13. Positive outcomes and parental engagement are not mutually exclusive. It was of note that poor communications within the secondary schools featured heavily in submissions and again seem to have created an undesirable sense of distance. By 'poor communications' I am referring to the messaging coming from the schools generally, parental access to staff and the quality and speed of staff responses to concerns and complaints. Inadequate communications can make an establishment seem inaccessible and can create misunderstanding. This is starting to happen at Mossbourne.
14. More open and positive messaging from the schools about school life would hopefully lead to a stronger connection between staff and parents. The scope for misunderstanding might be reduced if the schools explained some of their rationales about the Pupil Behaviour Policy or curriculum support in clear but more empathetic language on the websites, in written communication and in public statements. The schools have recognised that it is important to keep parents regularly informed about events and achievements i.e. about the positive and enjoyable aspects of education. The secondary schools have started taking additional steps in this direction, such as the recent introduction of a fortnightly news bulletin and increased publicity about awards and pupil achievements. There was some recognition in my meetings with the school leaderships that, to date, the secondary schools may have appeared at times unapproachable. If this impression exists, it is one that they wish to rectify.
15. The inevitable reduction in contact between parents and schoolteachers once a child has entered secondary school has probably created a cultural distance which has perhaps not received the attention it deserves. This may be particularly pronounced following the Covid pandemic, when parents educated their children at home and families may have become more detached from teachers and schools generally. This has left a section of the parent community feeling genuinely disconnected. Lack of access to staff at the secondary schools featured repeatedly in submissions and demonstrably fed into the lack of confidence in raising concerns and complaints. As all parents of teenagers will know, the close nurturing environment of primary school, where parent/teacher contact is high, changes dramatically at the transition to year 7. The reassuring daily contact with staff at the school gate ceases to exist for parents with pupils at secondary school and the opportunity to develop collaborative teacher/parent relationships is very limited. Perhaps this transition has been more challenging for some parents following the pandemic.
16. Unlike some other schools, the four Mossbourne schools have a policy whereby parents cannot email or telephone teachers directly. Parents' ability to contact teachers and staff is indirect and sometimes inefficient. There is justified parental frustration about this and it presents a potential



barrier to parental attempts to raise problems and issues informally. This frustration was acknowledged by some of the staff that I spoke with and identified as an area where improvement was required.

17. Explaining to parents why it is impracticable to email or telephone teachers directly would help to lower the perception of aloofness. Parents would probably be more confident about raising concerns if the channels of communication with relevant staff members were more efficient. Having said this, there is a responsibility on parents to use the available methods of communication. Each pupil has a planner book that is viewed by staff every day and which parents are supposed to sign every week. Parents can write messages in the planner for form and subject teachers and are encouraged to do so. I did not receive any information to suggest that this would be particularly problematic for most parents, although I note the very real diversity of the Hackney community and the limitations of communicating by brief written exchanges in a pupil's book. Using the planner as it is intended to be used would be a timely and easy way for parents to make enquiries and send messages to teachers, especially in circumstances where they may have struggled to get through to the school on the telephone. Some of the staff that I spoke with expressed frustration that this quick and simple line of communication was not being used in the way it should be by some parents.
18. Numerous parents complained about the speed and quality of response from staff after they had left a message with the school reception. This was often in the context of wishing to have a relatively informal conversation about an issue or concern. They told me that it was not uncommon for there to be an unacceptable delay in response or sometimes no response at all. As I have indicated, a not insignificant number felt that their expression of concern was met with an unreceptive response. Obviously, I had no way of testing the accuracy of this in an individual case. Furthermore, the quality and respectfulness of a response from an individual staff member is not something that is easily monitored or controlled. This was a sufficiently recurring theme for me to conclude that the speed and content of communications following a contact from a parent was not always as satisfactory as it could be. I have made recommendations about this.

## The Pupil Behaviour Policy

19. A significant number of parents referred to the Mossbourne Pupil Behaviour Policy in our meetings. Some were very enthusiastic about it and there was quite a strong sense that most pupils appreciated the effects of the policy, especially the calm and stable learning environment created by it. Some parents expressed an ideological concern about the policy or about a particular rule. It is no part of my task to engage with such concerns.
20. Some contributors felt that the Pupil Behaviour Policy had been inflexibly applied to their child in circumstances where some adjustment could and should have been made, or where the teacher had misjudged a situation, leading to unfairness and avoidable upset. This was sometimes in the context of a pupil with a learning difficulty, or with mental health issues or a neurodiverse condition. I was obviously not able to assess the merit of such concerns, which I am satisfied were genuinely held.
21. It is right to observe that each of the four schools successfully educate a truly significant number of pupils with protected characteristics, speech and language difficulties, compromised mental health or challenging home lives. It seemed to me that sometimes the expectations placed by individual parents on teachers in this respect was very high and, in a handful of cases, bordering on unrealistic. Even in such cases, it is important that the parents' views can be articulated, hopefully reasonably, and that the relevant staff provide a meaningful explanation for the decision under scrutiny. This process goes directly to the critical issues of parental engagement



and good communications. I have little doubt from what I was hearing that some staff have responded to well-intentioned and sincere parental concerns on this front by simply pointing to a rule and dispatching the parent, who has left the process and the conversation feeling unheard and insignificant. Parents and staff referred to the mantra (and to being told words to the effect of) "*It's the Mossbourne way or the highway – take it or leave it*". If that is correct, it is not surprising that some parents feel that the schools' well-advertised and ambitious philosophy is being pursued, on occasions, in a myopic way which discourages collaboration. The schools state in their behaviour policies that they will take into account the individual needs of pupils by applying '*rigidity with flexibility*'. I heard repeatedly from parents that the rigidity usually trumped the flexibility to the point of dogma. The school leaderships could provide fresh guidance to staff about the importance of listening, of communicating with parents informatively and of solution finding in this context. But it also obviously requires parents to come to such conversations with reasonable expectations and with their own readiness to listen to staff.

22. There was no evidence that parents had been disenfranchised from complaining about the more serious outcomes of suspensions or exclusions. There were numerous submissions about the issue of staff shouting at pupils. I explored this because of the clear implication that if schools knowingly tolerated this type of behaviour, they were unlikely to listen meaningfully to concerns about teacher conduct. I spoke to staff of all seniorities about this issue and received very mixed responses. Almost all indicated that, in limited circumstances and depending on the context, there is a clear need to raise one's voice. The majority of staff felt that shouting was not an area of concern, whilst a few disagreed. I received a low level of submissions suggesting that on isolated occasions, the shouting had crossed over into the personal or belittling. There were sufficient references to raised staff voices from parents, pupils and staff for me to conclude that there may have been some instances of unnecessary shouting, particularly at Mossbourne Victoria Park Academy, but it is impossible to reach a settled conclusion about this issue which is, in any event, beyond the remit of my review. Whilst I could find no link between alleged shouting and a lack of confidence in making a complaint, it is possible that parental perceptions about the high levels of discipline at the schools has discouraged some from expressing their concerns. I have recommended that some guidance and clarity is inserted into the Staff Code of Conduct to provide a basic benchmark by which staff, parents and pupils can appreciate the boundaries of voice levels.

## The Recording of Complaints

23. I examined the way in which the schools record complaints. This is an important index of accountability and transparency. Record keeping of concerns and complaints was technically compliant with statutory guidance. Given recent events and the general desirability of learning lessons, I have recommended that record keeping should be expanded and developed. This will enable the individual schools and the Federation to identify trends and where necessary, review its practices in the spirit of reflection and improvement that should operate in every educational establishment. This is currently happening in the primary schools but not in the secondary schools. Complaints data from each school should therefore be provided to and analysed by the Federation through its Risk and Controls Committee to monitor trends, improve transparency and maintain a positive culture.

## Key Recommendations

1. **Make the Complaints Policy more accessible and visible.**
2. **Improve complaint recording and tracking.**
3. **Strengthen staff training on communication.**
4. **Improve communication channels with parents including enabling email enquiries and improved call handling.**
5. **Provide more clarity about the parent/staff communication policy and use communications to increase transparency about school life.**
6. **Ensure public messaging from the schools and Federation (including messaging around the Pupil Behaviour Policy and Complaints Policy) reflects a culture of openness and fairness.**

# A. Background and Introduction

## 1. The Purpose of this Review

- 1.1 On 3 April 2025, I was commissioned to conduct an independent review into the current complaints and safeguarding policies and procedures at four academy schools within the Mossbourne Federation (the "**Federation**"). The Federation is a multi-academy trust, comprising seven academies. One of its academies, Mossbourne Victoria Park Academy ("**MVPA**"), has recently been the subject of numerous concerns regarding staff behaviour and pupil welfare.
- 1.2 The request was made by the Mossbourne Members' Trust, acting distinctly from the governors, executive or staff of the Federation and individual academies.<sup>2</sup> I was asked to report directly to a sub-committee formed specifically for the purpose of the review. The sub-committee consisted of the following individuals: Daniel Flitterman, a member of the Mossbourne Federation, Tareic Alphonse, a local resident who sits on the governing body of Mossbourne Community Academy, and Shedeh Javadzadeh, a former student and board member of the Mossbourne Charitable Trust.
- 1.3 The circumstances in which this request was made are set out in more detail in **Appendix C**. In short, in early 2024 a dossier of some 30 anonymised concerns was coordinated by the parent of a child at MVPA and submitted to Hackney Education, the education directorate for Hackney Council. Some of those contributing to the dossier explained that they would be willing to speak with the Council in due course. It quickly became apparent that a significant number of these individual concerns had not been raised or pursued by parents at school level under the Complaints Policy. The City & Hackney Safeguarding Children Partnership ("**CHSCP**") became involved. Attempts were made to encourage parents with concerns to engage with the school using the school policies. This did not occur, and in or around November 2024 another anonymised or partly anonymised dossier, coordinated by the same parent, was sent to CHSCP, consisting of over 250 concerns.
- 1.4 Although I have not seen either dossier, the Department for Education ("**DfE**") provided me with a high-level summary which set out the broad themes raised. I understand that some of the concerns in the dossier suggested that there was a direct and adverse correlation between MVPA's strict enforcement of its Pupil Behaviour Policy and pupils' welfare and alleged decline in mental health. There were apparently also concerns about inadequate support for students with mental health issues, with reports of teachers ridiculing such students and instilling disproportionate fear. The school was accused of failing to consider students' individual needs, particularly those with Special Educational Needs or disabilities, mental health issues, or challenging circumstances. On 11 December 2024, after consultation with its safeguarding partners, the CHSCP instigated a Local Child Safeguarding Practice Review, headed by Sir Alan Wood, principally into MVPA. On 7 February 2025, the CHSCP informed the Federation that none of the accounts that had been submitted indicated that a child was at any immediate risk of significant harm or that urgent action was required in respect of an identified member of staff.
- 1.5 In those circumstances, and without knowing how long Sir Alan's review might take<sup>3</sup>, the Members' Trust was concerned to act quickly and take any necessary steps to try and increase public confidence in the application of its own internal procedures. The DfE suggested that Mossbourne conduct a parallel assessment of its policies and procedures with respect to child safeguarding and complaints handling and consider whether any measures could be taken to improve confidence in the Federation's complaints handling process.

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<sup>2</sup> An organigram of the Federation can be found at Appendix E.

<sup>3</sup> I understand, at the time of writing, that Sir Alan's review is due to conclude in the autumn of 2025.

1.6 It was in this context that I was asked to review specific policies and procedures at **Mossbourne Parkside** and **Riverside** (primary schools) and at **Mossbourne Community Academy** and **Mossbourne Victoria Park Academy** (secondary schools). My task was to check that the policies are fit for purpose, comply with statutory obligations and demonstrate best practice in terms of safeguarding children and handling complaints. I was asked to make recommendations about any necessary changes to the above policies and to identify any other actions that might help to increase confidence in complaints handling and safeguarding within the four specific schools. My review covers the period from September 2023 to date.

1.7 It is very important that those reading this report or any summary of it understand the following:

- It is no part of my task to enter into the ideological debate about academy schools or the current political dialogue about the amount of oversight that Hackney Council has over schools in its borough. My work has focused on the operation and workability of policy documents at four particular schools in the context of safeguarding and complaints.
- I am fully aware of the local publicity surrounding the Pupil Behaviour Policy at MVPA. It is no part of my task to judge the rules and standards of behaviour imposed by the Federation, which parents are required to sign upon their child's admission, but rather to explore how the schools have dealt with any complaints or concerns about the application of the Pupil Behaviour Policy.
- Although numerous parents understandably wanted to talk to me about the concerns they had raised (or chosen not to raise) with the schools, I cannot decide whether any individual grievance which was shared with me, is justified. I have no way of judging the merits of the individual complaints and criticisms that were ventilated, just as I have no way of knowing whether all the positive things that were described to me are correct. It is the task of Sir Alan Wood and his team to decide whether the issues raised in the dossiers have substance. That said, I have listened with great care to everything that I have been told in writing and in meetings and this has enabled me to identify themes and collective concerns.

## 2. Specific Terminology

2.1 'Child Protection' comes under the umbrella term of 'safeguarding' but refers to cases where the child is at risk of or is experiencing significant harm and requires intervention from the state to protect them.

2.2 'Children' includes everyone under the age of 18 for the purpose of this report.

2.3 'EHCP' is an Education, Health and Care Plan, co-ordinated by local authorities for pupils requiring extra health and educational support.

2.4 'LADO' is the local authority designated officer. Such officers manage and oversee allegations against people who work with children.

2.5 'Ofsted' is the Office for Standards, Children's Education and Skills. It is a government department whose work includes the inspection and regulation of schools.

2.6 Any reference to the term 'parent' includes carers and anyone else with parental responsibility.

2.7 'Pupil Behaviour Policy' refers to the Behaviour, Uniform and Appearance, and Attendance policies at Mossbourne Victoria Park Academy and Mossbourne Community Academy.

2.8 'Pupil Premium' refers to funding which is allocated to eligible schools based on the number of:

- (a) pupils who are recorded as eligible for free school meals, or have been recorded as eligible in the past 6 years (referred to as Ever 6 FSM)

- (b) children previously looked after by a local authority or other state care, including children adopted from state care or equivalent from outside England and Wales

2.9 **'Safeguarding'** is defined in the statutory guidance *'Working Together to Safeguard Children'*:  
*"Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:*

- *providing help and support to meet the needs of children as soon as problems emerge;*
- *protecting children from maltreatment;*
- *preventing impairment of children's mental and physical health or development;*
- *ensuring that children grow up in circumstances consistent with the provision of safe and effective care;*
- *taking action to enable all children to have the best outcomes."*

2.10 **'SENCO'** is a special educational needs coordinator responsible for assessing, planning and monitoring the progress and welfare of children with SEND.

2.11 **'SEND'** is the acronym generally used within education to refer to pupils with learning difficulties or disabilities who have special education needs. The term is sometimes used for ease in this report to refer to pupils requiring additional curriculum support.

2.12 **'SLT'** is the senior leadership team of a school and includes Principals and Vice Principals.

### 3. My Approach

3.1 I am the sole author of this report and the views expressed in it are mine alone. I have been assisted in my work by a small, ring-fenced team of solicitors at Fieldfisher. They have helped co-ordinate the call for evidence and the requests and receipt of relevant information. They have scheduled meetings and taken notes at them. No-one from the Members' Trust, Federation, including the sub-committee referred to at paragraph 1.2 above has tried to influence either how I have gone about my work or my conclusions. I have been left to conduct the review without interference.

3.2 I have been able to access the relevant legislative frameworks which underpin the provision of education and safeguarding in academy schools. I have also had access to the available statutory requirements and guidance concerning behaviour, safeguarding and the management of complaints in academies. This aspect of my work was, to a large extent, a paper exercise, allowing me cross reference the legislation and guidance with the written policies and procedures operating within the four schools.

3.3 On 13 May 2025 I prepared a letter, which was communicated to parents and staff at the four schools, containing an explanation about this review and an invitation for people connected with the schools to provide me with relevant information about their experiences of safeguarding and complaints handling at the schools. A copy of this letter can be found at **Appendix B**. The Hackney Citizen, at my request, kindly published details about the review so that as many local people could hear about it and if they wished, contribute.

3.4 In the letter I promised that the information that I received from people affected by the Mossbourne complaints or safeguarding processes would be treated in confidence. Accordingly, nothing will appear in this report that would identify or tend to identify any person who responded to the call for evidence.

3.5 In May and June 2025, I held all day surgeries at a workspace in Hackney where I was able to meet face to face with individuals who had contacted the review. This included parents, carers, pupils,

former pupils and staff. I also conducted a series of meetings online with those whose availability was more limited. I am very grateful to everyone who took the time to contribute in this way. On the back of those meetings and my own research, I made written requests for information from the Federation and from each of the schools, and I received detailed written replies.

- 3.6 Once in possession of sufficient material, I sent out requests to meet with specific personnel from the Federation and schools. As a result, I have conducted meetings with key staff from each of the four schools, including members of the SLT, and with key Federation individuals. I placed a particular emphasis on meeting with members of the pastoral teams at MVPA and Mossbourne Community Academy ("**MCA**") because their work includes responsibility for behaviour and safeguarding. I also met with administrative staff whose task it is to assist with communications between parents and staff. I am extremely grateful to everyone for making themselves available to meet with me at what was a very busy time in the school calendar.
- 3.7 As I say, I am not tasked with making findings of fact about individual complaints or whether a particular policy has or has not inappropriately affected the welfare of a particular pupil or cohort of pupils. Furthermore, the guarantee of confidence to individuals speaking with me means that it is not possible to set out the precise details of their experiences. During my meetings, specific and relevant themes emerged and recurred and I have considered the probable substance of those themes, which are described in the body of the report. In summary, they concern communication, parental engagement and streamlining certain aspects of policy. They are linked to one another and have the capacity to affect the way in which the culture of the schools is perceived.
- 3.8 My findings are based upon *all* of the information that I received.

#### 4. The Federation and the Schools

##### *The Federation*

- 4.1 The Mossbourne Federation is a multi-academy trust. Day-to-day governance is carried out in accordance with the Academy Trust Handbook and Governance Guide, both issued by the DfE. The Federation is subject to oversight and inspection by the DfE and Ofsted. The Federation receives funding from the DfE on the terms set out in a Funding Agreement. It is also supported by the Sir Clive Bourne Charitable Trust as a sponsor. However, the Federation receives some funding, and is subject to some oversight, by the local authority with respect to its services to children with SEND. Academy trusts are '*relevant agencies*' for the purpose of the Children Act 2004 and must be fully engaged and included in safeguarding arrangements made by local safeguarding partners, including the CHSCP.
- 4.2 The Federation's governance structure consists of multiple tiers, from the Members' Trust at the top, cascading down, via the Central Governing Body to the individual Principals and SLTs of the specific academy schools. The Central Governing Body has collective accountability and responsibility for the Federation, and amongst other things provides strategic leadership. It has responsibility for ensuring that there is a central governor for safeguarding and there is a sub-committee for Risk and Control. There is a chief executive officer ("**CEO**") and each academy has its own local governing body. The handling of individual allegations against staff is primarily undertaken by the Principal of the relevant academy, who must (in certain circumstances) refer matters to a Local Authority Designated Officer ("**LADO**").<sup>4</sup> However, trustees retain the ultimate statutory duty to safeguard and promote the welfare of children.

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<sup>4</sup>Part Four, '[Keeping children safe in education 2025](#)'

### *The Schools*

- 4.3 **Mossbourne Riverside ("MRA")** is a mixed primary school with 602 pupils.<sup>5</sup> Some 12% of pupils have SEND requirements, 22% pupils qualify for pupil premium funding and 2% of pupils have an EHCP.
- 4.4 **Mossbourne Parkside ("MPA")** is a mixed primary school with 401 pupils. Some 30% have SEND requirements and nearly 60% qualify for pupil premium funding. 3% of pupils have an EHCP.
- 4.5 **Mossbourne Victoria Park Academy ("MVPA")** is a mixed, non-selective secondary school offering places for students between 11 and 16 years of age. It currently has 840 pupils. The number of pupils qualifying for pupil premium funding is nearly 50%. One in 5 pupils have SEND requirements and 5.5-6% have an EHCP, both statistics being significantly above the national average.
- 4.6 **Mossbourne Community Academy ("MCA")** is a mixed non-selective secondary school for students between 11 and 18 years of age, currently with 1,432 pupils. The number of pupils qualifying for pupil premium funding is 50%. Some 29-30% of pupils are registered with SEND requirements and some 8% have an EHCP.
- 4.7 Each school is situated in Hackney.

## **5. Ofsted**

- 5.1 The schools have been inspected by Ofsted in recent years. The reports are available online on the government website. Inspections do not focus upon the implementation of the Complaints Policy, but they do scrutinise the delivery of education to pupils with SEND.
- 5.2 **MCA** was inspected in September 2021 and Ofsted graded the school's overall effectiveness as "*outstanding*". Pupils with SEND, and those who are disadvantaged, were found to achieve the highest standards. The provision for pupils with SEND was noted to be "*first class*". The inspector found that leaders gave priority to disadvantaged pupils to help ensure that they realise their full potential.
- 5.3 **MPA** was graded as "*good*" during an inspection in October 2021, with the inspection concluding that pupils with SEND were well supported in and out of the classroom, and that staff understood the needs of pupils with SEND.
- 5.4 **MVPA** was assessed as "*outstanding*" in January 2023. The relevant report noted that "*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.*"
- 5.5 **MRA** was inspected in November 2024 and received an overall effectiveness of "*outstanding*". Pupils, including those with SEND, were noted to achieve very highly. The report concluded that pupils with additional needs were identified swiftly, that staff work closely with parents and carers and external organisations to implement appropriate support for pupils and that staff expertly adapt learning activities for pupils with SEND so that they access the same curriculum as their friends.

## **6. Summary of Responses**

- 6.1 I received 148 separate submissions from individuals in response to the call for evidence. Of these, 31 were out of scope because they were not relevant to my terms of reference. A further

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<sup>5</sup> Pupil numbers are based on data for the academic year 2024-2025



20 could not be fully relied upon because they lacked sufficient detail. Some submissions referred to more than one school. Only 3 concerned MPA and 17 concerned MRA. The vast majority involved MVPA and MCA and I have therefore focused most of my attention on these schools. The majority of the submissions came from parents, though 12 were from staff and 3 from students.

- 6.2 Of the 117 in scope submissions (including those that lacked factual detail) 40 were essentially positive and 74 essentially negative. The positive submissions expressed support for the following:<sup>6</sup>
- (a) The safe and disciplined learning environment.
  - (b) The consistently high academic attainment, including for pupils with EHCPs and SEND and for pupils from underprivileged backgrounds.
  - (c) The strictness of the rules and their democratic application.
  - (d) The way in which a particular complaint or concern was handled, especially in respect of a pupil with special needs.
- 6.3 The negative submissions (whilst sometimes recognising the academic attainment and calm environment) focused mainly on:<sup>7</sup>
- (a) Dissatisfaction about the way in which a concern had been handled, including the time it took (13), an over-defensive attitude on the part of the school to the concern that was being raised (28) or a sense that the school was not taking the concern seriously (31).
  - (b) An unnecessarily strict application of the Pupil Behaviour Policy adversely impacting on the welfare of a pupil (30). Some complained that when imposing a sanction, the school inflexibly failed to consider the individual mental or physical health of the pupil or the pupil's cultural heritage.
  - (c) Specific incidents of inappropriate shouting or the use of belittling language towards a pupil (30), with a few suggestions (7) of indirect race discrimination in this context.
  - (d) A failure to listen properly to parents (29), often in the context of concerns about pupils with mental health or neurodiverse issues and parents not feeling included in the fabric of the school.
  - (e) Poor communication systems and messaging (52<sup>8</sup>), leaving parents feeling as though they are deliberately or inadvertently being kept at arm's length.
  - (f) A sense that the SLTs do not particularly listen to other more junior staff (7).

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<sup>6</sup> In each instance the majority concerned MCA and MVPA

<sup>7</sup> In each instance the majority concerned MCA and MVPA

<sup>8</sup> 46 submissions referred to at least one Mossbourne academy, 6 submissions referenced poor communications but did not specify which academy.

## B. Are the Various Policies Fit for Purpose?

### 7. Introduction

7.1 I was asked to consider the following policies:

- (a) Pupil Behaviour Policy;
- (b) Child Protection and Safeguarding Policy (the "**Safeguarding Policy**") ;
- (c) Complaints Policy;
- (d) Governance Policy;
- (e) Policy for dealing with vexatious complaints;
- (f) Staff Code of Conduct; and
- (g) Whistleblowing Policy.

7.2 My task was to check whether they are fit for purpose, comply with statutory obligations and demonstrate best practice in terms of safeguarding children and handling complaints. While the Pupil Behaviour Policy is school-specific, the other policies are uniform across all four schools and are set by the Federation.

7.3 I wish to make clear that I was not confronted with any evidence that staff, within the four Mossbourne schools, misunderstood their *child protection* responsibilities or had failed in the application of those responsibilities. I did not consider that the concerns expressed to me indicated that the schools or staff were failing to recognise serious issues such as abuse, neglect or exploitation or that the public sector equality duty in section 149 of the Equality Act 2010 was taken other than seriously. I received no information to suggest that the schools were failing in their duty towards looked after children. No-one suggested that schools or staff were failing in their duty to make statutory referrals to the local authority children's social care, i.e. failing to act in situations where there were concerns that a child was suffering or was likely to suffer significant harm. I have already noted, in this context, that on 7 February 2025, the CHSCP informed the Federation that notwithstanding the various allegations made by parents, none indicated that a child was at any immediate risk of significant harm or that urgent action was required in respect of an identified member of staff. The safeguarding structures within the school are clear and comply with statutory requirements.

### 8. Compliance with current legislation and best practice

8.1 In the interests of keeping this report readable, I have not felt it necessary to set out the entire legislative framework underpinning academy schools. I have listed the key legislation and associated guidance from the DfE in **Appendix A**. These contain detailed mandatory requirements ('must') and discretionary actions ('should'). The discretionary suggestions represent minimum good practice which the Federation Trust should apply unless it can demonstrate that an alternative approach better suits their circumstances. I have compared those requirements and suggestions with the content of the Mossbourne policies listed above in paragraph 7.1 above and with information that I have received about staff induction and training. In conducting this exercise, I focused on safeguarding, complaints (whether by parents or staff) and standards of staff and pupil behaviour.

- 8.2 In a strict sense, and unless indicated to the contrary below, the policies listed at paragraph 7.1, taken individually and in combination, comply with the current statutory obligations. In most respects they closely resemble countless similar policies in use within the educational sector and within academy schools.
- 8.3 I have noted an anomaly about section 100 of the Children and Families Act 2014 and the associated guidance about it. Academy schools must make arrangements for supporting children at school with medical conditions. The guidance sets out the relevant duties and explains that schools should have a policy about this. It emphasises the need for the schools to use their best endeavours to ensure that children with medical conditions and/or SEND engage in the activities of the school. It emphasises that it is crucial that schools receive and fully consider advice from healthcare professionals and listen to and value the views of parents and pupils. At the moment no such policy is available on the Federation or the schools' websites. One did exist but it was felt that it was not adequate and is in the process of being revised. I was informed that the new policy will be available from September 2025.
- 8.4 I was satisfied from my meetings with a wide variety of staff members, including teachers, SENCOs, Designated Safeguarding Leads and other members of the various SLTs and governing body that school staff and, where required, governors, are appropriately trained in and know how to apply the school policies.
- 8.5 The policies are therefore, generally fit for purpose. The real test of a policy however is how it works *in practice* and this depends entirely on the people using and applying the policy, especially the Complaints Policy. This goes for complainants as well as school staff. An unrealistic expectation or attitude will always lead to dissatisfaction, just as an overly defensive or dismissive response by the school risks reducing parental confidence in the point of raising concerns. A complaint requires an open mind and measured approach from everyone involved, regardless of its merit. It also requires good communication. I deal with this in **Part C** below.
- 8.6 By looking at the statutory requirements and analysing the information that I received from the schools and parents, I have concluded that there is scope for improving the procedures both on paper and in practice. By this, I mean:
- (a) changing the content of parts of the policies to make them more user-friendly;
  - (b) improving the quality of the communications when dealing with complaints; and
  - (c) keeping a better record of all concerns and complaints.

## 9. Complaints

- 9.1 Part 7 of the **Education (Independent School Standards) Regulations 2014** requires academy schools to draw up and effectively implement a complaints procedure. The procedure must be in writing, set out timescales, allow for informal resolution and consist of various stages including a panel with one independent member. The regulations require the schools to keep a written record of any complaint that is not resolved at the initial informal stage. The Mossbourne Complaints Policy complies with this. It has numerous stages, each of which attracts a specific timescale:
- (a) **Stage 1** – this is used for dealing with a complaint informally in the hope of reaching an early resolution, usually by way of a conversation or meeting. The vast majority of complaints are resolved at this stage.
  - (b) **Stage 2** – if unresolved at Stage 1, the complaint is put in writing, investigated and, more often than not, determined by a member of the SLT.

- (c) **Stage 3** – if unresolved at Stage 2, the complaint is escalated, investigated at the direction of the CEO and determined by the relevant investigating officer or CEO.
- (d) **Stage 4** – if unresolved at Stage 3, the complaint is referred to the Governing Body Complaints Panel. The matter is determined at a hearing. The panel consists of two governors of the Federation Governing Body, one of which is independent of the management and running of the school.

9.2 *'Best Practice Guidance for Academies Complaints Procedures 2021'* states that academy schools should ensure that the complaints procedure is:

- simple to understand and use
- impartial
- non-adversarial
- enables a full and fair investigation
- where necessary respects confidentiality
- addresses all the points at issue and provides an effective response and appropriate redress, where necessary provides information to the senior management team so that services can be improved

9.3 As I was asked to consider what steps can be taken to increase confidence about making complaints, I thought it was important to see how the above requirements and guidance translated into the Mossbourne Complaints Policy. In so doing I have borne in mind that these schools are operating in a very diverse community. There are some parents for whom English is not the first language or for whom literacy and inclusion remain a challenge. For some, time is deeply constrained through work and/or caring commitments. There may exist a cultural reluctance to engage in a formal written process. Others, particularly after the Covid pandemic, may have elevated levels of anxiety about their children whether generally or in the context of SEND provision. It is precisely for these complex reasons that clarity and a non-adversarial attitude is required when dealing with complaints.

9.4 I have scrutinised similar policies operating in other schools, not just academy schools, to see how they differ in presentation and content and whether they can assist in improving the content of the Mossbourne policy.

### 10. **Scope of Complaints Policy and Safeguarding Policy: concerns about the welfare of pupils**

10.1 Although none of the submissions I received concerned child protection, a significant number related to what I would term the wellbeing of the pupil. Policy around this is obviously important. Whether you call this 'safeguarding', 'wellbeing' or 'welfare' should not matter. It was clear to me that parents thought that welfare and safeguarding meant the same thing. When I made written requests for information from the four schools, I note that at least two schools thought that they meant the same thing too.

10.2 The process for complaining about the way in which a staff member has handled a situation or treated a pupil should be clear and accessible. It should not require a parent to know the precise definition of 'safeguarding' or of 'child protection' and school staff should know immediately how to triage such an issue.

10.3 The **Mossbourne Complaints Policy**, which one might think would be the obvious vehicle for this type of concern or complaint, expressly states on page 1 that it does not apply to 'safeguarding' matters. Any reasonable parent might therefore quickly conclude that the Policy does not apply to *welfare* related concerns. Yet when I asked each school which policy a parent should use when

wishing to challenge a decision affecting a pupil's welfare, I was essentially told by three of the schools that a parent should use Stage 1 of the very policy that they are told not to use.<sup>9</sup> This is confusing but it also creates an immediate and avoidable barrier especially as parents are not conveniently signposted elsewhere.

- 10.4 I therefore turned to the **Safeguarding Policy** to see what it said about parental concerns or complaints about safeguarding i.e. about welfare.
- 10.5 Section 7 is headed "*Safeguarding Concerns & Allegations Made About Staff.../Person working in or on behalf of the Mossbourne Federation.*" The section starts with a section on what *staff* can do in such a situation and goes on to refer to a situation where *a child* makes an allegation. Nowhere, as far as I could see, does the Policy make any reference to a *parent*. It would have to be assumed that the section about a *child* making an allegation includes by implication a *parent* making such an allegation on behalf of the child. This is unnecessarily opaque and should be clearer. I am reinforced in this by the fact that when I asked each school whether section 7 actually applies to parents, I received conflicting responses.<sup>10</sup> If the schools don't know, how can they expect the parents to know? I asked the Federation whether section 7 applied to parents and was told that it does not. When I asked the Federation whether this Policy explained to parents what they should do if they have a concern or allegation to make about staff, I was informed that parents are told at transition (the move from primary to secondary school) to contact the Head of Year in MVPA or MCA and to contact the form teacher at MPA and MRA. I did not consider this to be realistic in terms of ensuring that parents have adequate information about how to raise a concern. I understand from my meetings with the Federation that it is taking steps to address this. Senior pastoral staff recognised that the route for welfare related parental complaints could be made clearer and more explicit. As a consequence, there are plans to review the policies and to clarify the formal route by which a parent can raise a complaint or concern. This is to be welcomed.
- 10.6 I note, in this context, that in the MVPA and MCA SEND Information Reports, which the schools are required to (and do) publish on its websites, it states:
- "Complaints regarding children with SEND, about their provision or about any other matter, should be made following the academy's 'Complaints Procedure', which can be found on the academy website: [www.mvpa.mossbourne.org](http://www.mvpa.mossbourne.org). Complaints for children with SEND will comply with The Special Educational Needs and Disability Regulations 2014 and will follow the Academy Complaints Procedure in liaison, as appropriate, with the Head of SEN Inclusion (SENDCo)."*
- 10.7 Whilst this is helpful information, it should be contained in the actual Complaints Policy which is where a parent would expect to find it, rather than in an annually published statutory report that most parents probably do not read. This is particularly important given that a significant number of concerns or complaints relate to pupils with SEND, of whom there are an above national average at both schools.
- 10.8 The failure to explain in clear language which policy parents should use when wishing to report a concern or complaint about staff treatment of a pupil in a welfare, safeguarding or SEND context is a potential barrier and should be rectified. It should be made clear to parents which policy they should use within the body of both the Complaints and Safeguarding policies and on the website (as opposed to a simple link identifying a policy).

<sup>9</sup> Two said 'Stage 1 Complaints Policy', one said 'it depends. But if in doubt use the safeguarding policy', one said 'Stage 1 Complaints then decide upon the pathway'.

<sup>10</sup> Two said it applied just to staff and two said it applied to staff and parents, one suggested that all safeguarding complaints would be managed under stage 1 of the Complaints Policy but then triaged back to the Safeguarding Policy if unresolved.

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*Recommendation: The Safeguarding Policy and Complaints Policy should be aligned and, along with the Federation and schools' websites, should provide clearer guidance to parents on how to report concerns or complaints about staff conduct towards a pupil affecting welfare or wellbeing or in a safeguarding or SEND context, and what policy should be used.*

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- 10.9 Section 7 goes on to reference '**low-level concerns**'. These are issues about conduct short of child protection/harm threshold issues but which nonetheless evoke a nagging concern, doubt or worry that a staff member has acted in a way that conflicts with the appropriate professional standards. It is a concept that is designed to create a collaborative environment in which adults, often employees, feel able to call out behaviour at work which causes them concern. The intention is to address the issue quickly and professionally without the need to make a formal complaint or instigate disciplinary procedures. '*Keeping Children Safe in Education*' ("**KCSIE**") contains critical guidance from the DfE about how to safeguard and promote the welfare of school children. It makes it quite clear that low-level concerns can in fact originate not just from staff but from pupils, parents or any other adult. It seems to me that a low-level concern could include the type of issues that Mossbourne parents have expressed concern about, such as shouting, an inappropriate comment or sanction, or a failure to make a reasonable adjustment. It is therefore an important category of concern.
- 10.10 KCSIE advises schools to record all low-level concerns and to deal with them effectively. It stipulates:
- "As part of their whole school or college approach to safeguarding, schools and colleges should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately."*
- 10.11 The Mossbourne low-level concern procedure is in an appendix to the Safeguarding Policy and is undetailed. There is a reference to 'internal procedures' but these procedures are not spelt out and they should be. The reference to low-level concerns in section 7 does not explain whether it is a mechanism just for staff or for parents too. Again, I asked each school about this and received slightly different replies, two of which stated that the schools would not expect parents to understand and define a low-level concern. I asked the Federation and was told that a parent could raise a low-level concern even though this is not specified in the Safeguarding Policy.
- 10.12 The low-level concerns procedure should be given greater prominence in the Safeguarding Policy and the procedure itself should be set out in better detail both there and in the Staff Code of Conduct. It should explain clearly that it applies to parents. If the reality is that any low-level concern by a parent will be treated as a Stage 1 complaint, then both the Complaints Policy and Safeguarding Policy should say so.

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*Recommendation: Give the low-level concerns procedure greater prominence in the Safeguarding Policy, Complaints Policy, and the Staff Code of Conduct, setting out further detail on its operation and making it clear that it applies to parents, pupils and staff. Each document should explain in the main text (as opposed to in a signposted appendix) how a low-level concern differs from other types of concern. More information should be provided about the various ways in which the low-level concern might be managed.*

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10.13 I was informed by the leadership of MVPA that each November, governors are informed of the number of low-level concerns but not the specifics. This is unlikely to be of much assistance. It is far better that the governors are additionally informed about the nature of the concerns and any steps taken to address them. The governors and Federation Risk and Controls Committee of the Central Governing Body should receive an annual summary from each school of the number of low-level concerns, with an anonymised breakdown of which category of person has raised the concern (parent or teacher etc.) and a separation of the concerns into themes so that the level and nature of such concerns can be understood. I discuss this further at paragraph 12.8.

#### 11. Is the Complaints Policy simple and easy to use?

11.1 I considered whether the Mossbourne Complaints Policy is simple and easy to use, in accordance with the Best Practice Guidance, bearing in mind the community in which it operates. I have already explained that I believe that the Complaints and Safeguarding Policies are ambiguous about the available mechanisms for a parent to complain about staff conduct toward a child.

11.2 I received mixed views from both parents and staff about whether the Policy was easy to use in practice. I compared the Mossbourne Policy to other policies operating within the education sector and to the current model complaints procedure for academy schools provided by the government on its website. The Federation obviously has a degree of autonomy about the contents of its Policy and whether to implement the discretionary aspects of the Best Guidance Practice. I am aware that it is not bound to adopt the model policy.

11.3 The Complaints Policy does set out clearly the various stages through which a complaint can travel and it explains how that can be adapted if the complaint is against a Principal, or governor or against the CEO of the Federation. It provides a sample form that can be used to convey the substance of the complaint and explains where this should be sent.

11.4 In that strict sense, it is a relatively straightforward document. Experience shows that many individuals find complaints policies daunting at the best of times. Three contributors identified language barriers either as a reason for not complaining or to explain why the process was particularly challenging. One senior leader within MPA felt that most parents didn't use the policies, particularly because of language issues but felt that this made little difference as the parents knew to raise issues informally either at the school gates or by telephoning the school office. More than one parent observed that the Policy might seem impenetrable to some.

11.5 I do not consider that the Policy is particularly difficult to understand but I note that other schools include a schematic to summarise and simplify the main policy and I think that the model policy is probably more accessible. I recommend that the Complaints Policy includes an 'at a glance' table or schematic on one page to summarise the stages. Such a graphic can be found in other similar policies. It should be indicated more prominently that a complainant may bring someone with them to a meeting to assist with communications where language or other cultural barriers exist.

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*Recommendation: Provide a one-page graphic in the Complaints Policy to signpost potential complainants to the available processes.*

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*Recommendation: Indicate more prominently in the Complaints Policy that a complainant may bring someone with them to a meeting to assist with communications.*

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11.6 Further and in the interests of making the Complaints Policy more accessible, I do note the following.

11.7 First, the Policy refers only to complaints and does not define what this means. The model complaints policy for academies provides (my emphasis):

*"A concern may be defined as 'an expression of worry or doubt over an issue considered to be important for which reassurances are sought'."*

*"A complaint may be defined as 'an expression of dissatisfaction however made, about actions taken or a lack of action'."*

11.8 Second, the model policy clarifies that a concern or complaint can be made in person, in writing or by telephone or by a third party acting on behalf of a complainant, so long as they have the necessary consent to do so. I received mixed viewpoints from parents and from the schools about *how* complaints should be made. The Policy itself says that all Stage 1 complaints should be raised via telephone, by arranging an appointment via reception, or a note in the student planner. In that sense the schools are providing some flexibility in how a Stage 1 complaint is made. The ability to complain by email is conspicuously absent. The Policy says that all Stage 2 complaints should be set out in writing and sent to the Principal's PA. I heard anecdotally from contributors that they had been told to hand deliver a letter, others were told that they could not email a complaint. MVPA and MCA were very clear in their responses to me that they discouraged complaints by email. In 2025, it might be said that there should be no impediment to receiving complaints by email as it represents an unjustified barrier. Although I **recommend** that this form of communication be permitted and expressly catered for in the schools' policies, I note that the Federation is alive to this issue already and has introduced a bespoke complaints email address as a pilot in one of its schools outside of Hackney. By this means, parents can communicate with the school and raise both concerns and complaints on an informal basis initially and where necessary that will feed into a formal complaints referral mechanism. So far, the system has been working well and it has provided the school with useful insights. The Federation hopes to roll out this system more widely in September 2025 and I have no doubt that this will simplify communications and promote transparency.

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*Recommendation: The Complaints Policy and school websites should distinguish between a complaint and concern, explain that either a complaint or a concern can be raised in any way or via a third party who has obtained consent to act on the complainant's behalf, and provide an email address for complaints.*

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## 12. Recording Complaints

12.1 The rationale for recording concerns and complaints is straightforward. Recording helps an establishment identify:

- (a) the number of complaints;
- (b) patterns of staff conduct that require attention and staff training/awareness;
- (c) whether a rule or policy is disproportionately affecting a particular cohort of pupils – whether along the lines of age, ethnicity, SEND or otherwise;

- (d) whether a particular staff member is being complained about more frequently than others and requires professional development or discipline;
- (e) whether a particular parent is making a disproportionate number of complaints;
- (f) whether concerns and complaints are being resolved in accordance with the timetable set out in the relevant policy;
- (g) depending on the complaint, whether staff/parents are utilising the low-level concerns policy;
- (h) cultural perceptions of those interacting with the establishment;
- (i) parental engagement with the Complaints Policy; and
- (j) whether there needs to be revision to the schools' policies.

12.2 Monitoring these issues helps to demonstrate accountability and transparency.

12.3 I consider that the statutory duties and guidance about recording matters of concern are potentially confusing for schools. For example, Part 6 of the Education (Independent School Standards) Regulations 2014 imposes a duty on academy schools to keep a record of all complaints that proceed to the formal complaints process.<sup>2</sup> As a result, a school can justify a failure to record Stage 1 complaints. However, a Stage 1 complaint might amount to a low-level concern about which there *is* a mandatory duty to keep a record. Furthermore, a Stage 1 complaint might relate to a parental concern about a pupil with SEND provision in which case the school is advised, under current government guidance, to keep a record.<sup>11</sup>

12.4 I asked each school to explain their own processes for recording complaints.

12.4.1 Historically neither MPA nor MRA have recorded Stage 1 complaints. More recently each has introduced a tracker or spreadsheet of concerns and complaints. The aspiration is to capture and record everything from the trivial to the more serious so that the school can track common themes. This includes Stage 1 complaints. The receptionists populate and triage the issues and staff are trained to ensure that a particular issue is recorded. The Principal can access the tracker at any time. The schools have not found this particularly difficult to set up or to operate, although they are much smaller than either MVPA or MCA. There is a natural concern that not every single issue is captured but it is already providing the leadership with a fuller understanding of the type and number of concerns coming through. As the schools also have a behaviour tracker, they are able to monitor which pupils might benefit from adjustments to the application of the primary school Positive Behaviour policy. They are not required to record everything but have chosen to attempt to do so, voluntarily, to try and improve and meet the needs of the school community. This is as proactive as it is sensible.

12.4.2 MVPA and MCA do not currently record Stage 1 complaints or keep a central record of complaints; by this, I mean the complaints are not collated in such a way that would enable someone to provide a breakdown of the numbers or categories of complaints. Stage 2 and above complaints are recorded per pupil. Short of going through each individual pupil file, this prevented the schools from providing me with specific information, such as the number of complaints relating to pupil welfare, the stage at which complaints had been resolved, whether complaints disproportionately related to SEND pupils etc. This is something that could be improved relatively easily.

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<sup>11</sup> Paragraph 6.45 of Special Educational Needs and Disability Code of Practice 2015

- 12.5 I asked the Federation whether the Central Governing Body conducted any sort of annual review of complaints data in order to assess risk and possible areas for improvement. They do not.
- 12.6 As I have already explained, the Federation is in process of rolling out a new system for managing complaints and this will soon result in each school keeping a record of Stage 1 to 4 complaints as well as low-level concerns. The Federation recognises the challenge of capturing far more transient or informal conversations (such as at the school gate) and intends to train staff to ensure that where concerns are raised in this way, they are recorded.
- 12.7 I recommend that each school should keep a central record of all complaints and concerns, including Stage 1 complaints and concerns, and conduct an annual review of numbers, trends, compliance with timescales, and any adverse impact of school life on pupils or a particular cohort of pupil. Staff should be made aware of how to record complaints and concerns, and the importance of doing so. I also recommend that the mandatory and discretionary duties set out in the statutory guidance '*Special Education Needs and Disability Code of Practice*' and '*Supporting Pupils at Schools with Medical Conditions*' are reinforced. Staff should be aware of the guidance

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*Recommendation: Ensure all complaints and expressions of concern/dissatisfaction are recorded on a central digital tracker and track progress through the complaints stages. Further data, such as the nature of the complaint and staff member involved, should be recorded to ensure trends can be identified.*

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*Recommendation: Reinforce the mandatory and discretionary duties set out in the statutory guidance '*Special Education Needs and Disability Code of Practice*' and '*Supporting Pupils at Schools with Medical Conditions*'.*

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at paragraph 6.45 of '*Special Education Needs and Disability Code of Practice*' 2015 that schools should take seriously any concerns raised by a parent and that these should be recorded.

- 12.8 The Risk and Controls committee of the Central Governing Body should also conduct an annual audit (anonymised if necessary) of complaints and low-level concerns to assess concerning trends, timescale compliance, outcomes and, where apparent, the impact of rules and policies on

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*Recommendation: The Risk and Controls Committee (a sub-committee of the Central Governing Body) should be provided annually with data about concerns and complaints, including low-level concerns, and should conduct an audit to assess trends, timescale compliance, outcomes and impact.*

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pupils or a particular cohort of pupils. The data should include a separation of concerns into themes and a breakdown of which category of person has raised the concern (parent, teacher etc.) so that patterns and target areas of improvement can be identified.

- 12.9 I note that the Education (Independent School Standards) Regulations 2014 requires academy trusts to ensure that a copy of the Complaints Procedure and the number of complaints registered under the formal procedure during the preceding school year are made available to parents.<sup>12</sup> Under the regulations, this means either including the written procedure and complaint numbers on the school website or taking reasonable steps to ensure that that parents of pupils and

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*Recommendation: Ensure parents have access to the numbers of complaints registered under the formal procedure during the preceding school year.*

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prospective pupils are aware that the information is available. Whilst the Complaints Policy is available and linked to the schools' websites, I could find no evidence that parents were informed that complaints numbers were available, on request or otherwise. Each school should take appropriate steps to comply with Paragraphs 32(1)(b) and 32(3)(f) of the 2014 Regulations.

### **13. Anecdotal Reasons for not Engaging Properly with the Complaints Policy**

- 13.1 This is obviously a significant issue given the fact that many parents who expressed concerns to Hackney Council appear not to have formalised their concerns to the school in question.
- 13.2 I asked each contributor about their experience of the Complaints Policy and where relevant, why they had chosen not to use it. There were 20 or so contributors in this category including those who had commenced the process but chosen not to continue with it. The individual reasons for failing to engage were as follows:
- Lack of awareness of the procedure or uncertainty about the process
  - Partial resolution achieved with a phone call (MVPA)
  - Deciding there was no point due to imminent departure of pupil
  - Respecting wishes of pupil who feared repercussions (MVPA)
  - A sense of futility on the perceived basis that the school would be defensive or hostile (MCA) or inflexible (MVPA)
  - Discouraging email (with a particular impact on parents who may have their own support needs) (MVPA)
  - Frustration at lack of communication and response (MVPA)
  - Wanting to maintain a good relationship with the school (MVPA)
  - Fear of repercussions on child and being singled out (MVPA & MCA)
  - Perceived lack of confidential channels (MVPA)
  - Intimidating and inaccessible for parents who don't speak English (MCA)
  - Felt discouraged and that process was taking up too much time (MCA)
  - Couldn't cope due to family circumstances (MVPA)

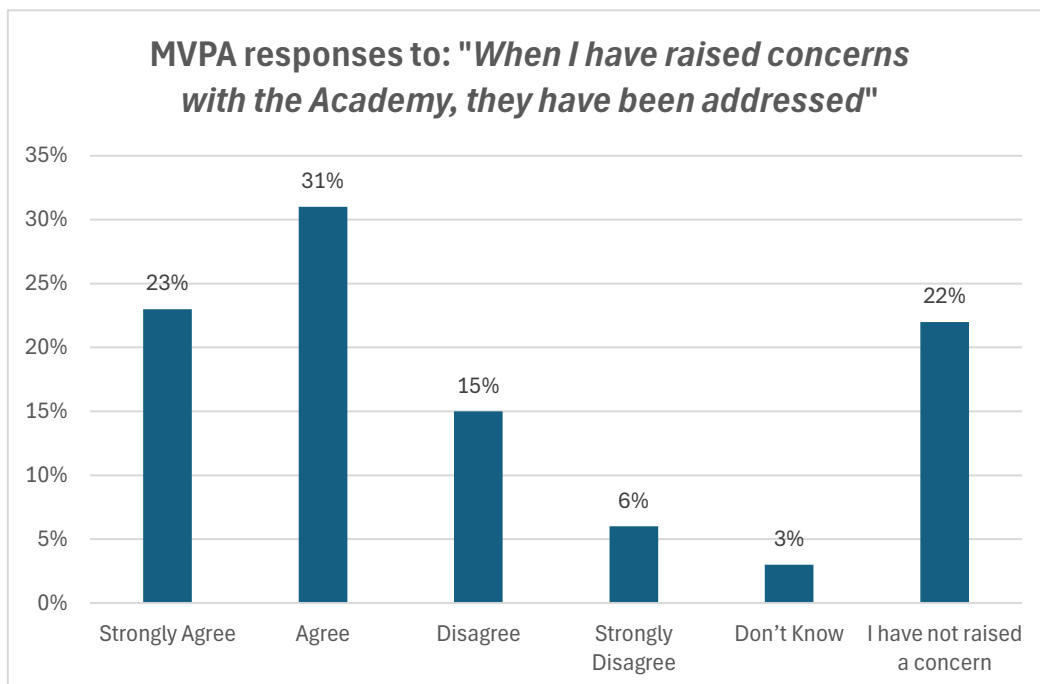
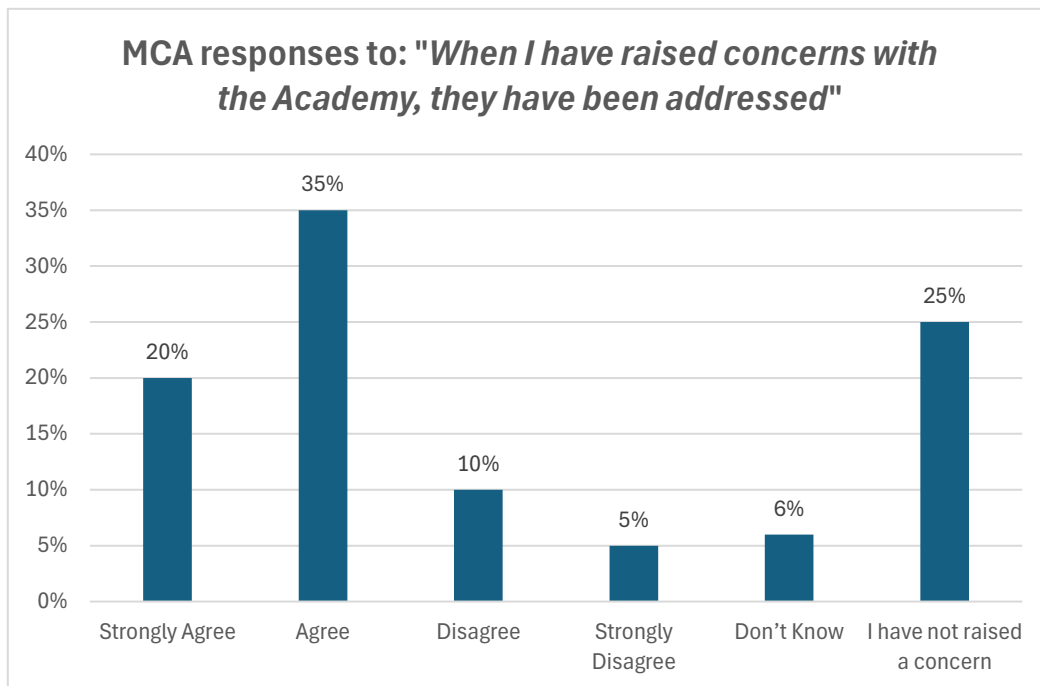
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<sup>12</sup> Part 6 Paragraph 32(1)(b) and 32(3)(f)

- Concerned about being banned from school premises (MVPA)
- Reluctant to discuss the issue with the very person whose actions had created the concern

13.3 In 2025 both MCA and MVPA conducted parental surveys which included the following proposition: *"When I have raised concerns with the academy, they have been addressed"*:

- (a) At MCA, of the 783 responses, 55% expressed agreement, 15% expressed disagreement, 6% didn't know and 25% had never raised a concern.
- (b) At MVPA of the 429 responses, 54% expressed agreement, 21% expressed disagreement, 3% didn't know and 22% had never raised a concern.



- 13.4 In other words, just over 1 in 2 parents agreed that concerns raised to the schools were addressed. The responses were therefore more favourable than unfavourable, but satisfaction and dissatisfaction had both increased in percentage terms from 2024.
- 13.5 My ability to judge the legitimacy of some of these reasons for not complaining is limited. For reasons of confidentiality, I could not ask the schools about the individual cases. Some of the stated reasons for not complaining were outside of the control of the school, such as a parent being too busy or preoccupied. When a parent wants to raise a concern but deliberately chooses not to, there is relatively little that an establishment can do about it. At least 4 contributors suggested that they didn't know where to find the Complaints Policy or how to make a complaint. On this front, the Mossbourne schools are doing precisely what they are required to, namely posting the Policy on the websites and enabling parents to speak to staff on reception about how to communicate a concern. It is relatively easy for a parent to find out about making a complaint.
- 13.6 13 contributors complained about the length of time it had taken for the schools to resolve a complaint (MCA 6, MVPA 4, MPA 1 and MRA 2).
- 13.7 I could not meaningfully explore whether the schools and in particular MCA and MVPA had dealt with formal complaints within the required timescales because the way in which they have historically recorded complaints data did not enable them to give me this information. MPA was able to confirm that since September 2024 it has managed all complaints within the required timescales and MRA indicated that whilst 2 issues were handled out of time due to school holidays, all other matters had been resolved on time. I have **recommended** that schools record time frames in their centralised data in order to monitor their own efficiency at handling complaints.
- 13.8 In a couple of cases, it was clear to me that potential complainants had genuinely felt deterred, by what they perceived as a refusal to allow another family member to assist where cultural or language barriers existed. On the strength of the evidence before me, this was a relatively isolated occurrence. The staff that I met with were aware of the difficulties that some parents might have with communications and could give examples of how they had provided assistance on this front.
- 13.9 When a parent suggested that they had not complained because they were worried about repercussions for their child, I tried to explore what they actually meant by that. My impression was that they feared that staff would unfairly impose sanctions on the pupil under the Pupil Behaviour Policy just because their parent had expressed a concern or complaint. As this issue remained theoretical, it is impossible for me to report meaningfully about it. I found no evidence to suggest that a pupil had been treated in this way as a result of their parent raising a concern.
- 13.10 A number of contributors told me that the limited methods of communicating with the school had either deterred them from complaining or having raised an issue, from continuing with it. I have dealt with this in more detail in the 'communication' section below at **Part C**, but have little hesitation in concluding that communication issues have contributed to a loss of confidence in the operation of the Complaints Policy. By this I mean:
- (a) Unnecessary barriers about *how* a complaint can be made (see paragraph **11.8** above).
  - (b) Congested telephone access to the schools making contact with staff more difficult and time consuming (see paragraph **18.6** below).
  - (c) Delays by staff in responding to requests for a conversation or meeting (see paragraphs **18.6 and 18.8** below).

- (d) Rigid focus in conversation on the fact of a rule at the expense of providing a fuller and more personalised response about why the rule needed to operate in a certain way with a particular pupil. Parents sometimes felt that this was a deliberately dismissive response to a genuine concern.
- (e) Over defensive initial response to a concern which discourages further communication about it.
- (f) General lack of teacher/parent relationships and communication.

13.11 Some of the concerns expressed to me by parents were not so much about the actual outcome following their expression of concern but by the quality and tone of response from a particular member of staff. I have dealt with this at paragraphs **14.14-14.21** below. There was a prevailing sense in meetings with parents that staff approached any query about an alleged breach of a rule in a simplistic way, namely by falling back on the existence of a rule and refusing to accommodate any alternative interpretation about its application. This issue was raised consistently by a sufficient number of parents for me to conclude that on occasions staff have been quick to dismiss parental concerns so that parents feel as though the outcome is preordained. This has negatively affected trust and confidence in raising concerns.

13.12 I turn now to the other policies, some of which can engage issues of complaints and safeguarding.

#### **14. The Pupil Behaviour Policy, Staff Code of Conduct & Whistleblowing**

14.1 My terms of reference require me to consider whether these policies comply with current statutory requirements. The 2014 Regulations require academy schools to draw up, implement and promote good behaviour through a behaviour policy which sets out sanctions to be used for pupil misbehaviour. Schools should also operate a staff behaviour policy (which in turn should contain or compliment a low-level concerns procedure and a whistleblowing policy).<sup>13</sup> The KCSIE guidance additionally suggests to schools that they should have these policies as well as a whistleblowing policy.

14.2 The Pupil Behaviour Policy, the Staff Code of Conduct and the Whistleblowing Policy are published on the school websites and comply with current legislative requirements and guidance.

14.3 I did not receive any information that suggested that the Staff Code of Conduct or Whistleblowing Policies were not working as they ought.

##### ***The Optics of the Pupil Behaviour Policy***

14.4 The primary school Positive Behaviour policy is naturally different from the secondary school policy and there was very little reference to its operation in MRA or MPA in my meetings. The focus of negative submissions concerned the application of the Pupil Behaviour Policy in MVPA and MCA and this is where I have directed my attention.

14.5 Mossbourne secondary schools place central and unapologetic emphasis on the Pupil Behaviour Policy and they apply it strictly. The schools explain this in advance to parents in detail at the enrolment/transition phase and warn them that the school may therefore not be an ideal choice if there are parental concerns about the strictures of the Policy. The parents of prospective pupils are provided with a copy of the Policy in advance of a pupil's arrival and are required to sign a copy to signal their acceptance of and commitment to the Policy. If the parents have read it and signed it in advance, they will be aware of the expectations that the schools place on pupils in this respect. The schools also make clear that they expect the parents to support the school in the

<sup>13</sup> I have already addressed the low-level concerns issues at paragraphs **10.9-10.12** above.



reasonable application of the Policy. The Policy is also set out in each student's planner booklet which parents are required to sign each week.

- 14.6 There was widespread support for this Policy in my meetings. Parents reported that they and their children felt that by having such a strict framework at school, everybody would know where they stood. Parents and staff told me that it helped pupils feel safe at school and when getting to and from home, and that it generally created a stable environment with minimal disruptive or anti-social behaviour. Some parents acknowledged that, with hindsight, they realised that such a Policy would suit one of their children but perhaps not another, and recognised that this would very much depend upon the characteristics and temperament of the child and upon their individual approach to learning.
- 14.7 A significant number of parents expressed disquiet at the way the Policy was applied in practice. At least 30 complained about what they saw as the adverse impact of the application of the Policy on pupil welfare. Some felt that punishment had been meted out unthinkingly and unfairly, causing avoidable upset. Numerous submissions complained that the school had failed to make allowances for a particular characteristic of the pupil, either arising from challenging circumstances at home or from a learning difficulty/health issue. In 7 instances, contributors reported to me that they considered the Policy had been used to indirectly discriminate against pupils on the grounds of race.
- 14.8 There was tension here between the expectations of the parents and the school. Some parents do not bother to read the Policy before signing it and are then disaffected when it is applied. It was obvious to me that the schools find this very frustrating. There was a pronounced difference of views about the way in which a particular rule, on a particular occasion, should apply to a pupil with a particular special need. Often, the parent felt that the school was demanding too much from the pupil and setting them up to fail, whilst the school felt it was reasonable to require the pupil to adhere to the rules, in part as preparation for independent life as a young adult. In such cases the school expected support from the parent.
- 14.9 Section 4 of the Pupil Behaviour Policy is titled: *"Taking Account of Individual Student Needs (Rigidity with Flexibility)"* and reads as follows:
- "4.1 Students may at some point require the adults in school to take account of their individual needs, protected characteristics, and/or circumstances when applying the Behaviour Policy. Staff have received training in, and are aware of, their obligations in relation to the Equality Act 2010. Students whose individual needs, protected characteristics and/or circumstances may need to be considered include but are not limited to:*
- *Students with disabilities;*
  - *LGBT students;*
  - *Students from ethnic minority backgrounds;*
  - *Students in religious groups;*
  - *Students who are travellers, asylum-seekers and/or refugees;*
  - *Students who need support to learn English as an additional language (EAL);* • *Students with Special Educational Needs (SEN);*
  - *Students looked after by the local authority (LAC);*
  - *Students formerly looked after by the local authority (PLAC);*
  - *Students with medical conditions;*

- *Young carers;*
- *Students from families under stress;*
- *Pregnant schoolgirls and teenage mothers;*
- *Students who qualify for the Pupil Premium Grant"*

- 14.10 Appendix 4 of the Policy goes on to give practical examples of where adjustments might reasonably be made.
- 14.11 The schools pointed out to me that they had adapted the Policy to reflect personal characteristics. One such example involved the Federation changing its rules around textured hair, following consultation with the parents and in order to better assist and include pupils of Afro-Caribbean heritage.
- 14.12 Most staff members explained that they felt the Policy was successfully adapted to pupils with special needs and that there were formal steps in place to identify the type of exemptions and reasonable adjustments required. This was done in detailed consultation where necessary with parents, teachers, Heads of Year, SLT and the Curriculum Support Department. These issues were formally recorded in a way that enabled every staff member to access them and make the necessary allowances. Adjustments made in individual cases included changes to uniform rules, allowing mobile phones, locating pupils in specific environments, making arrangements in the event of emotional or physical dysregulation in class, and not imposing suspension.
- 14.13 I asked the schools whether SEND pupils, or pupils qualifying for pupil premium or pupils with an EHCP were more likely to be sanctioned under the Policy. MCA thought that this might be correct but, like MVPA, did not have any data to assist with this. The SLT of the secondary schools did not feel that the Policy was unfairly applied and believed that decisions were taken in good faith on a pupil-by-pupil basis. The schools pointed to the very high attendance rate of such pupils and their impressive academic attainment. There was a partial acknowledgment that perhaps less experienced teachers or teachers from less regulated school environments might sometimes find it difficult to navigate the balance between the strict Policy and the individual circumstances of a particular pupil. If that is correct, it involves issues of teacher judgment and experience which I am not equipped to make recommendations about.
- 14.14 It was not uncommon for parents to tell me that their concern about the application of a particular rule had been compounded by what they saw as the secondary schools' inflexible approach to any discussion with the parent about it. Numerous examples were provided to me. My assurance of confidentiality to contributors prevents me from listing these examples and I have no way of determining whether their individual sense of grievance is justified because I have not heard the school's side of the story.
- 14.15 Approximately 30 parents complained that their attempt to discuss a behaviour or sanction with staff members was met with a blanket and somewhat dismissive response, namely (I paraphrase), *"That's the Mossbourne way – take it or leave it"*. This, they said, was usually accompanied by a categorical reference to the relevant rule under scrutiny and the implication that the matter should therefore be closed. In this context, the parents noted that whilst the schools liked to boast they operated *"rigidity with flexibility"*, the former invariably seemed to trump the latter.
- 14.16 There were sufficient separate and consistent accounts of this to suggest to me that the messaging around this central policy and quality of communications from staff to parents had not always been as constructive or explanatory as it could be. Whilst I could only explore this issue in general terms, it was something that I raised with the schools and the Federation because it seemed to me that it had eroded trust and confidence in the ability of parents to raise concerns

and complaints in a meaningful way about the application of the Pupil Behaviour Policy, in individual cases.

- 14.17 Each of the staff members I spoke with, including from the SLT, had direct experience of dealing with stage 1 complaints and some had lengthy experience of dealing with formal complaints at

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*Recommendation: Reflect on public statements made by SLT, CEO and designated senior members of Federation staff, bearing in mind that they are involved in determining formal complaints and need to provide parents with the confidence that any complaints they may raise will be meaningfully and fairly listened to.*

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the stage 2 and upwards stages. Most did not agree that parental concerns about the application of the Pupil Behaviour Policy were dealt with dismissively or without taking into account the particular circumstances of the pupils. Because I could not discuss individual cases with the schools, I had no practical way of exploring this further. I note that some members of staff did agree that the schools' and Federation's public emphasis on such a strict behavioural policy might appear overly dogmatic (my word) and dilute a parent's confidence in challenging the application of the Policy.

- 14.18 I discussed this issue of 'messaging' with the Federation, both around the Policy and the current bad press that the Policy has attracted. The Federation had reflected on this and recognised that its well-intentioned but unyielding emphasis on the Pupil Behaviour Policy coupled with its public

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*Recommendation: Provide staff with annual training in the importance of listening actively to parental concerns and communicating outcomes constructively and in sufficient detail.*

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statements about it could be seen as high-handed and may have affected levels of trust and confidence in the application of the Policy.

- 14.19 In summary then, the Policy itself is compliant with the relevant statutory framework. If parents have a perception that the Policy has been inappropriately applied on a specific occasion, that is not an issue that I can determine or make recommendations about. Some of current parental unease about raising concerns has probably been compounded by instances of teachers being too quick to dismiss such concerns. I note that certain steps are already being taken in this regard including taking advice from a CAMHS clinician about enabling staff to support others in emotional situations and providing guidance on active and reflective listening skills. MCA have for some time, through its pastoral department, run annual training sessions designed to emphasise listening skills when conducting parental meetings and to reflect a little more on what the parent might wish to bring to such a meeting. I recommend that such training is made available to staff who are involved in complaint resolution at other Mossbourne schools.

- 14.20 The trenchant public facing focus on the Pupil Behaviour Policy has, inadvertently, increased a sense of the secondary schools being unapproachable and it might have limited expectations of empathy. The Policy itself sets out in parts 2 and 3 what the schools are understandably trying to achieve by requiring such high standards from its pupils. It is possible that some parents might benefit from seeing this more prominently on the website rather than just in a policy that sits within a website link as it is currently easily overlooked. It might be helpful to explain in slightly less strident terms on the website and in other written communications what the schools are trying to achieve in an effort to increase understanding about this within the parental community.
- 14.21 The schools should provide staff with an annual reminder in training about the importance of

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*Recommendation: Remind staff of the importance of responding to contact requests from parents promptly and meaningfully.*

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responding promptly and meaningfully to parental concerns (whether stage 1, low-level or otherwise). I have considered whether there is a specific timescale that I should recommend the schools adopt for the process of responding to parental enquiries or concerns, short of formal complaints. It seemed to me that the infinite variety of such enquiries took this outside the scope of a workable recommendation and is instead an important issue for the Federation and schools to consider. The recommended reminder to staff should emphasise the additional importance of responding promptly to an expression of dissatisfaction including the need to provide a suitable explanation and of not seeming to be defensive or dismissive. Any response to a complaint or concern should be provided within the timescales set out in the Complaints Policy and should focus on the individual circumstances of the incident and pupil rather than simply treating the existence of a rule as conclusive.

## 15. The Governance Policy

- 15.1 The Academy Trust Handbook published by the DfE provides the framework for financial governance, management and the basic operation of academy trusts. My focus, when looking at the Handbook has been on safeguarding, behaviour and complaints. The Federation has complied with the requirements relating to these key areas where they feature in the Handbook. The Governance Policy itself has limited relevance to these key areas because they are contained elsewhere.

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*Recommendation: Consider how messaging about the Pupil Behaviour Policy might be softened and conveyed with greater emphasis on information and explanation. Explain in clear language but sufficient detail on the Federation and schools' websites the rationale for the Policy and its demonstrable positive benefits.*

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## C. Communications and Contact

### 16. Introduction

16.1 I received **52** submissions complaining about unclear lines of communication with schools and staff (6 of these were about MRA, 2 about MPA, 20 about MCA and 20 about MVPA).<sup>14</sup> There were a further 22 submissions referring to an unacceptable lack of access to school staff (3 about MRA, 10 about MCA, and 8 about MVPA).<sup>15</sup> It was necessary to explore these issues in more detail because parents indicated to me in meetings that this had negatively affected their experience of raising concerns and complaints and had, to an extent, reduced confidence in the effective management of those concerns.

16.2 This section covers four factors:

- (a) general level of contact between schools and parents;
- (b) the ability of parents to communicate with staff and the schools;
- (c) communications and messaging coming from the Federation and schools (partly dealt with in paragraph **14** above); and
- (d) shouting.

### 17. Level and Type of Communication

17.1 The scope for contact between parents and teachers is much greater at primary school. It was clear to me that ample opportunities for this existed at MRA and MPA such as:

- (a) Form teachers and members of the SLT including the Principal are present every day, morning and afternoon, at the school gates
- (b) A range of workshops and coffee mornings for parents
- (c) 'Meet the Teacher' communications and sessions
- (d) Sharing assemblies, 'Come Read with Me' and 'Come Dine with Me' events
- (e) Parental attendance in lessons to share stories
- (f) Parent Teacher Association Meetings
- (g) WAMHS surgeries (a wellbeing and mental health initiative in Hackney operating in schools to assist pupils and staff develop coping skills and various forms of resilience)
- (h) Parent and Open evenings
- (i) School performance and sports events
- (j) Cake bakes
- (k) School fete
- (l) Fairs such as Humanities Fair, Science Fair, Come and See Your Work Fair
- (m) Parent Gardening Group

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<sup>14</sup> 48 submissions referred to at least one Mossbourne academy. 6 submissions complained of unclear lines of communication but did not specify which academy the issue occurred at.

<sup>15</sup> 1 submission did not specify which academy the issue occurred at.

- 17.2 The Principal of MRA used to conduct parent surgeries every Wednesday but these were so under-used that they no longer take place.
- 17.3 I received anecdotal evidence that this high level of face-to-face contact at primary school tangibly built-up relationships and trust and assisted in queries and concerns being resolved informally and quickly. This, along with less serious behaviour issues and outcomes, may well explain why there was a higher level of satisfaction in the two primary schools about the way in which stage 1 complaints were quickly managed.
- 17.4 These higher levels of face-to-face contact are obviously much harder to achieve in secondary schools generally but especially in schools the size of MVPA and MCA.
- 17.5 Members of the SLT are on the school gate at MCA and MVPA twice daily along with other staff members but by year 7 most pupils are getting themselves to and from school and the daily possibility of teacher/parent contact ceases. This coincides often with a drive by secondary schools to increase pupil independence. By Year 7 the schools are trying to ensure that pupils take responsibility for the type of issues and communications that at primary school would ordinarily sit with the parents. It seemed to me from my meetings with staff from both secondary schools that the consequences of this reduced informal contact were easy to overlook and might create undesirable distance.
- 17.6 There are numerous school events and initiatives involving parents at MVPA and MCA including:
- (a) Transition evening
  - (b) Open evenings
  - (c) Parent Surgeries (though take up is inconsistent)
  - (d) Parent surveys, which are electronic and occur each year apart from years in which Ofsted inspects
  - (e) Musical and theatrical events
  - (f) WAMHS Tree of Life events
  - (g) Drop-in Coffee mornings
  - (h) Sports day
- 17.7 Despite this, it was apparent that some of the engaged parents I spoke with felt disconnected from the schools and uninvolved in their children's education. This, I think, has the potential to reduce trust and confidence and to cause a parent to hesitate before raising a concern. MCA and MVPA have more of a sense of this now and have started some initiatives to try and improve it. Teachers have been asked by the leadership to make sure that they telephone at least two parents a week to touch base and discuss the progress of their child. MCA does not hold parent/teacher surgeries but members of the SLT at MVPA have been given a free period per week to facilitate scheduled teacher to parent contact time. This is advertised on the website and reminders are provided throughout the year in letters and bulletins and newsletters. So far, the take up has not been significant despite reminders from the school.

## **18. Ability to Contact the Staff and the Schools**

- 18.1 It is important to note that all four schools have a policy that parents may not telephone or email teachers directly.<sup>16</sup> This issue was the subject of comment and frustration in several meetings with parents. Some felt that it increased the barriers to swift and effective resolution of concerns

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<sup>16</sup> There are more direct lines of communication between parents of pupils with SEND who are in direct contact with the SENCO.

because it was inevitably more cumbersome to contact the school reception and leave a message in the hope of getting a ring back. This increased the time and effort required, especially if the teacher was slow in responding or failed to call back.

- 18.2 Various reasons were provided to me by the school for their policy about this. They included:
- (a) Wellbeing – both in terms of managing the teachers’ workload and on occasion protecting staff from inappropriate communications
  - (b) Safeguarding - minimising the risk of unregulated teacher/pupil communication
  - (c) Diversion – it was felt that staff should focus on teaching and safeguarding
  - (d) Quality of communication – it was felt by MVPA and MCA that email is not the optimum method for dialogue and that a meeting or conversation was likely to be more effective
- 18.3 I found limited evidence of the schools explaining these rationales to the parent community. Providing this information in an accessible part of the websites would probably help parents understand the need to use other available forms of communication. A brief and informative message about this on the website, in the transition booklet and/or the planner might assist parents' understanding about the schools' communication systems and reduce frustration.

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*Recommendation: Explain to parents in clear language why schools have a policy that staff do not provide their phone numbers and do not communicate with parents by email, to avoid misunderstandings.*

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- 18.4 This policy has more pronounced consequences in the secondary schools because parent/teacher contact is necessarily so much more limited, as I have indicated. The less contact, the less of a relationship. Where there is less of a relationship, the parent and teacher are less likely to understand each other or collaborate when issues arise.
- 18.5 It follows that if parents cannot directly telephone or email teachers, there ought to be an efficient alternative system of communication in place. I therefore explored this issue with the Federation and all four schools.
- 18.6 Each school employs administrative staff to handle telephone enquiries. Both MCA and MVPA can take up to two phone calls at a time. Calls about admissions and attendance are filtered separately. When a parent calls to speak to a particular teacher, they are usually informed that their message will be passed on because very often the parent will call when the teacher is teaching. The teacher or staff member is expected to call them back as promptly as possible. Some teachers are better than others in calling back. The four schools recognised that this system had the potential to cause communication barriers and understood parental frustration about it. Parents can struggle to get through as the lines are engaged and some feel as though they are the ones constantly chasing during what is already a busy day. Some calls are time critical but are not responded to in good time, or worse, not responded to at all. That said, I was informed by administrative staff that some parents persist with calls about issues that are not remotely time critical or could have been avoided altogether had the parent checked the pupil’s school planner. Congested phone lines did feature as a source of frustration in some of the meetings with parents and were occasionally cited as a barrier to raising concerns or persisting with them.
- 18.7 Each of the schools has a generic ‘enquiries’ email, although MVPA asks parents not to use it (see paragraph 18.9 below). Emails sent to this generic address are supposed to be triaged by the administrative staff with a view to ensuring that the relevant teacher receives the request and



contacts the parent as quickly as possible. This should, in theory, be an important way for parents to communicate concerns with the schools and to raise Stage 1 complaints.

18.8 As with telephone messages, there was some parental frustration about the email system in the sense that there were delays in receiving a meaningful reply and occasionally teachers failed to get in touch at all.

18.9 The 'Get in touch' section of MVPA's website starts by setting out the school telephone number, the enquiries email and the postal address. Directly underneath this it reads:

*"For existing Parents and Carers*

*A reminder that teaching staff do not communicate with parents/carers via email and that the 'MVPAEnquiries' email address is for external agencies, so should not be used by existing parents/carers as in most cases you will not get a response."*

18.10 I asked the leadership of the school and Federation about this. Their position was that experience had showed that email was not a particularly successful method of communicating information or concerns and that usually issues were more clearly expressed and quickly resolved by telephone contact instead. Some parents do in fact use the 'enquiries' email and when they do, the school administrative staff respond accordingly.

18.11 Whether intentional or not, this has the potential to send an instantly negative and aloof impression. The website informs parents that they should contact reception by telephone but the general tone, on one view, is less than approachable. It is difficult to understand the justification in 2025 of instructing parents that they should not email the school that their child attends, particularly when parents are not allowed to contact teachers directly. It is an unusual and unnecessary barrier. It has contributed to a sense of parental exclusion and rightly or wrongly, it has deterred some parents from feeling as though they can raise concerns and complaints in a meaningful way.

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*Recommendation: Enable parents to communicate with the schools via a generic enquiries email, if that is not already happening, and explore options of telephone call handling if financial considerations permit.*

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18.12 I note, in this context, that when MCA and MVPA surveyed parents this year, both schools indicated that, having analysed the responses, they recognised the need to remind parents regularly how best to contact staff at the school.

18.13 Both MCA and MVPA confirmed that if a parent wished to speak with their child's form tutor, subject teacher or Head of Year they should make a request via the school reception or put a note in the pupil's student planner. The planner is a physical notebook, containing lots of practical useful information for students. It acts as a diary for lessons and homework and other school activities and pupils are required to bring it into school every day. Achievements, awards and sanctions are recorded in it. More than one teacher looks at each planner daily and parents are asked to sign it on a weekly basis. There is a designated space within each weekly section for the teacher and the parent to leave a comment for each other. Pupils who might struggle to use the planner due to learning or health difficulties have a home academy diary which is handed physically to parents.

- 18.14 I asked MCA how parents would know how to contact their child's form tutor, subject teacher or Head of Year and was informed "*Year 6 Parents Evening and the Transition Booklet*". The transition booklet does contain a section about communications. It instructs parents to contact the form tutor with any day to enquiries by using the planner and it informs parents that the Head of Year and form tutors will communicate with parents where needed about academic progress, behaviour, attendance and punctuality. There are no specific signposts about contacting staff that I could see. There is very little information on teachers' names or positions beyond the SLT and designated safeguarding leads.
- 18.15 There is also an online system in both MCA and MVPA called 'Progress Teaching'. Parents access it by inputting a username and password. It stores all transition information, student reports and letters that have been sent to parents. It contains the pupil's timetable and identifies the teachers and subjects of the pupil. MVPA informed me that once a year a letter is sent via this system to parents called '*How to Communicate with the Academy*' reminding them of various ways in which to contact the school.
- 18.16 In summary, there are various ways in which a parent can contact the school and specific members of staff. The use of email has been unnecessarily limited at MVPA and the schools accept that parental frustration about congested phone lines is justified at times. The planner is a quick and easy method of communication that is overlooked by some parents. These communication issues have the potential to increase rather decrease the space between staff and parents.
- 18.17 I recommend that more detailed information is provided to parents on a regular basis about how they can contact the school, including who they should contact depending on the nature of their query. Consider including some of this information in the school planner, as well as via other means, such as the website, newsletters, bulletins. This information should be updated regularly. Remind parents in positive language of the importance of the school's expectation that they use the school planner to request contact and to convey concerns and issues.

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*Recommendation: Provide more detailed information on a regular basis to parents about how they can contact the school, including more detailed guidance on who to contact depending on the nature of the query.*

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- 18.18 The names and roles of more staff should also be listed on the school websites, including Heads of Year and form teachers.

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*Recommendation: List the names and roles of more staff on the school websites, including Heads of Year and form teachers.*

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## **19. Messaging and News from the Schools**

- 19.1 One way of trying to stay connected with the parental community and therefore maintain good levels of trust and confidence, is the regular provision of information about school life, if funds permit.

- 19.2 This was an issue raised by a few parents with children at the secondary schools. I think there was a sense that in all the focus on discipline and behaviour, it was easy to lose sight of positive achievements and fun. As I have already indicated, some information about school life and events is imparted on Progress Teaching. There are also newsletters. In the 2025 parent survey, out of 429 responses at MVPA, 89% felt that the school kept them updated on how their child was doing. At MCA, out of 783 responses, 86% felt the same. Having analysed the overall response to the 2025 parental survey, MCA and MVPA pledged to communicate more with parents about daily life at the school. The issue, therefore, was not a failure to inform parents about the progress of a particular pupil but rather a lack of collegiate and positive messaging generally.
- 19.3 This chimed with a few submissions from parents who felt that they were not included in the fabric of the school, although I had no way of gauging how representative their views were. Both schools now publish a fortnightly bulletin keeping parents up to date about events and achievements with a focus on positive news. Staff have been reminded to make more of pupil achievements and to publicise student rewards more. It was clear from my meetings that the Federation is aware, as are the secondary schools, that a higher level of communication and parental inclusion would be desirable. One consideration for the schools is budgetary. Spending more time and money on such communications with parents takes precious and already stretched resources away from educating the pupils. The schools are aware that a balance needs to be struck, and continuing thought is being given to getting this balance right. This is to be welcomed and will no doubt help connect the parents to the school and staff.

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*Recommendation: Provide parents with regular information about school life and events so they feel more engaged in the fabric of the school, if that is not already happening.*

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## **20. Raised Voices/Shouting**

- 20.1 In total 18 contributors conveyed a sense of concern about instances of staff shouting at pupils (3 former pupils, 3 staff and 12 parents). One contribution concerned MRA but the remainder were about MCA and MVPA.
- 20.2 The reason for including this in my review is because of the submissions made that inappropriate shouting has been condoned by staff members, which would make it less likely that anyone would feel able to raise a concern about it.
- 20.3 I was therefore interested to see what the Staff Code of Conduct said about this. In fact, it does not contain a specific reference to voice levels or to the circumstances in which the use of a raised voice might be permissible, presumably because of the subjective considerations and varied factual possibilities. Teachers are instructed about this at the teacher training stage. They are then left to develop their own personal style and communication skills. The Staff Code of Conduct does require staff to maintain professional boundaries when communicating with pupils and with adults and always to communicate in an appropriate way. Belittling language, therefore, would never be acceptable in terms of professional standards, whether delivered in a raised voice or not.
- 20.4 In many cases, it was impossible for me to gauge the accuracy of the concerns raised by individual contributors about shouting. A handful of parents told me they had witnessed shouting in circumstances that had left them feeling uncomfortable and worried about what it said about the environment of the school, though I note they had not complained about it. Others were reporting what a pupil had said and again had not complained. In those cases, I was mindful, as in others, that one person's notion of 'shouting' can be another person's use of a clear, firm tone.

- 20.5 At least 5 staff members agreed that shouting occurred at the secondary schools but they expressed different views about whether what they had witnessed was appropriate. I note that none had raised a low-level concern or felt the need to use the Whistleblower Policy. They considered that teachers naturally had to raise their voices in any school when trying to obtain the attention of collective numbers of pupils, and when monitoring them between lessons. At least one staff member who did feel that there had been unnecessary or belittling shouting directed at an individual pupil, considered that this was an institutional issue, tolerated by the extended leadership because it was felt that it helped to instil discipline across the board.
- 20.6 I asked the leadership of MVPA and MCA about this and in particular about the press reports of inappropriate shouting at pupils or the use of belittling language towards them. They did not agree that this had been occurring and felt that if it had, they would know about it. They recognised that especially during the morning ‘line up’, it is necessary for teachers to raise their voices to marshal pupils and to be heard but that this was commonplace in schools, as was the need to direct pupils firmly during lesson transitions. The leadership expressed understandable frustration about not being able to investigate the specifics of a particular incident where the parents in question had failed to complain about it.
- 20.7 My conclusions about the suggestion of inappropriate shouting are as follows. From the submissions to this review, the issue does not appear to have been raised with the schools in the appropriate way by the parents of the affected pupils or by any concerned member of staff. It is therefore difficult to investigate or properly assess concerns about it. Whilst I cannot judge any one incident, I was provided with sufficiently consistent information to enable me to conclude that there had been some instances of unnecessary shouting towards pupils. If the senior leadership of the schools are not aware of this, they should be. There was nothing to suggest that any instances of shouting had caused a lack of confidence in the Complaints Procedure.
- 20.8 Teachers must have a wide margin of discretion about this and use their best judgment. In that sense, no policy can cater for this. However, some guidance in the Staff Code of Conduct would remind teachers about the need to respect boundaries and would provide parents with some sort of benchmark if they have a concern about it.

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*Recommendation: Add guidance to the Staff Code of Conduct on the appropriate use of raised voices.*

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## Appendix A: List of Key Legislation and Guidance

- The Children Act 2004
- The Education and Skills Act 2008
- The Education (Independent School Standards) Regulations 2014/3283
- The Academies Act 2010
- The Children and Social Work Act 2017
- The Equality Act 2010
- Statutory Guidance 'Keeping Children Safe in Education', 2024
- Statutory Guidance 'Working Together to Safeguard Children', 2023 (updated 2025)
- Statutory Guidance 'Behaviour in Schools – Advice for headteachers and school staff', 2024
- Statutory Guidance 'Mental Health and Behaviour in Schools', 2014 (updated 2018)
- Statutory Guidance 'Special Education Needs and Disability Code of Practice', 2015 (updated 2024)
- Statutory Guidance 'Best Practice Guidance for Academies Complaints Procedures', 2021
- Statutory Guidance 'Academy Trust Governance Guide', 2025
- Statutory Guidance 'Supporting Pupils at School with Medical Conditions', 2015
- Statutory Guidance 'Teachers' Standards: Guidance for school leaders, school staff and governing bodies', 2011 (updated 2021)
- Statutory Guidance, 'What academies and further education colleges must or should publish online', 2016 (updated 2024)
- Academy Trust Handbook, 2024

## Appendix B: Statement from Anne Whyte KC

13 May 2025

### Independent Review into Mossbourne Academy Schools

Dear all,

My name is Anne Whyte, and I have been commissioned to review the way in which complaints processes and safeguarding procedures have been operating within the Mossbourne Academy Schools.

You will know there has been recent publicity about complaints made by some parents about staff behaviour and pupil welfare at Mossbourne Victoria Park Academy. My task is to try and understand how Mossbourne Academies, specifically Mossbourne Victoria Park Academy, Mossbourne Community Academy, Mossbourne Riverside Academy and Mossbourne Parkside Academy, have been managing complaints, what might be done to improve their processes, and increase public confidence in the way the Mossbourne Academies manage complaints and safeguarding concerns. The Review will examine the period from September 2023 to the present. I understand that the Mossbourne Federation took over the management of three schools in Thurrock in January 2025. As these schools have only been under the Federation's management for around 4 months, I have decided to focus my attention on the Hackney Mossbourne Academy schools.

By way of introduction, I have been a barrister for over 30 years, and I am also a part time judge. I have experience in conducting independent reviews and dealing with vulnerable individuals who find themselves caught up in legal processes. Some of you may recognise my name from a recent wide ranging independent review into the way complaints were handled in the sport of gymnastics. My review into the Mossbourne Academies will also be an independent one. I will write a report about my findings and recommendations for the Mossbourne Federation's Trustees to reflect upon. It is anticipated that my report may also be shared confidentially with the Department for Education and the Local Authority. I will be assisted by a similarly independent team of solicitors at Fieldfisher who have expertise in setting up and supporting independent reviews. The Mossbourne Federation Members have set up a separate sub-committee made up of Daniel Flitterman, Tareic Alphonse and Shede Javadzadeh. They are instructing me and I will report my findings to them. The Mossbourne Federation, and the sub-committee instructing me, will not have any influence over the findings I may make in my review.

I am making this statement to encourage anyone directly affected by complaints handling within one of the Mossbourne Academies named above from **September 2023** onwards to get in touch and to tell me about their experiences. I really do want to hear from you. No-one at the school or in the sub-committee will have access to any information which is shared with me in confidence. The work of my review will also be entirely separate from the current Local Child Safeguarding Practice Review being conducted by the City and Hackney Safeguarding Children Partnership.

I would like as many affected people as possible to get in touch with me through the confidential form set out below. That includes parents, carers, students and staff at the schools from September 2023 to the present. Any information that you provide will be treated in confidence. It will only be seen by myself and the solicitors helping me from the law firm Fieldfisher.<sup>17</sup> Your names and the names of people you mention,

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<sup>17</sup> Fieldfisher (ICO Registration Z9475189) and I (ICO Registration Z4629438) will act as data controllers for the purposes of the UK General Data Protection Regulation (GDPR). Any personal data we collect will only be used for the purposes of the review and will be stored securely for its duration and for a reasonable period afterwards to comply with our legal obligations and ensure the integrity of the review.

and any identifying information, will not be published in my report and your information will not be shared, in line with data protection law.

However, I must warn you that if you provide information to the Review that raises immediate safeguarding concerns or issues of a criminal nature, we may be required to share this information with the relevant authority. This is about keeping you and other people safe. For students, we encourage you to speak to an adult you trust if you feel unsafe or need support in any way. There are also additional resources listed at the end of this letter.

It is important to understand that it is not my role to judge the merits of any complaint, and I am not here to pass an opinion on the rules imposed by schools. My role is to look at whether the complaints processes and safeguarding procedures are fit for purpose and whether they should be changed or improved. If I decide that people with a sense of complaint have chosen not to use the Academies' complaints processes, then my role is to understand why that has happened and what can be done to improve the processes for the benefit of everyone.

I would like to get to work quickly. The deadline for sending through any submissions is **Tuesday 27 May**. I am mainly interested in finding out how the complaints processes have been working or not working. **If you have made a complaint or raised a safeguarding concern to Mossbourne Victoria Park Academy, Mossbourne Community Academy, Mossbourne Riverside Academy or Mossbourne Parkside Academy, what was your experience, and do you think it was dealt with appropriately?** I am also very interested to learn more about levels of trust and confidence in the ability and willingness of the Academies to handle complaints and to ensure that they are resolved appropriately. If you had a complaint but chose not to engage with a complaints procedure, why was that? There is an online form which you can use to provide this sort of information which is accessible here: <https://forms.office.com/e/g2uRC67e1F>.

Once I have had time to read your submissions, I would like to have the opportunity to meet as many people as possible who would like to see me face to face. To that end, I will be available for confidential meetings to discuss your experiences in more detail at a venue in Hackney in late May/early June. This will be a safe and confidential space for you to tell me about your experiences if you would like to. Further information on how to book a meeting will follow. Please indicate in your submission if you would like to meet and the Fieldfisher team will be in touch with you to arrange a time.

Yours faithfully,

Anne Whyte KC



**Additional resources for students:**

- Contact **Childline** free by phone (**0800 1111**) 1-2-1 chat, email or Sign Video. Call **The Samaritans (116 123)**.
- Contact Hackney Social Care, who can be contacted directly in working hours (020 8356 5500) or out of hours (020 8356 2170) (if you live in another borough) find the contact details for your home local authority's social care details which are always displayed on their website.
- National Sexual Health helpline (0300 123 7123)
- CHYPSplus ([www.chypsplus.nhs.uk](http://www.chypsplus.nhs.uk)) is a health service for anyone between the ages of eleven to nineteen.
- [www.Kooth.com](http://www.Kooth.com) for online mental wellbeing community

## Appendix C: Background to this Review

On 3 April 2025, I was commissioned to conduct an independent review into the current complaints and safeguarding policies and procedures at four academy schools within the Mossbourne Federation (the "**Federation**"). The schools are all situated in Hackney.

The request was made on behalf of the Mossbourne Members' Trust, acting distinctly from the Central Federation Board, the governors, executive or staff of the Federation and individual academies. I was asked to report directly to a sub-committee formed specifically for the purpose of the review. The sub-committee consisted of the following individuals: Daniel Flitterman, a member of the Mossbourne Federation, Tareic Alphonse, a local resident who sits on the governing body of Mossbourne Community Academy, and Shede Javadzadeh, a former student and board member of the Mossbourne Charitable Trust.

The circumstances in which the request was made are as follows:

Mossbourne Federation is a multi-academy trust, comprising seven academies, including Mossbourne Victoria Park Academy ("**MVPA**"),

In or around February 2024 Hackney Council received a dossier outlining some 30 concerns regarding the behaviour of certain staff towards pupils at MVPA. The dossier had been co-ordinated by a parent who was dissatisfied with the way in which the school had approached his concerns about his child's attendance and education at MVPA. The concerns in the dossier, which were at that time anonymous, included suggestions of bullying, harassment, intimidation, shouting, public humiliation and verbal abuse. The dossier was also seen by the City and Hackney Safeguarding Children Partnership ("**CHSCP**") and the Department for Education ("**DfE**"). The complaints were apparently made by parents, teachers, and pupils (past and present). This first dossier was provided to the Mossbourne Federation and reviewed. It was possible to cross refer some of the issues raised against records held by MVPA, notwithstanding anonymisation. In those specific cases, it was found that the complainant in question had not used or followed the Mossbourne Complaints Policy. Some of the complaints suggested that there was a direct and adverse correlation between MVPA's strict enforcement of its Behaviour Policy and pupils' welfare and alleged decline in mental health. There were apparently also concerns about inadequate support for students with mental health issues, with reports of teachers ridiculing or dismissing their concerns. The school has been accused of failing to consider students' individual needs, particularly those with Special Educational Needs or disabilities, mental health issues, or challenging circumstances.

It is my understanding that the CHSCP encouraged complainants to follow MVPA's complaints procedures and where appropriate escalate issues to Ofsted, the DfE and/or Local Authority Designated Officer during this time. It would appear as though this was not done in the main. Matters remained unresolved by the summer of 2024.

In November 2024 the CHSCP received a further dossier containing multiple 'complaints', coordinated by the same parent who by this time had created a campaign group called 'Educating Hackney'. The second dossier, which contained a much larger number of complaints, made reference to other Federation schools, not just MVPA. Some of those contributing to the dossiers expressed a willingness to speak with the Council about their concerns, others wished to remain anonymous. The DfE provided the Federation with a thematic summary of the content of the dossier. The themes included:

- Negative impact on pupil mental health being caused by staff mistreatment (such as shouting, using degrading or humiliating language) with resulting isolation of pupils and decline in attendance

- Restrictive Behaviour Policy adversely and disproportionately affecting neurodiverse pupils and pupils with SEND
- Generation of a culture of fear at MVPA
- Unnecessarily restrictive attitude towards access to toilets
- Racism in context of application of the school behaviour policy and shouting at pupils
- Bullying of teachers by senior teachers

Following this and after consultation with its safeguarding partners, the CHSCP instigated a Local Child Safeguarding Practice Review ("LCSPR") on 11 December 2024. This is a statutory review, and the independent reviewer is Sir Alan Wood. The terms of reference of the review are publicly available. The focus of the review, currently, is upon MVPA. It will determine whether the concerns and reports that it has received can be substantiated by examining a discrete cohort of them thematically. It will then identify any lessons concerning the application of behaviour policies and the way in which they impact students, families, staff and the wider school community.

On 7 February 2025 the CHSCP informed the Federation in correspondence that whilst many of the accounts alleged ill-treatment of pupils, none indicated that a child was at any immediate risk of significant harm or that urgent action was required in respect of an identified member of staff.

The important work of the statutory LCSPR review continues. Whilst it set itself a provisional deadline of six months, at the time I was requested to conduct a separate review, there was no fixed timescale for when the LCSPR would be able to report its findings. I understand, at the time of writing, that Sir Alan Wood's review may conclude in the early autumn of 2025. The Members' Trust was concerned about the implication of so many individuals with an apparent sense of grievance about individual schools (not just MVPA) choosing, deliberately, to circumvent the school's own procedures and to approach the local authority or press instead. The Trust was also keen to act on the recommendation of the DfE to conduct its own review. Whilst the reasons for this were neither clear nor communicated to Mossbourne, the Trust was concerned to act quickly and take any necessary steps to try and increase public confidence in the application of its own internal procedures. In those circumstances, I was asked to analyse the policies and identify steps that could be taken to encourage more parents in the future to use them.

## Appendix D: Recommendations

### *Complaints*

#### **1. Make the Complaints Policy more accessible and visible.**

- The Safeguarding Policy and Complaints Policy should be aligned and, along with the Federation and schools' websites, should provide clearer guidance to parents on how to report concerns or complaints about staff conduct towards a pupil affecting welfare or wellbeing or in a safeguarding or SEND context, and what policy should be used (see paragraph **10.8**).
- Give the low-level concerns procedure greater prominence in the Safeguarding Policy, Complaints Policy and the Staff Code of Conduct, setting out further detail on its operation and making it clear that it applies to parents, pupils and staff (see paragraph **10.12**). Each document should explain in the main text (as opposed to in a signposted appendix) how a low-level concern differs from other types of concern. More information should be provided about the various ways in which the low level concern might be managed.
- Provide a one-page graphic in the Complaints Policy to signpost potential complainants to the available processes (see paragraph **11.5**).
- Indicate more prominently in the Complaints Policy that a complainant may bring someone with them to a meeting to assist with communications (see paragraph **11.5**).
- The Complaints Policy and school websites should distinguish between a complaint and concern, explain that either a complaint or a concern can be raised in any way or via a third party who has obtained consent to act on the complainant's behalf, and provide an email address for complaints (see paragraph **11.8**).

#### **2. Improve complaint recording and tracking.**

- Ensure all complaints and expressions of concern/dissatisfaction are recorded on a central digital tracker and track progress through the complaints stages. Further data, such as the nature of the complaint and staff member involved, should be recorded to ensure trends can be identified (see paragraph **12.7**).
- Reinforce the mandatory and discretionary duties set out in the statutory guidance 'Special Education Needs and Disability Code of Practice' and 'Supporting Pupils at Schools with Medical Conditions' (see paragraph **12.7**).
- The Risk and Controls Committee (a sub-committee of the Central Governing Body) should be provided annually with data about concerns and complaints, including low-level concerns, and should conduct an audit to assess trends, timescale compliance, outcomes and impact (see paragraph **12.8**).

- Ensure parents have access to the numbers of complaints registered under the formal procedure during the preceding school year (see paragraph **12.9**).<sup>18</sup>

### *Communication*

#### **3. Strengthen staff training on communication.**

- Provide staff with annual training in the importance of listening actively to parental concerns and communicating outcomes constructively and in sufficient detail (see paragraph **14.19**).
- Add guidance to the Staff Code of Conduct on the appropriate use of raised voices (see paragraph **20.8**).

#### **4. Improve communication channels with parents including enabling email enquiries and improved call handling.**

- Remind staff of the importance of responding to contact requests from parents as quickly as is reasonably practicable (see paragraph **14.21**).
- Enable parents to communicate with the schools via a generic enquiries email, if that is not already happening, and explore options of telephone call handling if financial considerations permit (see paragraph **18.11**).

#### **5. Provide more clarity about the parent/staff communication policy and use communications to increase transparency about school life.**

- Explain to parents in clear language why schools have a policy that staff do not provide their phone numbers and do not communicate with parents by email, to avoid misunderstandings (see paragraph **18.3**).
- Provide more detailed information on a regular basis to parents about how they can contact the school, including more detailed guidance on who to contact depending on the nature of the query (see paragraph **18.17**).
- List the names and roles of more staff on the school websites, including Heads of Year and form teachers (see paragraph **18.18**).
- Provide parents with regular information about school life and events so they feel more engaged in the fabric of the school, if that is not already happening (see paragraph **19.3**).

#### **6. Ensure public messaging from the schools and Federation (including messaging around the Pupil Behaviour Policy and Complaints Policy) reflects a culture of openness and fairness.**

- Consider how messaging about the Pupil Behaviour Policy might be softened and conveyed with greater emphasis on information and explanation. Explain in clear language but sufficient detail on the Federation and schools' websites the rationale for the Policy and its demonstrable positive benefits (see paragraph **14.21**).

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<sup>18</sup> As required by paragraphs 32(1)(b) and 32(3)(f) of the Education (Independent School Standards) Regulations 2014

- Reflect on public statements made by SLT, CEO and designated senior members of Federation staff, bearing in mind that they are involved in determining formal complaints and need to provide parents with the confidence that any complaints they may raise will be meaningfully and fairly listened to (see paragraph **14.18**).

## Appendix E: Governance Structure

