



GIGGLESWICK SCHOOL

Anti-Bullying Policy (including other forms of Child-on-Child Abuse)

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STATEMENT OF INTENT

Giggleswick School ("the School") is committed to providing a caring, supportive and safe environment for all pupils so they can learn and thrive in a place where fairness and respect are valued and prejudice is challenged. There is a very clear emphasis on kindness, inclusion, understanding and the celebration of difference.

Every pupil should feel safe to learn and be safe from victimisation and discrimination in class or outside, in the houses and on activities and trips. If bullying does occur, pupils are encouraged to have the courage to speak up to a member of staff including, but not limited to, their House Staff, Resident Tutors, Matron, Tutor, the School Nurse, School counsellor, or a senior member of staff such as the Second Master, DSL or DDSLs. To encourage this, we strive for every incident to be dealt with sensitively but thoroughly either via a restorative process or if necessary, through a disciplinary process.

This policy seeks to:

- Prevent bullying at the School;
- Ensure all pupils, staff and parents understand what bullying is;
- Deal with bullying occurrences, swiftly and effectively;
- Support the victims of bullying and their families;
- Raise awareness of bullying amongst staff through training;
- Comply with the school's duties under the Equality Act 2010;
- Comply with the KCSIE 2025 recommendations on child-on-child abuse; and
- Meet the requirements under Standard 16 of the Boarding Schools National Minimum Standards 2022.

This policy should be read in conjunction with the School's Safeguarding Policy and Procedures, Behaviour, Rewards and Sanctions Policy and School Rules, Online Safety Policy, PSHE Policy, and RSE Policy.

The School does not consider abuse should ever be tolerated or passed off as 'banter' or 'part of growing up' as this can lead to a culture of unacceptable behaviours, and an unsafe environment for children, and in worst case scenarios, a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

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1 CHILD-ON-CHILD ABUSE

1.1 DEFINITION

KCSIE 2025 states that all staff should be aware that children can abuse other children (often referred to as child-on-child abuse). This can happen both inside and outside of school or online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- Abuse in intimate personal relationships between children (also known as teenage relationship abuse);
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- Sexual violence, such as rape, assault by penetration and sexual assault;
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment;
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery);
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- Upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and
- Initiation/hazing type violence and rituals.

Staff have an important role to play in preventing abuse and responding where they believe a child may be at risk from abuse. Staff should maintain an attitude of **'it could happen here'**, and if they are concerned about the welfare of a child, they should always act in the best interests of the child. Concerns should be acted upon immediately, and following the School's Safeguarding Policy, they should speak to the School's Designated Safeguarding Leads (DSL), or in their absence, a Deputy DSL.

1.2 HOW A CHILD WHO IS BEING ABUSED BY OTHER CHILDREN MIGHT BE IDENTIFIED

All staff should be alert to the wellbeing of pupils and to signs of abuse, and should engage with these signs, as appropriate, to determine whether they are caused by child-on-child abuse. However, staff should be mindful of the fact that the way(s) in which children will disclose or present with behaviour(s) as a result of their experiences will differ. Signs that a child may be suffering from child-on-child abuse can also overlap with those indicating other types of abuse. For these, please refer to the School's Safeguarding Policy and Procedures.

Signs can include:

- Failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard ordinarily expected.
- Physical injuries.
- Experiencing difficulties with mental health and/or emotional wellbeing.
- Becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic attacks; suffering from nightmares or lack of sleep or sleeping too much; frequent visits to Wellbeing Centre/school nurse.
- Broader changes in behaviour including alcohol or substance misuse.
- Changes in appearance and/or starting to act in a way that is not appropriate for the child's age.
- Abusive behaviour towards others.

The above list is by no means exhaustive and the presence of one or more of these signs does not necessarily indicate abuse.

Staff must be aware that children may not tell them about their abuse, but staff may overhear a conversation or notice changes in a child's behaviour that may be indicators of abuse.

All allegations of child-on-child abuse will be treated as a safeguarding concern. Concerns will be investigated and managed in accordance with the School's safeguarding procedures. The School has specific procedures in response to reports of sexual violence and sexual harassment, as detailed in the School's Safeguarding Policy and Procedures.

1.3 HOW THE SCHOOL WILL RAISE AWARENESS OF AND PREVENT CHILD-ON-CHILD ABUSE

The School actively seeks to develop awareness of and prevent all forms of child-on-child abuse by:

- Creating a culture in which our pupils feel able to share their concerns openly, in a non-judgmental environment.
- Creating conditions in which our pupils can aspire to and realise safe and healthy relationships.
- Encouraging a culture of inclusion and respect, which is faithful to the core values of the School.
- Educating children about the nature and prevalence of child-on-child abuse, sexual violence, sexual harassment and consent via the PSHE programme, and the wider curriculum.
- Educating all Governors, Senior Leadership Team, staff and volunteers, pupils, and parents about this issue.
- Training all Governors, Senior Leadership Team, staff and volunteers on the nature, prevalence and effect of child-on-child abuse, and how to prevent, identify and respond to it.
- Taking seriously all forms of child-on-child abuse (no matter how low level they may appear) and ensuring that no form of child-on-child abuse is ever dismissed as 'banter'
- Responding to cases of child-on-child abuse promptly and appropriately.
- Ensuring that all child-on-child abuse issues are fed back to the School's DSL and logged so that they can spot and address any concerning trends and identify pupils who may be in need of additional support.

2 BULLYING

The School is committed to eradicating bullying by acting firmly whenever evidence of bullying is found. This policy takes account of current legislations and guidance including:

- Children Act 1989
- Equality Act 2010
- Education and Inspections Act 2006
- *Preventing and Tackling Bullying* (July 2017)
- *Keeping Children Safe in Education* (2025)
- *Working Together to Safeguard Children* (2023)
- DCSF's *Safe to Learn: Embedding anti-bullying work in schools*

2.1 DEFINING BULLYING

There is no legal definition of bullying. However, all members of the School community must understand bullying to be:

"behaviour by an individual or group, repeated over time, that intentionally hurts, threatens or frightens another individual or group either physically or emotionally. It is unkind, deliberate, targeted and persistent."

Bullying is often motivated by prejudice against particular groups, for example, on the grounds of race, religion, culture, sexual orientation, gender, homophobia, physical appearance, special educational needs and disability or because a child is adopted or is a carer. It may occur through cyber-technology (social websites, mobile phones, text messages, photographs and email). Bullying is often hidden. It can happen anywhere and at any time.

A 'child-friendly' definition of bullying is shared with pupils in the Prep School.

2.2 CLASSIFYING BULLYING BEHAVIOURS

The VIP classification is useful for identifying bullying behaviours:

- **Verbal:** Name-calling, sarcasm, racist, sexist / homophobic remarks, spreading rumours, taunts, written notes, circulating unflattering drawings or photographic images of someone.
- **Indirect (includes manipulation and emotional forms):** Getting someone else to tease or hit someone, ostracising a fellow pupil by refusing to sit alongside him/her in class, in the Dining Hall, etc. (or by moving away when he/she comes and sits down); the manipulation of social networks to ostracise, marginalize or intimidate individuals; publishing photographs or images of someone that are intended to occasion mockery or gossip. Being unkind, excluding, coercion, complicity in someone else's actions (e.g. as a bystander who looks the other way) tormenting (e.g. hiding books or personal possessions)
- **Physical:** Offensive or threatening gestures, spitting, graffiti, pushing, kicking, hitting, punching or any use of violence, physically humiliating someone (e.g. by "de-bagging" them); taking, damaging or hiding someone's property; invading someone's living space or intruding on their bed-space.

Bullying characterised by racism, sexism, homophobia and the exploitation of disability may involve:

- Spoken comments about someone (their friends or a member of their family), or about some group of pupils.
- Written notes about someone (their friends or a member of their family), or about some group of pupils.
- Emails, web postings or text messages about someone (their friends or a member of their family), or about some group of pupils.
- Phone calls about someone (their friends or a member of their family), or about some group of pupils.
- The defacing of notices with snide remarks about someone (their friends or a member of their family), or about some group of pupils.

Sexual Bullying may involve:

- Bullying that seeks to hurt people by drawing attention to their body shape, hair colour, manner of dress, alleged sexual attractiveness (or lack of it), close friendships (or the absence of intimate relationships in an individual's life).
- Physical action of a sexually intimidating nature (by the invasion of body space, inappropriate touching).

- Spreading rumours about an individual's lifestyle (or the lifestyle of a close friend or relative).
- Spoken comments, written notes, emails, web postings, text messages, phone calls about someone (their friends or a member of their family), or about some group of pupils.
- 'Upskirting', which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

Bullying focused on religion, culture or family background may involve:

- Spoken comments, written notes, emails, web postings etc. that highlight an individual's religion or culture with the purpose of mocking them for cultural or religious difference.
- Comments, web postings etc. that mock a particular religious or cultural tradition for the purpose of discomfoting an individual or group within the school.
- Pejorative religious or cultural descriptors.
- Gossip about an individual's family circumstances, spreading stories about (for example) them being adopted, a parent in a same-sex relationship, a relation in the news for negative reasons.

Electronic or Cyber-bullying relates to:

Malicious, upsetting, repeated emails, photographs, texts and/or other messages or postings sent direct to, or about, an individual. Cyber bullying may involve the use of mobile telephones, email, internet messaging services (such as WhatsApp), social media platforms (such as Facebook, Instagram, Snapchat, Twitter and others), and other technologies and applications which may be developed and become available in the future.

Specific examples include:

- Sending abusive, insulting, threatening or malicious text messages.
- Sending abusive, insulting, threatening or malicious e-mails.
- Posting abusive, threatening or malicious messages on websites, using blogs, personal websites, on-line personal polling sites etc.
- Posting on a social network site facts or photographs of someone with the intention to embarrass or belittle them in the eyes of others.
- Indulging in malicious or spiteful conversations in social media chat groups.
- Spreading abuse, malice or scurrilous gossip by other electronic means.
- Hacking into social networking sites and removing personal material.
- Filming fights or assaults (e.g. "happy slapping" clips) using mobile phone cameras and circulating these using cell phone networks, e-mail or social media.
- Making repeated silent calls to a mobile phone or leaving abusive messages on voice mail.
- "Frapping" (using a pseudonym or someone else's telephone or e-mail account) for anonymity when indulging in bullying.
- 'Catfishing' luring someone into a relationship by means of a fictitious online persona.
- Consensual and non-consensual sharing of nudes and semi nudes images or videos (also known as sexting or youth produced sexual imagery) including those that have been created or adapted using AI.
- 'Upskirting' in the first instance and the sharing of any images by the perpetrator and the passing on of these images by another party. 'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. **It is a criminal offence.**

- Cyberflashing, Epilepsy trolling and encouraging others to engage in serious harm.
All of these are criminal offences

Further information on Cyberbullying can be found in Appendix A.

The School will treat all incidents of bullying as a child protection concern where there is reasonable cause to suspect that a child is suffering, or likely to suffer significant harm.

A young person is breaking the law if they:

- Take an explicit photo or video of themselves or a friend.
- Share an explicit image or video of a child, even if it's shared between children of the same age.
- Possess, download or store an explicit image or video of a child, even if the child gave their permission for it to be created.
- All of the above include images/videos that have been created or manipulated using AI.

Pupils must also understand that:

- Sending someone your sexualised image, when you are under 18, is bullying – it is an action with threatening character because the recipient could face severe legal consequences, and it causes anxiety.
- Passing on a sexualised image of any person under 18 is bullying – it is an action that threatens the recipient and one that demeans the person pictured.
- Sending a sexualised image to try and initiate a romantic relationship is bullying – it is threatening, offensive action.

The consequences of youth produced sexual imagery can be serious for the perpetrator.

- It is illegal in the UK to publish or download a sexual image of someone under 18 even when it is the child him/herself who created and posted the material online.
- If a young person is found creating or sharing images, the police can choose to record that a crime has been committed but that taking formal action isn't in the public interest.

2.2.1 WHAT ACTIONS ARE NOT CONSIDERED BULLYING BEHAVIOUR

Not every act of unkindness or aggression from one child to another is classified as bullying behaviour; disagreements, arguments, and changing friendships are all part of growing up and living in close proximity to others in the boarding environment. Children do make mistakes and say things they later regret and they should be given support to rectify things without the threat of sanctions being imposed which relate to bullying.

The following are not generally considered as bullying behaviour:

- Not liking someone.
- Being excluded (if an isolated occurrence).
- Accidentally bumping into someone.
- Arguments.
- Expression of unpleasant thoughts or feelings regarding others.
- Isolated acts of harassment, aggressive behaviour, intimidation, or meanness.

2.3 WHY IT IS IMPORTANT TO RESPOND TO BULLYING

Bullying hurts and it inevitably results in pain and distress. No one deserves to be a victim of bullying. Everyone has the right to be treated with respect. Pupils who are bullying need to understand and acknowledge the negative impact of their actions. Whilst bullying can take

many forms, all bullying must be viewed as extremely serious, not least because bullying has the potential to cause psychological damage and even suicide.

Bullying of any kind is not acceptable in our school and will not be tolerated. If bullying does occur, **all pupils should be able to tell a member of staff and know that incidents will be dealt with** promptly and effectively.

Racist, sexist, homomisian, transphobic, or other discriminatory behaviour, regardless of circumstances, is always unacceptable and is considered a serious breach of the school's rules. No one should be subjected to unacceptable treatment because of their race, colour, gender, religion, ethnic origin, disability, and sexuality or family circumstances.

The School monitors and records very carefully any instances of bullying so that it can respond quickly and be as pro-active as possible in dealing with any emerging patterns of behaviour.

Strong sanctions such as exclusion may be necessary in cases of severe and persistent bullying.

3 ROLES AND RESPONSIBILITIES

The Governing Body has a legal duty to ensure that an effective anti-bullying strategy is drawn up and implemented. Working towards changing the attitude and behaviour of alleged perpetrators plays a part in the strategies used by the School. The Second Master will report on patterns of bullying and the anti-bullying strategies being followed by the School termly to the Governing Body.

The Second Master (supported by the Assistant Head (Pastoral), DSL and Head of the Prep School) will:

- Produce a termly report of all child-on-child abuse incidents (which includes all aspects as taken from the definition of child-on-child abuse from KCSIE 2025, including bullying in all its forms) for the Headmaster to be presented to the Governing Body.
- Be responsible for the day-to-day management of the policy and systems to prevent child-on-child abuse and bullying and deal with incidents should they occur.
- Ensure that there are positive strategies and procedures in place to help both the victim(s) and alleged perpetrator(s).
- Keep the Headmaster informed of incidents.
- Ensure that records of child-on-child abuse incidents are kept in order that patterns may be identified (and the causes of any such patterns addressed) and to evaluate the effectiveness of the School's approach.
- Determine how best to involve parents in the solution of individual problems.

All members of staff (teaching and non-teaching) and pupils are:

- Expected to show respect for and develop an understanding of persons of differing ability, gender, sexuality, race and background. This is regarded as essential for individual personal and social development.
- Made aware that child-on-child abuse and bullying will not be accepted at the School.
- Responsible for upholding the School Rules, which state that **any form of child-on-child abuse is completely unacceptable** and includes the implementation of the anti-bullying code.

- Made aware of the School's Equal Opportunities Policy and that it is unlawful to treat pupils or staff less favourably for example because of gender, sexuality, race, religion or belief, background or disability.

Members of staff should:

- Set a proper example of respect, kindness, courtesy and good manners.
- Ensure that standards of behaviour are maintained in a quiet, controlled and caring atmosphere.
- Be prepared to challenge any unacceptable behaviour and any use of discriminatory language.
- Deal promptly and effectively with all incidents of child-on-child abuse.
- Proactively gather intelligence about issues between pupils which might provoke conflict.
- Record any incidents of child-on-child abuse and action(s) taken and refer to the Second Master, DSL or Assistant Head (Pastoral), and at the Prep School, the Headmaster.
- Inform Senior House Staff and Tutors, and at the Prep School inform Senior Leaders.
- Enlist the support of Praepostors and House Seniors through training and monitoring of prefect behaviour and effectiveness, and at the Prep School enlist the support of Pupil Leaders and Playground Buddies.
- Make sure that the quality of assemblies is such that the standards of behaviour, which the school upholds, are reinforced.
- Ensure adequate supervision and surveillance within school and be prepared to identify potential danger areas.
- Talk to pupils about issues of difference, through lessons, dedicated events or projects or assemblies.
- Participate in Staff training sessions.

Parents should:

- Report bullying incidents to Senior House Staff as soon as they become aware of them, or at the Prep School, to the Head of Prep School or the Second Master.
- Give specific support for the School's Anti-Bullying Policy.
- Be aware that it is unacceptable to denigrate and bully school staff via social media.

Pupils should:

- Always report incidents of child-on-child abuse or of observed distress inside and outside school.
- Not be passive bystanders. Take action by saying "Leave him/her/them alone."
- Offer support: encourage them to talk to someone, suggest how they might handle it.
- Know that they can raise these issues in confidence by contacting one of the Helplines listed in *Where do I turn?* or on House noticeboards (in corridors at the Prep School) or by contacting the Independent Person.
- Be aware that it is not acceptable for pupils to abuse each other or school staff via social media in the same way that it is unacceptable to do so face to face.
- Understand that they should not retaliate to cyberbullying but report it immediately and save the evidence.
- Encourage a culture of anti-abuse: do not be a passive bystander.
- Understand that prejudiced-based language is unacceptable, and that teasing can be unkind.
- Be expressly taught, during PSHE in all years, the values and principles of:
 - The rights of the individual.
 - Understanding and acceptance of individual differences.

- Building positive relationships.
- Developing emotional intelligence, including empathy and ways of developing resilience.
- Raising self-awareness and self-esteem.
- Social responsibility (i.e. caring for all members of the community).
- Appropriate reporting of rule breaking.
- The difference between good and bad secrets.
- The correct use of the complaints procedure and awareness of the School's policies.
- Keeping passcodes to mobile devices secure and the importance of not leaving a computer logged on.
- Considering their online conduct carefully in accordance with the *Online Safety Policy and Acceptable Use of Devices*.

In PSHE teaching, relevant videos and role-play situations are used, so ways of countering and dealing with bullying are set within the context of social behaviour as a whole. Key events, such as Anti-Bullying Week (organised by the Anti-Bullying Alliance) are supported. The above principles will be reinforced:

- Whenever such issues arise within the wider curriculum.
- In House assemblies.
- In Tutor groups.
- In-House training programmes for the Sixth Form.

4 WHAT PUPILS CAN DO IF THEY ARE BEING BULLIED

- Ignore it if possible.
- Be assertive.
- Try to laugh it off, use humour to deflect.
- Do not retaliate with physical or verbal aggression.
- Talk to people who you know will offer good advice.
- Report it to a member of staff or an older pupil.
- If you're reporting cyberbullying, keep a record of the date and time of the calls, emails or texts - don't delete any messages you receive. If appropriate, take a screenshot of any images or correspondence.
- Build your own protective circle of friends.
- Avoid high risk places.

Giggleswick's 'Who to turn to' information lists the many options for pupils to speak to members of staff. It is available in Houses.

5 ANTI-BULLYING PROCEDURES

All reports must be investigated, however minor, to ensure that a potentially serious case does not develop. There is a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable and should not be tolerated.

Pupils and all staff should be familiar with the document '*Where do I turn?*' which suggests who pupils can talk to if they are feeling unhappy. A Prep School version is displayed around the school for pupils.

Incidents of bullying behaviour or observed distress must be dealt with **immediately** and should be reported as soon as possible to a responsible adult.

The first member of staff involved makes notes with names of those involved, what has happened, and what action has been taken, and copies it immediately to the appropriate Housemistress or Housemaster, or to the Head of the Prep School.

Senior House Staff are responsible in the first instance for the management of such incidents. At the Prep School, the Senior Leadership are responsible in the first instance.

Alleged perpetrators and victims will usually be expected to assist staff in providing detailed written accounts of any incident.

Senior House Staff will keep both the parents of alleged perpetrators and victims informed of the situation and of any outcomes. At the Prep School, this is the responsibility of the Head.

Victims are assured of patient and sympathetic listening and are given on-going advice and support. Where appropriate, contact will be made with external agencies to support a pupil who is experiencing bullying.

Alleged perpetrators should be assured of counselling and rehabilitation, which may involve external agencies, to tackle any underlying issue which has contributed to a child engaging in bullying, as well as appropriate sanction.

A record of clearly substantiated incidents will be kept by the Second Master, who will monitor incidents, identify any patterns and seek to prevent recurrences. At the Prep School, records and monitoring is the responsibility of the Head alongside the SLT.

In the first instance, a '**no blame**' approach is often taken, usually leading to a reconciliation meeting.

Interventions that create empathy and understanding of harm caused appear to be more effective than punitive action.

Existing research suggests that resources should be focused on anti-bias and bystander intervention training, peer support programmes, and restorative justice approaches rather than zero tolerance policies.

Education Policy Institute: "Bullying: A review of the evidence"

12th November 2018

Pupils are usually then given a **verbal warning** with clear advice about future behaviour.

Should the bullying be repeated pupils will receive a formal written warning. The Second Master will contact parents, and an appropriate sanction issued in line with the School's Behaviour Policy.

Given the seriousness with which the school views bullying, persistent inappropriate behaviour may then result in the Headmaster issuing a suspension or expulsion.

When there is reasonable cause to suspect that a child is suffering or is likely to suffer significant harm from bullying, it will be referred to social care as a safeguarding concern by the Designated Safeguarding Lead. Additional procedures will be followed in matters related to sexual violence and harassment, or in the event that a crime may have been committed.

5.1 SANCTIONS LADDER

Level 1 - WARNING

Evidence of 'unpleasantness' towards another pupil. Might typically include name calling / general anti-social behaviour.

- Will probably be a 'one-off' but warrants logging and the pupil being warned and the perpetrator apologising.

Level 2 – CONDUCT DETENTION

Repetition of 'unpleasantness / anti-social' unkind behaviour towards another pupil despite a clear warning.

- Detention – both sets of parents informed. Issued by SHS in consultation with Second Master.

Level 3 – SCHOOL REPORT (SECOND MASTER)

Evidence of persistent bullying behaviour directed at an individual over time (physical and/or emotional).

- School report and letter home.
- Parents of both parties informed.
- Perpetrator to be placed on a Satis report (with specific targets).

Level 4 – HEADMASTER & FORMAL WARNING (UPSCALED SCHOOL REPORT)

A pupil on a school report who fails to uphold expected behavioural standards will see the Headmaster and receive a formal warning. They can also expect to receive a HM's detention.

Level 5 – POSSIBLE SUSPENSION

Subsequent failure to adhere to warning, suspension at Headmaster's discretion.

Level 6 – POSSIBLE PERMANENT EXCLUSION

Permanent exclusion is detailed further in the School's Behaviour, Rewards and Sanctions Policy.

During the process, all pupils will also be offered support and guidance on modifying their behaviour, including counselling if necessary.

An incident may escalate to any point on the ladder according to the severity of any bullying activity uncovered.

6 SEXUAL HARASSMENT AND SEXUAL VIOLENCE

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same

school. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk. Staff should be aware of the importance of:

- challenging inappropriate behaviours;
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and,
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Sexual violence refers to offences under the Sexual Offences Act 2003:

- Rape.
- Assault by Penetration.
- Sexual Assault (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone’s bottom/breasts/genitalia without consent, can still constitute sexual assault).
- Causing someone to engage in sexual activity without consent.

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity and each time activity occurs. Further information about consent can be found here: [Rape Crisis England & Wales](#). It is important to remember that:

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16; and
- sexual intercourse without consent is rape.

When referring to **sexual harassment** we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline and both inside and outside of school’. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It may include:

- consensual and non-consensual sharing of nudes and semi-nudes images and/or videos. As set out in UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people (2024), taking and sharing nude photographs of U18s is a criminal offence as are:
 - sharing of unwanted explicit content;
 - upskirting (is a criminal offence);
 - sexualised online bullying;
 - unwanted sexual comments and messages, including, on social media; and
 - sexual exploitation; coercion and threats.

6.1 THE RESPONSE TO A REPORT OF SEXUAL VIOLENCE OR SEXUAL HARASSMENT

The initial response to a report from a child is incredibly important. How the school responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. By not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying of some behaviours can actually lead to a culture of unacceptable behaviour.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a pupil or a pupil makes a report to them, they should follow the referral process set out in the School's Safeguarding Policies and Procedures.

As is always the case, if staff are in any doubt as to what to do they should speak to the Designated Safeguarding Lead (or a deputy in their absence).

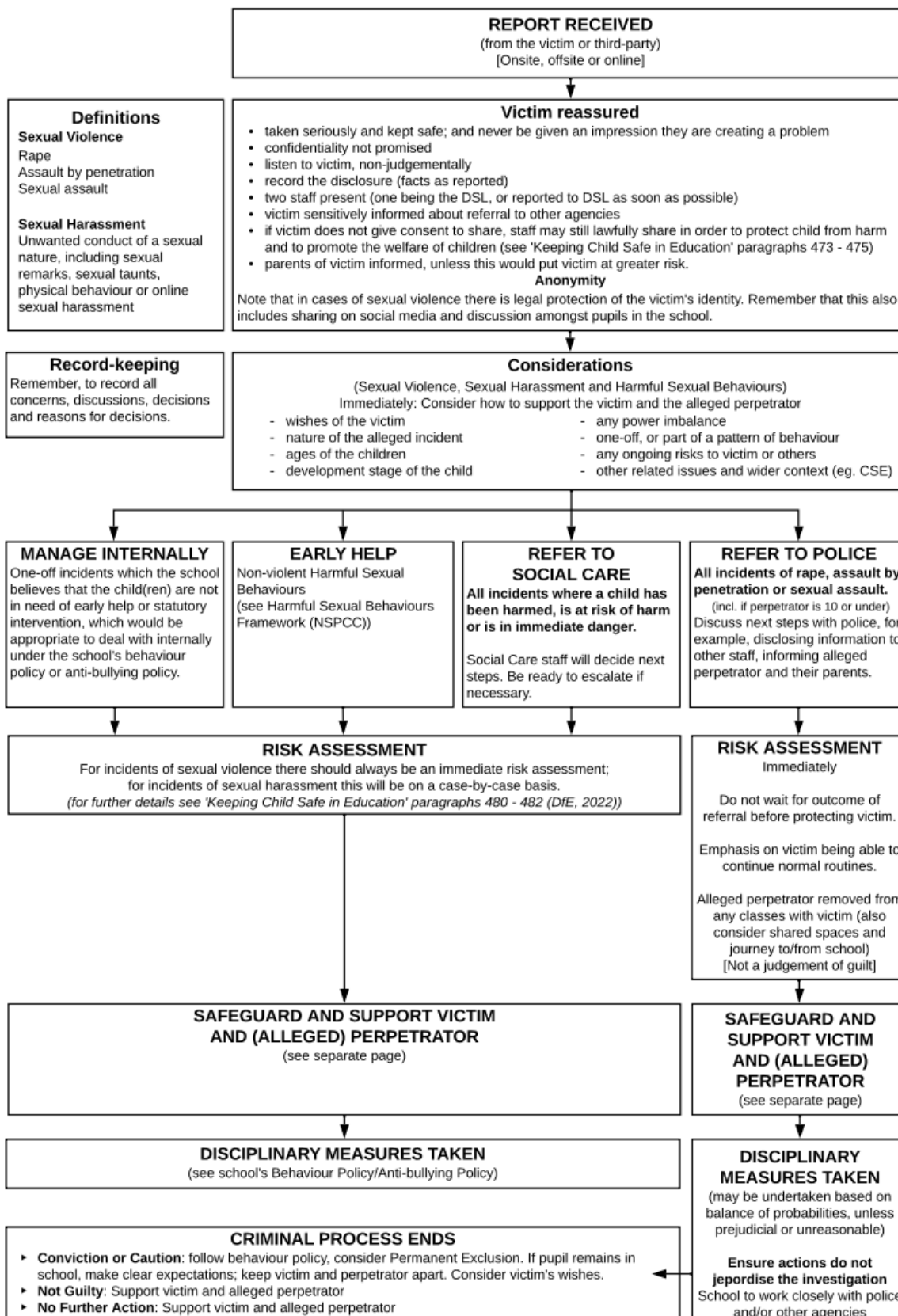
6.1.1 SEXUAL VIOLENCE AND SEXUAL HARASSMENT FLOWCHART

The flowchart overleaf details the School's general response to a report of sexual violence or sexual harassment.

Staff should receive reports of sexual harassment or violence in the appropriate manner as they would any other safeguarding disclosure. If a child is in immediate or imminent danger of harm, then they should remain with the child and, if necessary, call the Police. The DSL must be alerted immediately.

It is of critical importance that written records are kept at every stage of the process, from disclosure onwards. The DSL oversees the maintenance of records and decision-making through the process

***PART FIVE: CHILD-ON-CHILD SEXUAL VIOLENCE AND SEXUAL HARASSMENT**



Source:

*Keeping Children Safe in Education September 2022 (DfE, 2022)

2022 SVSH Flowchart

7 GUIDANCE

- The Equality Act (2010)
<https://www.gov.uk/guidance/equality-act-2010-guidance>
- Preventing and Tackling Bullying: advice for headteachers, staff and governors (DfE, 2017)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/623895/Preventing_and_tackling_bullying_advice.pdf
- Cyberbullying: advice for teachers (DfE, 2014)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/374850/Cyberbullying_Advice_for_Headteachers_and_School_Staff_121114.pdf
- Working together to safeguard children (DfE, 2023 updated June 2025)
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- SEND Code of Practice (DfE, January 2014, updated September 2024)
<https://www.gov.uk/government/publications/send-code-of-practice-0-to-25>
- Keeping Children Safe in Education (DfE September 2025)
- UKCIS Guidance on Sharing nudes and semi nudes: Advice for educational settings working with children and young people (UKCIS, 2024)
<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>
- Searching, screening and confiscation at school: DfE Guidance for Schools (DfE 2018, updated 2023)
<https://www.gov.uk/government/publications/searching-screening-and-confiscation>
- Relationships Education, Relationships and Sex Education (RSE) and Health Education Statutory Guidance (DfE, 2025)
[Relationships Education, Relationships and Sex Education and Health Education guidance](#)

ANNEX A CYBERBULLYING

The School will follow the procedures set out in this policy and in its Safeguarding Policy and Procedures, where relevant, for incidents of cyberbullying, taking such disciplinary action that is considered reasonable in the circumstances, with a view to regulating pupil conduct and protecting the reputation of the School, and the welfare of its pupils.

Cyberbullying may be defined as “the use of electronic communication, particularly mobile phones and the internet, to bully a person, typically by sending messages of an intimidating or threatening nature”. It can take a number of different forms: threats and intimidation, harassment or ‘cyber-stalking’ (e.g. repeatedly sending unwanted texts or instant messages), sending nudes or semi-nudes (e.g. sending and receiving sexually explicit messages, primarily between mobile phones) vilification/defamation, exclusion/peer rejection, impersonation, unauthorised publication of private information/images and ‘trolling’ (abusing the internet to provoke or offend others online). It can be an extension of face-to-face bullying, with technology providing the bully with another route to harass their target.

However, it differs from other forms of bullying in several significant ways:

- by facilitating a far more extreme invasion of personal space. Cyberbullying can take place at any time and intrude into spaces that have previously been regarded as safe and personal.
- the potential for anonymity on the part of the bully. This can be extremely distressing for the victim
- the potential for the bully to play very rapidly to a larger audience so the scale and scope of cyberbullying can be greater than for other forms of bullying.
- through the knowledge that the data is in the world-wide domain, disproportionately amplifying the negative effect on the victim, even though the bully may feel his / her actual actions had been no worse than conventional forms of bullying
- the difficulty in controlling electronically circulated messages as more people get drawn in as accessories. By passing on a humiliating picture or message a bystander becomes an accessory to the bullying.
- the profile of the bully and target can be different to other forms of bullying as cyberbullying can take place between peers and across generations. Teachers can be victims and age and size are not important.
- many cyberbullying incidents can themselves act as evidence, so it is important the victim saves the information.

A.1 CYBERBULLYING AND THE LAW

Bullying is never acceptable and the school fully recognises its duty to protect all of its members and to provide a safe, healthy environment for everyone.

Education Law:

- The Education and Inspections Act 2006 (EIA 2006) outlines some legal powers which relate more directly to cyberbullying. Head teachers have the power ‘to such an extent as is reasonable’ to regulate the conduct of pupils when they are off the school site.
- The Act also provides a defence for staff in confiscating items such as mobile phones from pupils.

Civil and Criminal Law:

- There is not a specific law which makes cyberbullying illegal, but it can be considered a criminal offence under several different acts including Protection from Harassment Act (1997), Malicious Communications Act (1988), Communications Act (2003) Obscene Publications Act (1959) and Computer Misuse Act (1990).

Preventing Cyberbullying

As with all forms of bullying the best way to deal with cyberbullying is to prevent it happening in the first place. There is no single solution to the problem of cyberbullying, but the school will do the following as a minimum to impose a comprehensive and effective prevention strategy:

A.2 ROLES AND RESPONSIBILITIES

The Second Master who is also a Deputy Designated Safeguarding Lead will take overall responsibility for the coordination and implementation of cyberbullying prevention and response strategies. The Second Master will:

- ensure that all incidents of cyberbullying both inside and outside school are dealt with immediately and will be managed and/or escalated in line with the procedures set out in this policy, the Behaviour Policy and Safeguarding Policy and Procedures.
- ensure that all policies relating to safeguarding, including cyberbullying are reviewed and updated regularly.
- ensure that all staff know that they need to report any issues concerning cyberbullying to the Designated Safeguarding Lead.
- ensure that all staff are aware of the Prevent Duties.
- provide training so that staff feel confident to identify children at risk of being drawn into terrorism, to challenge extremist ideas and to know how to make a referral when a child is at risk.
- ensure that parents/carers are informed and attention is drawn annually to the Anti-Bullying Policy so that they are fully aware of the school's responsibility relating to safeguarding pupils and their welfare. The Anti-Bullying Policy is available at all times on the School's website
- ensure that cyberbullying is revisited as part of the PSHE programme and that pupils know how to report a concern.
- ensure that all staff are aware of their responsibilities by providing clear guidance for staff on the use of technology within school and beyond.
- provide annual training for staff on the above policies and procedures provide annual training for staff on online safety
- ensure the school's Acceptable Use Policy and mobile phone policy are reviewed annually

At the Prep School, the Headmaster, who is also the Designated Safeguarding Lead will take responsibility for the coordination and implementation of cyberbullying prevention and response strategies. The Head will:

- ensure that all incidents of cyberbullying both inside and outside school are dealt with immediately and will be managed and/or escalated in line with the procedures set out in this policy, the Behaviour Policy and Safeguarding Policy and Procedures.
- ensure that all policies relating to safeguarding, including cyberbullying are reviewed and updated regularly (with the Second Master).
- ensure that all staff know that they need to report any issues concerning cyberbullying to the Designated Safeguarding Lead.
- ensure that all staff are aware of the Prevent Duties.
- ensure that parents/carers are informed and attention is drawn annually to the Anti-bullying policy so that they are fully aware of the school's responsibility relating to safeguarding pupils and their welfare. This policy is available at all times on the school website.
- ensure that cyberbullying is revisited as part of the PSHE/Computing programme and that pupils know how to report a concern.
- ensure that all staff are aware of their responsibilities by providing clear guidance for staff on the use of technology within school and beyond.

The Computing Subject Lead and the PSHE (PSHE and Computing Leads at the Prep School) Subject Lead will:

- ensure that all pupils are given clear guidance on the use of technology safely and positively both in school and beyond including how to manage their personal data and how to report abuse and bullying online.
- plan and deliver a curriculum on online safety in computing lessons which builds resilience in pupils to protect themselves and others online.
- plan a curriculum in PSHE delivering online safety which builds resilience in pupils to protect themselves and others online.

The IT Department will:

- ensure adequate safeguards are in place to filter and monitor inappropriate content and alert the Designated Safeguarding Lead to safeguarding issues. The internet filter records access to prohibited sites which enables IT Support to report issues immediately to the Designated Safeguarding Lead.
- ensure that the internet filter automatically alerts the DSL to online activity that is of concern (for example nudity, violence, self harm and cyber bullying).
- ensure that visitors to the school are given clear guidance on the use of technology in school. This includes how to report any safeguarding issues to the Designated Safeguarding Lead. Visitors will be given highly restricted guest accounts which will not allow any access to personal data and that any misuse of the system will result in access to the system being withdrawn.

The Bursar will:

- ensure the school manages personal data in line with statutory requirements. The school is aware of its duties under the Data Protection Act (2018). Careful consideration will be given when processing personal information so that the individual's privacy is respected where it needs protection. Access to the personal information will only be given to those who need it. The principles of the Data Protection Act will be applied when processing, collecting, disclosing, retaining or disposing of information relating to a pupil or member of staff.

The Governing Body will:

- appoint a governor in charge of welfare who will work with the Designated Safeguarding Lead to ensure the policies and practices relating to safeguarding including the prevention of cyberbullying are being implemented effectively. The current nominated safeguarding governor is Mr Joss Buchanan.

A.3 GUIDANCE FOR STAFF

Although cyberbullying is not a specific criminal offence, there are, however, criminal laws that may apply to communications of a harassing or threatening manner, cyberflashing, encouraging serious self harm or the unauthorised publication of private images, upskirting, sharing nudes/semi-nudes, and sexting. Where the School considers that a reported incident of cyberbullying may amount to a criminal offence, it will inform the Police.

A3.1 ELECTRONIC DEVICES

In response to an allegation of cyberbullying, certain staff are permitted to conduct a search for electronic devices, such as a pupil's mobile phone, with the authority of the Head. Staff do not require the consent of the pupil, or their parents to undertake a search, provided they have reasonable grounds for suspecting that the pupil is in possession of a prohibited item, or an item that has been, or is likely to be, used to commit an offence, or to cause personal injury to any person (including the pupil being searched), or cause damage to property, and provided they have the Head's prior consent to undertake a search.

As stated in the School's Online Safety Policy, the misuse of mobile phones/digital devices will be dealt with using the same principles set out in the School's Behaviour Policy and the School Rules, with the response being proportionate to the severity of the misuse. Pupils are aware that misuse may lead to the confiscation of their mobile phone/digital device, communication with parents and the imposition of other sanctions up to and including exclusion from school. If the offence is serious, it will be reported to the Police. Where a search finds an electronic device that is prohibited by the School rules, or where the member of staff undertaking the search reasonably suspects that the electronic device has been, or is likely to be, used to commit an offence or cause personal injury or damage to property, the School may examine any data or files on the device, where there is good reason to do so, for example, where there has been an allegation of cyberbullying. Parental consent to search through electronic devices is not required but they will be informed after the event unless doing so presents a further risk to any child.

Any search will be conducted by a designated member of staff (Headmaster/Second Master/Head of Prep School) and should follow the protocol of searching any pupil's possessions outlined in the Searches and Confiscations Policy.

The School will keep a record of all searches carried out, including the results of any search, and the actions taken following that search.

A3.2 EYFS CHILDREN

The School's youngest children are encouraged to behave towards each other with kindness and consideration. All children are valued as individuals. Children's feelings and viewpoints will be listened to and valued. The School believes that children and adults flourish best in an ordered environment, in which everyone knows what is expected of them, and children are free to develop their play and learning without fear of being hurt or hindered by anyone else. The Pre-School Manager is responsible for Behaviour Management in the EYFS setting at Mill House.

The Behaviour Management Policy for EYFS children at Mill House can be found on the School Website.

A3.3 STAFF PROTOCOLS

If staff suspect or are told about a cyberbullying incident, they should follow the protocol outlined below:

Mobile Phones and Digital Devices

- DO NOT ask to see the mobile phone/device – ask the pupil to screenshot anything that could be used as evidence or to save messages/images – report as you would do a bullying incident
- If you suspect that there has been any sharing of nude or semi-nude imagery, DO NOT view the device, take the device immediately and go straight to the DSL. At this point, you should follow the advice as stated in our Safeguarding Policy and Procedures (Section 5.7)
- Inform the Designated Safeguarding Lead immediately and pass them the information and any devices that you have
- Normal procedures to interview pupils and to take statements and gather evidence will then be followed particularly if a safeguarding issue is presented

Guidance for Pupils

If you believe you or someone else is the victim of cyber-bullying, you must speak to an adult as soon as possible. This person could be a parent/guardian, or a member of staff.

- Do not answer abusive messages but save them and report them
- Do not delete anything until told to by the Designated Safeguarding Lead (even if it is upsetting, the material is important evidence which may need to be used later as proof of cyber-bullying)
- Do not give out personal details or contact information without the permission of a parent/guardian (personal data)
- Be careful who you allow to become a friend online and think about what information you want them to see.
- Protect your password. Do not share it with anyone else and change it regularly
- Always log off from the computer when you have finished or if you leave the computer for any reason.
- Always put the privacy filters on to the sites you use. If you are not sure how to do this, ask a teacher or your parents.
- Never reply to abusive e-mails
- Never reply to someone you do not know
- Always stay in public areas in chat rooms
- The school will deal with cyberbullying in the same way as other bullying. Do not think that because it is online it is different to other forms of bullying
- The school will deal with inappropriate use of technology in the same way as other types of inappropriate behaviour and sanctions will be given in line with the school's Behaviour Policy.

Guidance for Parents/Carers

It is vital that parents/carers, and the School, work together to ensure that all pupils are aware of the serious consequences of getting involved in anything that might be seen to be cyber-bullying. Parents/carers must play their role and take responsibility for monitoring their child's online life.

- Parents/carers can help by making sure their child understands the School's policy and, above all, how seriously the School takes incidents of cyber-bullying.
- Parents/carers should also explain to their children legal issues relating to cyber-bullying.
- If parents/carers believe their child is the victim of cyber-bullying, they should save the offending material (if need be by saving the offensive text on their computer or on their child's mobile phone) and make sure they have all relevant information before deleting anything.
- Parents/carers should contact the school as soon as possible.
- If the incident falls in the holidays the school reserves the right to take action against bullying perpetrated outside the School both in and out of term time.

Additional information on Online Safety is contained within the School's Online Safety Policy.

ANNEX B POLICY UPDATES

Revision date	Page	Revision
August 2025	Multiple	Amendments to reflect changes in KCSIE 2025, change in personnel, new filtering processes and grammatical changes.
August 2024	Multiple	Amendments to reflect changes in SLT structure, references and changes to KCSIE 2024
September 2023	Multiple	Minor amendments to definition of child-on-child abuse in line with updated guidance in KCSIE 2023.
September 2022	Multiple	<p>Multiple revisions relating to updated guidance from KCSIE 2022.</p> <p>Addition of Sanctions Ladder (Section 5.1) to provide clear guidance on progression of bullying incidents.</p> <p>Updated language relating to 'alleged perpetrator' and 'victim'; use of child-on-child abuse.</p> <p>Amendment to frequency of reporting of bullying to Governing Body to termly.</p> <p>Addition of Sexual harassment and violence flowchart.</p>
25/1/22	17	Addition of paragraph stating clearly that school will follow procedures of Safeguarding Policy with regards to cyberbullying
	20	Addition of detail regarding the searching of mobile phones/devices
	21	Addition of paragraph on EYFS
	21	Revision of protocols staff should follow for cyberbullying and mobile phones/devices