BURY
GRAMMAR SCHOOL

Anti-Bullying Policy

Date Approved: September 2019 (Reviewed 2022)
Last reviewed: September 2026
Author: Senior Deputy Head (Pastoral)
This policy is for Bury Grammar School

Section A: Whole School

Reference and Guidance

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- Education and Inspections Act 2006
- Equality Act 2010
- Protection from Harassment Act 1997
- Malicious Communications Act 1988
- Public Order Act 1986
- Communications Act 2003
- Human Rights Act 1998
- Crime and Disorder Act 1998
- Education Act 2011
- DfE (2017) Preventing and Tackling Bullying: Advice for headteachers, staff and governing bodies
- DfE(2014) Cyberbullying: advice for headteachers and school staff
- DfE (2018) 'Mental health and wellbeing provision in schools'
- DfE (2026) 'Keeping children safe in education 2026'
- DfE (2026) Working Together to Safeguard Children
- Department for Science, Innovation and Technology and Sport and UK Council for Internet Safety (2024) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- Department for Science, Innovation and Technology and Sport and UK Council for Internet Safety (2024) 'Sharing nudes and semi-nudes: how to respond to an incident (overview)'

When using this policy consideration under the Equality Act 2010 should be made, including issues related to pupils with special educational needs/disabilities and how reasonable adjustments are made for these pupils.

Scope of policy

This policy applies to all pupils at Bury Grammar School. Section B refers to procedures in the Senior School and Section C refers to procedures in the Primary Division as applicable.

The aims of this policy are to:

a) contribute to creating a climate of prevention of discrimination, harassment, victimisation, and other conduct associated but not exclusively with the protected characteristics such as age,

disability, gender reassignment, race, religion or belief, sex and sexual orientation or because a child is adopted or a carer;

b) give clear guidelines to pupils, staff and parents and to clarify the roles of all involved in the school when a case of bullying is suspected;
c) create a climate of openness and support;
d) enable teachers to maintain a consistent approach;
e) provide clear procedures for involving parents;
f) demonstrate that as a school we do not tolerate bullying;
g) provide a mechanism for reviewing the effectiveness of the Anti-Bullying Policy, and
h) ensure that the school has a clear picture of bullying incidents throughout the school.

Introduction

BGS works to support victims of bullying and adopts a robust approach to those who bully others. All cases of reported bullying are recorded and investigated including those where bullying has not in fact occurred.

We recognise that we are dealing with young people who make mistakes and may be at different stages of emotional maturity. Whilst bullies should expect to be dealt with robustly, we normally seek to reintegrate them quickly and to address their needs as appropriate. We take our duty to all pupils entrusted to our care seriously and take all reasonable steps to address the needs of every pupil.

We encourage pupils to report bullying both of themselves and of others as soon as possible. We are committed to taking such reports seriously and to responding to them quickly, appropriately and effectively. We encourage parents to contact us as soon as possible if they have concerns about bullying.

In addition, parents/carers have an important role in supporting the school in maintaining high standards of behaviour. It is essential that the school and parents/carers have consistent expectations of behaviour and that they co-operate closely.

In all matters relating to safeguarding, the School will follow the procedures of the Bury Safeguarding Children Partnership and current statutory guidance, including *Working Together to Safeguard Children (2026)* and *Keeping Children Safe in Education (2026)*. Bullying will always be considered through a safeguarding lens, recognising that it may be both a form of child-on-child abuse and an indicator of wider unmet need, abuse, exploitation or harm.

We are committed to investigating and resolving bullying which occurs in school and out of school and will cooperate with partner agencies if a complaint of bullying is made about one of our pupils against a pupil who does not attend our school.

What is 'bullying'?

Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for

instance, cyber-bullying via text messages, social media or gaming, which can include the use of images and video) and is often motivated by prejudice against particular groups, for example on grounds of race, religion, culture, sex, gender, sexual orientation, special educational needs and disability, or because a child is adopted, in care or has caring responsibilities. It may occur directly or through cyber-technology (social websites, mobile phones, text messages, photographs and email.) It might be motivated by actual differences between children, or perceived differences.

Bullying often involves an imbalance of power between the perpetrator and the victim. This could involve perpetrators of bullying having control over the relationship which makes it difficult for those they bully to defend themselves. The imbalance of power can manifest itself in several ways, it may be physical, psychological (knowing what upsets someone), derive from an intellectual imbalance, or by having access to the support of a group, or the capacity to socially isolate. It can result in the intimidation of a person or persons through the threat of violence or by isolating them either physically or online.

Whatever form the bullying takes or by whatever method, the school takes such reports seriously. Bullying on the basis of protected characteristics is taken particularly seriously Although the school adopts the definition of bullying as behaviour which may be 'repeated over time', it will respond, take appropriate action and record single incidents of behaviour to ensure that it does not become the first of a series of incidents. This will enable the school to monitor our success in meeting other standards such as instilling values of tolerance and respect and actively promoting the well-being of pupils.

In Summary:

Bullying is generally characterised by:

- **Repetition:** Incidents are not one-offs; they are frequent and happen over an extended period of time.
- **Intent:** The perpetrator means to cause verbal, physical or emotional harm; it is not accidental.
- **Targeting:** Bullying is generally targeted at a specific individual or group.
- **Power imbalance:** Whether real or perceived, bullying is generally based on unequal power relations.

Examples are:

- **Physical bullying** such as hitting, kicking, pushing people around, spitting; or taking, damaging or hiding possessions.
- **Verbal bullying** – name-calling, taunting, teasing, insulting, demanding money or possessions, any remarks which take advantage of a pupil's race, religion, culture, sexuality, gender, special
- **Online-** Using any electronic facility including the use of cyber technology (social websites, mobile phones, photographs and email) in a way that upsets or intimidates others in the school.
- **Racist bullying:** Bullying another person based on their ethnic background or skin colour. Racist bullying is a criminal offence under the Crime and Disorder Act 1998 and Public Order Act 1986.
- **Homophobic and biphobic bullying:** Bullying another person because of their actual or perceived sexual orientation.

- **Transphobic bullying:** Bullying based on another person's gender identity or gender presentation, or for not conforming to dominant gender roles.
- **Sexist bullying:** Bullying based on sexist attitudes expressed in a way to demean, intimidate or harm another person because of their sex or gender. Sexist bullying may sometimes be characterised by inappropriate sexual behaviours.
- **Sexual bullying:** Bullying behaviour that has a physical, psychological, verbal or non-verbal sexual dimension or dynamic that subordinates, humiliates or intimidates another person. This is commonly underpinned by sexist attitudes or gender stereotypes.
- **Ableist bullying:** Bullying behaviour that focusses on another person's disability or support needs; this can include mocking the individual's disability or their needs, using derogatory words or slurs in relation to an individual's disability, or deliberately excluding an individual because of their disability.
- **Prejudicial bullying:** Bullying based on prejudices directed towards specific characteristics or experiences, e.g. religion or mental health issues.
- **Relational bullying:** Bullying that primarily constitutes of excluding, isolating and ostracising someone – usually through verbal and emotional bullying.
- **Socioeconomic bullying:** Bullying based on prejudices against the perceived social status of the victim, including, but not limited to, their economic status, their parents' occupations, their health or nutrition level, or the perceived "quality" of their clothing or belongings.

Homophobic, Biphobic and Transphobic (HB) bullying is behaviour or language which makes a person feel unwelcome or marginalised because of their sexual orientation or gender identity, whether actual or perceived, or because of their association with people who are, or perceived to be gay, bisexual or transgender (e.g., children of same –sex couples). HBT bullying affects students who are LGBT, have friends and family who are LGBT, don't conform to gender stereotypes e.g. pupils who like to dance or are just perceived to be different.

Bullying that includes extremist language, hate speech, or discriminatory views may signal a safeguarding risk under the Prevent Duty. This includes: Derogatory comments based on religion, race, nationality, gender, or sexuality, promotion of extremist ideologies or conspiracy narratives and attempts to intimidate or radicalise others

All such incidents must be reported to the DSL and may lead to external safeguarding or Prevent referrals.

Any bullying that involves exploitation, coercion, grooming, or harassment may also meet the threshold for safeguarding or criminal concern.

Statutory requirements

The school understands that, under the Equality Act 2010, it has a responsibility to:

- Eliminate unlawful discrimination, harassment, including sexual harassment, victimisation and any other conduct prohibited by the act.
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it.
- Foster good relations between people who share a protected characteristic and people who do not share it.

The school understands that, under the Human Rights Act (HRA) 1998, it could have charges brought against it if it allows the rights of pupils to be breached by failing to take bullying seriously. The principal will ensure that this policy complies with the HRA; the principal understands that they cannot do this without fully involving their teaching staff.

Although bullying itself is not a criminal offence, some types of harassment, threatening behaviour and/or communications may be considered criminal offences:

- Under the Malicious Communications Act 1988, it is an offence for a person to electronically communicate with another person with the intent to cause distress or anxiety, or in a way which conveys a message which is indecent or grossly offensive, a threat, or contains information which is false and known or believed to be false by the sender.
- The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct amounting to harassment.
- Section 127 of the Communications Act 2003 makes it an offence to send, by means of a public electronic communications network, a message, or other matter, that is grossly offensive or of an indecent, obscene or menacing character. It is unlawful to disseminate defamatory information through any media, including internet sites.
- Other forms of bullying which are illegal and should be reported to the police include violence or assault, theft, repeated harassment or intimidation, and hate crimes.

Signs of bullying

Staff will be alert to the following signs that may indicate a pupil is a victim of bullying:

- Being frightened to travel to or from school
- Unwillingness to attend school
- Repeated or persistent absence from school
- Patterns of persistent or severe absence following bullying concerns, recognising that attendance changes may indicate escalating safeguarding risk.
- Becoming anxious or lacking confidence
- Saying that they feel ill repeatedly
- Decreased involvement in school work
- Leaving school with torn clothes or damaged possessions
- Missing possessions
- Missing dinner money
- Asking for extra money or stealing
- Cuts or bruises
- Lack of appetite
- Unwillingness to use the internet or mobile devices
- Lack of eye contact
- Becoming short tempered
- Change in behaviour and attitude at home

Although the signs outlined above may not be due to bullying, they may be due to deeper social, emotional or mental health issues, so are still worth investigating. Pupils who display a number of these signs will be approached by a member of staff to determine the underlying issues causing this behaviour.

Staff should exercise professional curiosity when considering bullying concerns and seek to understand the wider context of a pupil's behaviour, relationships, attendance, online activity, wellbeing, family circumstances and any safeguarding concerns.

Staff will be aware of the potential factors that may indicate a pupil is likely to exhibit bullying behaviours, including, but not limited to, the following:

- They have experienced mental health problems, which have led to them becoming more easily aggravated
- They have been the victim of abuse
- Their academic performance has started to fall and they are showing signs of stress

If staff become aware of any factors that could lead to bullying behaviours, they will notify the pupil's form tutor and/or Head of Year and DSL who will investigate the matter and monitor the situation.

The seriousness of bullying

Bullying behaviour is unacceptable and will not be tolerated at the school since it is harmful to the person who is bullied, those who engage in bullying behaviour and those who support them. It can cause physical harm and, in some cases, lead to lasting emotional and psychological damage, eating disorders, self-harm and even suicide. It interferes with a pupil's right to enjoy their learning and personal time, free from intimidation. Bullying is contrary to the school's aims and culture and therefore, Bury Grammar School takes bullying, and allegations of bullying, very seriously.

Whilst bullying is not a specific criminal offence, there are criminal laws which apply to harassment and to violent and threatening behaviour. No one deserves to be a victim of bullying; everybody has the right to be treated with respect. The school will support any pupil who is a victim of bullying. Pupils who have engaged in bullying behaviour will be subject to appropriate disciplinary sanction and will also, where possible, be supported in learning different ways of behaving.

The school regards bullying as a form of Child-on-Child abuse; as such, where appropriate, it will be dealt with as a safeguarding issue. Further details on the school's approach to Child-on-Child abuse can be found in the Safeguarding and Child-on-Child Abuse Policy.

Child-on-Child Abuse

The school has a zero-tolerance approach to all forms of child-on-child abuse, including sexual harassment and sexual violence. To prevent child-on-child abuse and address the wider societal factors that can influence behaviour, the school will educate pupils about abuse, its forms, and the importance of discussing any concerns and respecting others through the pastoral and wider curriculum, assemblies and PSHE lessons

All staff will:

- Be aware that pupils of any age and gender are capable of abusing their peers.
- Be aware that abuse can occur inside and outside of school settings.
- Be aware of the scale of harassment or abuse, and that just because it is not being reported does not mean it is not happening.
- Take all instances of child-on-child abuse equally seriously regardless of the characteristics of the perpetrators or victims.
- Never tolerate abuse as “banter” or “part of growing up”, and will never justify sexual harassment, e.g. as “boys being boys”, as this can foster a culture of unacceptable behaviours and one that risks normalising abuse.
- Be aware that child-on-child abuse can be manifested in many ways, including sexting, sexual harassment and assault, and hazing or initiation-type violence.
- Always challenge any harmful physical behaviour that is sexual in nature, such inappropriate touching. Dismissing or tolerating such behaviours risks normalising them.

Sexual harassment in particular can take many forms, including but not limited to:

- Telling sexual stories, making sexual remarks, or calling someone sexualised names.
- Sexual “jokes” or taunting.
- Deliberately brushing against someone.
- Displaying images or video of a sexual nature.
- Upskirting (this is a criminal offence).
- Online sexual harassment, e.g. creating or sharing sexual imagery, sexual comments on social media, or sexual coercion or threats.

Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled – this includes the process for reporting concerns about friends or peers. If a pupil has been harmed, is in immediate danger or is at risk of harm, a referral may be made to children’s social care and potentially the police, where the DSL deems this appropriate in the circumstances.

All staff will be aware and sensitive towards the fact that pupils may not be ready or know how to tell someone that they are being abused. Pupils being abused may feel embarrassed, humiliated, scared, or threatened.

The school’s Child-on-child Abuse Policy outlines the school’s stance on addressing child-on-child abuse, including sexual abuse, and the procedures in place will be adhered to if any instances are uncovered or disclosed. More information on the school’s approach to preventing and managing instances of child-on-child abuse can be found within this policy and the school’s Safeguarding Policy.

Vulnerable Pupils

The school recognises that bullying can happen to all children and young people, and it can affect their social, mental and emotional health. School staff will support all pupils who are bullied. This means being alert to the effect any form of bullying can have and being especially alert to where it may have a severe impact.

There is evidence to suggest that pupils that are badly bullied in school are more likely to be bullied out of school, for instance either on their way to or from school or through cyberbullying. Some pupils are more likely to be the target of bullying because of the attitudes and behaviours some young people have towards those who are different from themselves. For example, those with special educational needs or disabilities, those who are adopted, those who are suffering from a health problem, those with caring responsibilities and those from socioeconomically disadvantaged backgrounds may be more likely to experience bullying because of difference. Children in care that are frequently on the move may also be vulnerable because they are always the newcomer.

The school recognises that these young people are often the same young people who might need greater support to deal with the impact of bullying, for example those who are going through a personal or family crisis. Pupils with certain characteristics are also more likely to be targets of bullying, including, but not limited to; Pupils who are LGBTQ+, or perceived to be LGBTQ+, Black, Asian and minority, Pupils with SEMH Needs, Looked After or Previously Looked After Children, Pupils with a social worker, Young Careres and SEND pupils. Children with special educational needs or disabilities can often lack the social or communication skills to report such incidents so it is important that staff are alert to the potential bullying this group faces and that their mechanisms for reporting are accessible to all.

Staff are expected to make reasonable adjustments when responding to bullying involving these groups, including tailoring support and considering alternative reporting routes.

Special Educational Needs and Disabilities

The school is always particularly vigilant where concerns relate to children with special educational needs and disabilities, as additional barriers can exist in identifying abuse and bullying in this group of children:

- care should be taken not to assume that indicators of bullying such as anxious behaviour, low mood and injury relate only to a child's disability without further exploration
- it is recognised that children with SEN and other disabilities can be more vulnerable to and harmed by abusive behaviour such as bullying, even when they don't exhibit any obvious signs of distress
- it is recognised that children with SEN and other disabilities may experience barriers in communicating their concerns about bullying and may need specific additional support.

Cyberbullying

Cyberbullying can take many forms and can go even further than face-to-face bullying by invading personal space and home life, and can target more than one person. It can also take place across age

groups and target pupils, staff and others, and may take place inside school, within the wider community, at home or when travelling. It can sometimes draw bystanders into being accessories.

Cyberbullying can include the following:

- Threatening, intimidating or upsetting text messages
- Threatening or embarrassing pictures and video clips
- Disclosure of private sexual photographs or videos with the intent to cause distress
- Silent or abusive phone calls
- Using the victim's phone to harass others, to make them think the victim is responsible
- Threatening or bullying emails, possibly sent using a pseudonym or someone else's name
- Menacing or upsetting responses to someone in a chatroom
- Unpleasant messages sent via instant messaging
- Unpleasant or defamatory information posted to blogs, personal websites and social networking sites, e.g. Facebook

The above list is not exhaustive, and cyberbullying may take other forms.
The school has a zero-tolerance approach to cyberbullying. The school views cyberbullying with the same severity as any other form of bullying and will follow the sanctions set out in this policy if they become aware of any incidents.

All members of staff will receive training on an annual basis on the signs of cyberbullying, in order to identify pupils who may be experiencing issues and intervene effectively.

Many of the signs of cyberbullying will be similar to those found in the 'Signs of bullying' section of this policy; however, staff will be alert to the following signs that may indicate a pupil is being cyberbullied:

- Avoiding use of the computer
- Being on their phone routinely
- Becoming agitated when receiving calls or text messages

Staff will also be alert to the following signs which may indicate that a pupil is cyberbullying others:

- Avoiding using the computer or turning off the screen when someone is near
- Acting in a secretive manner when using the computer or mobile phone
- Spending excessive amounts of time on the computer or mobile phone
- Becoming upset or angry when the computer or mobile phone is taken away

During times when remote education is being utilised, the school will frequently be in contact with parents to make them aware of their activities online, but also to reinforce the importance of pupils staying safe online, and explaining how filtering and monitoring procedures work.

Staff will be aware that a cyberbullying incident might include features different to other forms of bullying, prompting a particular response. Significant differences may include the following:

- **Possible extensive scale and scope** – pupils may be bullied on multiple platforms and using multiple different methods that are made possible by virtue of the bullying taking place online

- **The anytime and anywhere nature of cyberbullying** – pupils may not have an escape from the torment when they are at home due to the bullying continuing through technology at all times
- **The person being bullied might not know who the perpetrator is** – it is easy for individuals to remain anonymous online and on social media, and pupils may be bullied by someone who is concealing their own identity
- **The perpetrator might not realise that their actions are bullying** – sometimes, the culture of social media, and the inability to see the impact that words are having on someone, may lead to pupils crossing boundaries without realising
- **The victim of the bullying may have evidence of what has happened** – pupils may have taken screenshots of bullying, or there may be a digital footprint that can identify the perpetrator

Pupils will be instructed not to respond or retaliate to cyberbullying incidents. Evidence of the incident should be recorded, e.g. taking screenshots. Pupils will report incidents to a trusted member of staff so that the incident can be investigated and support can be provided.

Where offensive content is posted online targeting a staff member or pupil, the person targeted will be encouraged to use the reporting mechanism on the website or social media platform to request its removal. Where the person who has posted it is known to the school, the DSL will request they remove it directly.

The school will support pupils who have been victims of cyberbullying by holding formal and informal discussions with the pupil about their feelings and whether the bullying has stopped, in accordance with this policy.

In accordance with the Education Act 2011, the school has the right to examine and delete files from pupils' personal devices, e.g. mobiles phones, where there is good reason to do so. This power applies to all schools and there is no need to have parental consent to search through a young person's mobile phone. In these cases, the school's Searching Pupils Policy will be followed.

Cyber Bullying- Preventative Measures

For the prevention of cyberbullying, in addition to the measures described above, the school:

- expects all pupils to act in accordance with the school's rules and its policies on Acceptable Use, Mobile Phones and Online Safety.
- blocks inappropriate sites and material via its filtering system, and has usage monitored by the DSLs.
- may impose disciplinary sanctions for the misuse, or attempted misuse, of the internet.
- issues all pupils with their own personal school email address.
- offers guidance on the safe use of social networking sites and cyberbullying in PSHE lessons
- offers guidance on keeping names, addresses, passwords, mobile phone numbers and other personal details safe.
- does not allow the use of devices in toilets, washing and changing areas.

Staff are trained to respond to incidents involving:
- Sharing of indecent or sexualised images, including AI-generated content
- Anonymous or group chat-based bullying

- Online impersonation or identity abuse
- Exposure to hate content or harmful narratives (including extremist ideologies)
- AI-enabled bullying, manipulation or grooming, including misuse of large language AI chatbots or recommendation algorithms that encourage harmful, abusive or exploitative behaviour.

Where this behaviour presents a risk of harm, it must be referred to the DSL immediately and managed as a safeguarding concern under the Safeguarding, Child-on-Child Abuse Policy and KCSIE 2026.

Acceptable Use Policy

The school publishes and implements a pupil and staff Acceptable Use Policy (AUP) which is designed to support both its safeguarding and anti-bullying systems. The AUP seeks to combat cyber-bullying by preventing misuse of the school's computers and electronic equipment, promote online safety amongst pupils and staff, and to facilitate a system for reporting instances where electronic devices have been misused.

BGS Anti-Bullying awareness raising

Through the course of PSHE lessons, assemblies and other activities such as the annual Anti-Bullying Week, pupils are made aware of the school's stand on bullying and what to do if they are being bullied or witness others being bullied. Staff are regularly made aware of their responsibility. Although bullying is more likely to take place in some parts of the school than others, the school recognises that bullying can take place anywhere at any time. All staff have the appropriate training to respond to individual cases and awareness of the risk and indications of child abuse and bullying. This training includes provision for raising awareness of the additional vulnerability of particular groups within the school community, e.g., those with special educational needs and gay or bisexual pupils. The school regularly liaises with appropriate external agencies to seek advice on how to improve the effectiveness of its anti-bullying system. Staff are trained and expected to be vigilant with regards to pupil welfare at all times and report any concerns. They are encouraged to be alert to changes in behaviour or other evidence that may indicate that a pupil is being bullied. Senior pastoral staff are trained to ensure a consistent and appropriate response to any reports of bullying. Bullying is regularly discussed in a wide variety of meetings and fora, involving, for example, the Pastoral Strategy Group, Pastoral Leadership Team, School Council, the wider Pastoral Team, Tutors, and the school Health Team.

The Importance of Pupil Voice

The school employs a number of strategies to ensure that its pupils have the opportunity to express their views on bullying and give feedback on the effectiveness of the school's policies and procedures. These include School Council, occasional questionnaires and small focus groups with pupils.

Creating an anti-bullying culture

Any pupil or member of staff who witnesses or hears of an incident of bullying is expected to report it. Any complaint of bullying will be always taken seriously, and no-one will tolerate unkind actions or

remarks or stand by when someone else is being bullied. Through their training and experience, staff are expected to promote an anti-bullying culture by celebrating achievement, anticipating problems and providing support, disciplining pupils sensibly and fairly, making opportunities to listen to pupils and acting as advocates of pupils. Pupils are taught that bullying will not be tolerated at Bury Grammar School and are given guidance, both on how to report bullying and how to seek support. They are encouraged to celebrate the effort and achievements of others, promote positive attitudes, share problems with staff, turn to someone they trust if they have a problem, and not to feel guilty when making complaints.

Through its curriculum, pastoral system and enrichment programme, the school seeks to educate its pupils to be respectful, thoughtful, emotionally robust and resilient. Discriminatory words and behaviour are unacceptable at BGS. The use of racist language, for example, by pupils towards each other will not be tolerated or dismissed as 'banter' but tackled assertively (as bullying where appropriate) with a view to preventing it from happening again. Our pupils are encouraged to treat all people with equal respect and dignity, and not discriminate against anyone on any basis, including disability, race, culture, gender, religion or sexual orientation.

A wide-ranging PSHE programme exists across the school to educate pupils about the impact of bullying, the differences between people and the importance of avoiding prejudice-based language. In addition, pupils are involved in anti-bullying work through the prefect system and the Equality and Diversity Committee and pupil ambassador programme. Senior pupils are expected to set a good example and be helpful to younger pupils.

Anti-Bullying messages are also given and reinforced during form time periods.

Support

In the event of bullying, victims will be offered the following support:

- Emotional support and reassurance from the school counsellor
- Reassurance that it was right to report the incident and that appropriate action will be taken
- Liaison with their parents to ensure a continuous dialogue of support
- Advice not to retaliate or reply, but to keep the evidence and show or give it to their parent or a member of staff
- Advice on aspects of online safety, in the event of cyberbullying, to prevent re-occurrence, including, where appropriate, discussion with their parents to evaluate their online habits and age-appropriate advice on how the perpetrator might be blocked online
- Discussion with their parent on whether police action is required (except in serious cases of child exploitation or abuse where the police may be contacted without discussion with parents)

The views, wishes and feelings of the pupil will be sought throughout the investigation and support process, taking account of the pupil's age, understanding, communication needs and any SEND or additional vulnerabilities.

The DSL will carefully consider in each instance of bullying that is handled whether it is appropriate to split up the victim(s) and perpetrator(s), e.g. preventing them sharing classes or spaces where possible,

and will split up other harmful group dynamics to prevent further occurrences where necessary. Victims will be encouraged to broaden their friendship groups by joining lunchtime or after-school clubs or activities.

Staff, particularly the DSL, will work with the victim to build resilience, e.g. by offering emotional therapy.

The school will acknowledge that bullying may be an indication of underlying mental health issues. Perpetrators will be required to attend a mandatory counselling session to assist with any underlying mental health or emotional wellbeing issues. The school will work with the perpetrator regarding any underlying mental health or emotional wellbeing problems.

Follow-up support

The progress of both the perpetrator and the victim will be monitored by their form tutors. One-on-one sessions to discuss how the victim and perpetrator are progressing may be appropriate. If appropriate, follow-up correspondence will be arranged with parents after the incident.

Pupils who have been bullied will be offered continuous support. The DSL or a member of the pastoral team will check in regularly with the pupil to check whether the bullying has stopped. These will continue to take place until the head of year and victim are confident the bullying has stopped. The victim will be encouraged to tell a trusted adult in school if bullying is repeated.

Pupils who have bullied others will be supported in the following ways:

- Receiving a consequence for their actions
- Being able to discuss what happened
- Being helped to reflect on why they became involved
- Being helped to understand what they did wrong and why they need to change their behaviour
- Appropriate assistance from parents

Pupils who have been bullied will be assessed on a case-by-case basis and the DSL will, if necessary, refer the victim of bullying to CAMHS.

Bullying outside of school

Staff will remain aware that bullying can happen both in and outside of school, and will ensure that they understand how to respond to reports of bullying that occurred outside school in line with the Child Protection and Safeguarding Policy and the Child-on-child Abuse Policy.

When investigating bullying, staff will consider whether incidents may be linked to wider contextual safeguarding concerns, including child criminal exploitation, child sexual exploitation, harmful peer groups, online harms, coercion, misogyny, radicalisation or other risks occurring beyond the family home.

Where wider unmet needs are identified, the DSL may consider Early Help or Family Help support alongside safeguarding intervention.

The Principal has a specific statutory power to sanction pupils for poor behaviour outside of the school premises. Section 89(5) of the Education and Inspections Act 2006 gives the headteacher the power to regulate pupils' conduct when they are not on school premises, and therefore, not under the lawful charge of a school staff member.

The school power to sanction pupils for misbehaving outside of the school premises. This can relate to any bullying incidents occurring anywhere off the school premises, e.g. on school or public transport, outside the local shops, or in a town or village centre.

Where bullying outside school is reported to school staff, it will be investigated and acted upon. In all cases of misbehaviour or bullying, members of staff can only sanction the pupil on school premises, or elsewhere when the pupil is under the lawful control of the member of staff, e.g. on a school trip.

The Principal or DSL is responsible for determining whether it is appropriate to notify the police of the action taken against a pupil. If the misbehaviour could be of a criminal nature, or poses a serious threat to a member of the public, the police will be informed.

Sanctions

If the DSL is satisfied that bullying did take place, the perpetrator will be helped to understand the consequences of their actions and warned that there must be no further incidents. The DSL or member of the pastoral team will inform the perpetrator of the type of sanction to be used in this instance, e.g. detentions or service-based activities, and future sanctions if the bullying continues.

If possible, the school will attempt reconciliation/ restorative practices and will obtain an apology from the perpetrator. This will either be in writing to the victim, and/or witnesses if appropriate, or face-to-face, but only with the victim's full consent. Discretion will be used here; victims will never feel pressured into a face-to-face meeting with the perpetrator.

Parents are informed of bullying incidents and what action is being taken.

All staff involved in managing instances of bullying will be aware that sanctions and providing support are not mutually exclusive actions, and should be conducted simultaneously to encourage more positive behaviour in future.

The school will avoid unnecessarily criminalising pupils for bullying or abusive behaviour where possible, as young people with criminal records face stigma and discrimination in future aspects of their lives. The school's focus when handling perpetrators will be supporting them to develop more positive behaviours and to refrain from abusive and bullying behaviours in the future.

The head of year informally monitors the pupils involved regularly over a sustained period throughout the school year.

The school will remain cognisant of the fact that continued access to school can be important for rehabilitation of harmful behaviour and will not exclude pupils unless as a last resort – where there have been serious or consistent incidents of bullying, the school will act in line with the Suspension and Exclusion Policy.

Record keeping

The DSL will ensure that robust records are kept with regard to all reported or otherwise uncovered incidents of bullying – this includes recording where decisions have been made, e.g. sanctions, support, escalation of a situation and resolutions. It is extremely important that thorough investigations into bullying incidents are carried out and documented.

- A CPOMS log must be opened as soon as a report of bullying is made and before it has been substantiated or otherwise.
- When investigating bullying, staff will consider whether incidents may be linked to wider contextual safeguarding concerns, including child criminal exploitation, child sexual exploitation, harmful peer groups, online harms, coercion, misogyny, radicalisation or other risks occurring beyond the family home.
- The incident should be fully investigated, usually by the Head of Section/Year or Deputy Head/PCL or Head of Infants or Juniors
- An 'investigation pack' must be assembled including:
    - Pupil Accounts and
    - any other evidence such as screen shots from computers or mobile phones etc.
- The investigation pack must be attached to the CPOMS log.
- All cases of bullying, whether substantiated or not, will be recorded electronically on the CPOMS system. If bullying is substantiated, in addition to the record on CPOMS, the investigation pack including a Pastoral Incident Report Form (PIRF) will be kept in the Bullying File held by the DSL.
- A log of all bullying incidents must be kept and made available to the Independent Schools Inspectorate.

The DSL will ensure that all decisions and actions recorded are reviewed on a regular basis for the purposes of:

- Identifying patterns of concerning, problematic or inappropriate behaviour on the part of certain pupils that may need to be handled, e.g. with pastoral support.
- Reflecting on whether cases could have been handled better and using these reflections to inform future practice.
- Considering whether there are wider cultural issues at play within the school, e.g. whether school culture facilitates discriminatory bullying by not adequately addressing instances, and planning to mitigate this.
- Considering whether prevention strategies could be strengthened based on any patterns in the cases that arise.
- Monitoring will also consider any disproportionate patterns relating to SEND, disability, ethnicity, sex, mental health need, attendance, looked-after status, pupils with a social worker and other identified vulnerabilities.
- Responding to any complaints about how cases have been handled.

Monitoring and review

The DSLs monitor the implementation of this policy and write an annual report on bullying.

This policy will be reviewed annually or owing to:

- publication of new guidance from the DfE
- significant changes to safeguarding legislation or statutory guidance, including Keeping Children Safe in Education or Working Together to Safeguard Children.
- publication of new ISI regulations
- bullying annual report
- bullying audits
- complaints/concerns from parents

Where appropriate, the school may review CCTV footage to support the investigation of serious or persistent bullying incidents that occur on school premises. The use of CCTV is governed by the School's CCTV Policy and is compliant with the Data Protection Act 2018 and UK GDPR. Any decision to view or share footage will be proportionate, necessary, and approved by a member of the Senior Leadership Team.

Section B: Senior School and Sixth Form

Advice for pupils who are experiencing or witnessing bullying

If you are being bullied, or if you are aware of someone else being bullied, then you should tell your Form Tutor as soon as possible. If you feel unable to tell your Form Tutor, then you should tell your Head of Section/Year, the school Health Support Worker or any other member of staff. You should also tell your parents. You should be prepared to give details of who the bullies are, when and where the bullying takes place and if there are any other victims.

Advice to parents

We encourage parents to contact the school if they have any concerns regarding bullying. We recognise that bullying incidents can be extremely upsetting for parents, and you can expect your concern to be taken seriously and dealt with in a professional manner.

If your son/daughter discloses to you that they are being bullied, then you should try to get as much detailed information from them as possible. You should then contact your son/daughter's Head of Year/Section as soon as possible. The school will investigate the allegation and will keep you informed of the progress of the investigation. Even after the problem has been resolved your son/daughter's Head of Year/Section will continue to monitor the situation to ensure that there are no recurrences. If bullying is substantiated, you can expect the investigation to result in reasonable and proportionate sanctions. If at any time you are unhappy with the way in which the school has handled the investigation, then you should discuss this with the Designated Safeguarding Lead (DSL).

Procedure in a case of reported bullying: advice to staff

The way that we deal with bullying will have an impact on the confidence of pupils and their parents to report bullying. It is important that we demonstrate that the bullying of any member of the school community will be taken seriously and dealt with effectively. Pupils may be reluctant to report bullying for fear of harm or because they feel that nothing can be done. We must show that we can support pupils to prevent harm, that bullying is not tolerated and that there are solutions that work.

At all times investigations must be handled sensitively. Clearly each case is different but unless there is a good reason not to do so, information provided by witnesses should be regarded as confidential to prevent against intimidation.

a) Any actual or suspected incidences of bullying must be referred to the appropriate Head of Section/Year immediately, who in turn will inform the DSL that he/she is dealing with the incident. Depending on the severity of the bullying the parents of both victim and offender may be informed. If there is reasonable cause to suspect that, as a result of bullying, a pupil is suffering, or is likely to suffer, significant harm, the school will refer its concerns to the Bury Multi Agency Safeguarding Hub (MASH).

   If the allegation is of sibling bullying the Designated Safeguarding Lead (DSL) must be informed and the matter will be dealt with in line with the school's Safeguarding Policy.

b) When an allegation of bullying is made, it must always be treated seriously. Even if bullying is not substantiated there will often be other issues which need to be addressed. Where concerns remain about a child's welfare, staff should consider whether safeguarding procedures remain appropriate even where the threshold for bullying has not been met.

c) **Official recording of bullying must not occur until there is clear evidence of bullying by applying the definition of bullying**

d) We must ensure that when dealing with victims we take careful note of their fears, allegations and complaints; victims should be encouraged to talk about their difficulties. Pupils who are bullied at School will not always be prepared to tell those in authority. Clearly trust is very important. It is perhaps not appropriate to have a rigid structure whereby pupils see one of the staff mentioned in a) above. Pupils should be encouraged to confide in whichever person they feel most comfortable with. Bullying is a sensitive issue. A risk assessment tool can be used to help identify pupils at risk of bullying and to help devise measures to reassure those pupils who have experienced (or perceive to have experienced) bullying. **See Appendix B.**

e) All investigations into bullying incidents should be thorough and involve the bully/bullies and the victim(s). Bullies and victims must be interviewed separately. In particularly serious cases at least two members of staff must be present during the interview.

f) Hear-say accounts should be taken seriously but they cannot subsequently be used as evidence. Evidence must be gathered. Witness statements should be obtained from individuals who actually

saw or heard the events, and these must be dated, timed and signed. These should ideally be written by the investigating member of staff to ensure that the evidence is clearly and logically set out. However, staff should use open questions and avoid leading questions when gathering information from witnesses/victims or offenders.

g) Incidents of cyber-bullying should be discussed with a member of IT Services to ensure that vital evidence is not lost through lack of familiarity with **electronic** means of communication.

h) When dealing with bullies we must ensure we do not exacerbate the problem. Bullies should be helped to recognise their unsociable behaviour and offered support to modify it. They should accept responsibility for the harm caused to their victim(s) and others (e.g. friends and family). They should be encouraged to take actions to begin to repair the harm caused and these should be monitored for an agreed period of time afterwards. **A restorative justice approach in cases of minor bullying is recommended if all parties agree and as an alternative to further sanctions – see Appendix A.**

Where restorative justice for minor bullying has not worked or in cases of more severe bullying, the bully will be dealt with robustly. It is probably unhelpful to specify specific punishments for specific types of bullying because circumstances differ from case to case; but where pupils do not respond to strategies to combat bullying the school will apply harsher sanctions fairly and consistently to deal with persistent and/or violent bullying. Such sanctions might include:

- Removal from the group (in class)
- Withdrawal of break and lunchtime privileges
- Detention
- Withholding participation in school trips or sports events
- Suspension from school for a specified period
- Permanent exclusion in serious cases or persistent bullying

Where bullying involves sexual harassment, physical abuse, coercive behaviour, or emotional harm, it must be reported immediately to the Designated Safeguarding Lead (DSL) or a deputy. These incidents will be managed according to the Safeguarding Policy and may meet the threshold for child-on-child abuse under KCSIE 2026.

Section C: Primary Division

1. Advice for pupils who are experiencing or witnessing bullying

If you are being bullied, or if you are aware of someone else being bullied, then you should tell your Class Teacher as soon as possible. If you feel unable to tell your Class Teacher, then you should tell any other member of staff. You should also tell your parents. You should be prepared to give details of who the bullies are, when and where the bullying takes place and if there are any other victims.

2. Advice to parents

We encourage parents to contact the school if they have any concerns regarding bullying. We recognise that bullying incidents can be extremely upsetting for parents, and you can expect your concern to be taken seriously and dealt with in a professional manner.

If your son/daughter discloses to you that they are being bullied, then you should try to get as much detailed information from them as possible. You should then contact your son/daughter's Class Teacher as soon as possible. The school will investigate the allegation and will keep you informed of the progress of the investigation. Even after the problem has been resolved your son/daughter's Class Teacher will continue to monitor the situation to ensure that there are no recurrences. If bullying is substantiated, you can expect the investigation to result in reasonable and proportionate sanctions. If at any time you are unhappy with the way in which the school has handled the investigation, then you should discuss this with the Head of Infants or Juniors

3. Procedure in a case of reported bullying: advice to staff

The way that we deal with bullying will have an impact on the confidence of pupils and their parents to report bullying. It is important that we demonstrate that the bullying of any member of the school community will be taken seriously and dealt with effectively. Pupils may be reluctant to report bullying for fear of harm or because they feel that nothing can be done. We must show that we can support pupils to prevent harm, that bullying is not tolerated and that there are solutions that work.

At all times investigations must be handled sensitively. Clearly each case is different but unless there is a good reason not to do so, information provided by witnesses should be regarded as confidential to prevent against intimidation.

a) Any actual or suspected incidences of bullying must be referred to the Designated Person of the Primary Division immediately by discussion and by completing a CPOMS Referral. The Designated Person of the Primary Division will in turn inform the Head of Infants of Juniors that he/she is dealing with the incident. Depending on the severity of the bullying, the parents of both victim and offender may be informed. If there is reasonable cause to suspect that, as a result of bullying, a pupil is suffering, or is likely to suffer, significant harm, the school will refer its concerns to the Bury Multi Agency Safeguarding Hub (MASH).
b) If the allegation is of sibling bullying the appropriate Designated Person for the victim must be informed and the matter will be dealt with in line with the school's Safeguarding Policy.

c) When an allegation of bullying is made, it must always be treated seriously. Even if bullying is not substantiated there will often be other issues which need to be addressed.

d) We must ensure that when dealing with victims we take careful note of their fears, allegations and complaints; victims should be encouraged to talk about their difficulties. Pupils who are bullied at school will not always be prepared to tell those in authority. Clearly trust is very important. It is perhaps not appropriate to have a rigid structure whereby pupils see one of the

staff mentioned in a) above. Pupils should be encouraged to confide in whichever person they feel most comfortable with.

e) All investigations into bullying incidents should be thorough and involve the bully/bullies and the victim(s). Bullies and victims must be interviewed separately. In particularly serious cases at least two members of staff must be present during the interview.

f) Hear-say accounts should be taken seriously but they cannot subsequently be used as evidence. Evidence must be gathered. Witness statements should be obtained from individuals who saw or heard the events, and these must be dated, timed and signed. These should ideally be written by the investigating member of staff to ensure that the evidence is clearly and logically set out. However, staff should use open questions and avoid leading questions when gathering information from witnesses/victims or offenders.

g) Incidents of cyber-bullying should be discussed with a member of IT Services to ensure that vital evidence is not lost through lack of familiarity with **electronic** means of communication.

h) When dealing with bullies we must ensure we do not exacerbate the problem. Bullies should be helped to recognise their unsociable behaviour and offered support to modify it. They should accept responsibility for the harm caused to their victim(s) and others (e.g., friends and family). They should be encouraged to take actions to begin to repair the harm caused and these should be monitored for an agreed period of time afterwards. **A restorative justice approach in cases of minor bullying is recommended if all parties agree and as an alternative to further sanctions – see Appendix A.**

Where restorative justice for minor bullying has not worked or in cases of more severe bullying, the bully will be dealt with robustly. It is probably unhelpful to specify specific punishments for specific types of bullying because circumstances differ from case to case, but where pupils do not respond to strategies to combat bullying, the school will apply harsher sanctions fairly and consistently to deal with persistent and/or violent bullying. Such sanctions might include:

- Removal from the group (in class)
- Withdrawal of break and lunchtime privileges
- Code of Conduct
- Withholding participation in school trips or sports events
- Suspension from school for a specified period
- Permanent exclusion in serious cases or persistent bullying

Where bullying involves sexual harassment, physical abuse, coercive behaviour, or emotional harm, it must be reported immediately to the Designated Safeguarding Lead (DSL) or a deputy. These incidents will be managed according to the Safeguarding Policy and may meet the threshold for child-on-child abuse under KCSIE 2026.

Monitoring and Review

This policy is formally reviewed on an annual basis by the Designated Safeguarding Lead (DSL) and the Senior Leadership Team.

In addition to this annual review, the DSL conducts **termly implementation reviews** to evaluate how this policy is being embedded in practice. These reviews consider:

- Recorded bullying incidents and trends
- DSL and pastoral team referrals
- Analysis by pupil group (e.g. SEND, LAC/PLAC, LGBTQ+, ethnicity, gender)
- Effectiveness of preventative education (e.g. PSHE, assemblies)
- Staff training, confidence and use of referral processes
- Pupil and parent feedback
- Restorative outcomes and re-integration processes

Findings are recorded in termly safeguarding reports and shared with the Principal, Safeguarding Governor, and SLT to inform pastoral strategy and intervention.

Policy amendments may be made mid-year if new guidance, legislation, or safeguarding trends require it.

Appendix A: RESTORATIVE JUSTICE – CONFERENCE SCRIPT EXAMPLE

STEP 1	**Welcome, as you know my name is *(staff member name)* and I have been asked to facilitate this meeting. *(Introduce participants if necessary).* I have spoken to all of you about the incident *(briefly outline what happened). (Wrongdoer name)* has admitted their part. I remind you that you are here to discuss what happened, not the character of anyone involved. I will invite you all in turn to talk about how you and others may have been affected by what happened. This will help everyone understand what needs to be done to help put things right.**
STEP 2	**START WITH WRONGDOER(S) –** I would like to start by asking …… • Can you tell us about what happened and how you became involved OR what happened? • What happened next OR what else? *(ask this until their story unfolds)* • What were you thinking at the time? • What have your thoughts been since? • How has this affected/upset you and others? • What's been the hardest thing for you?
STEP 3	**TURN TO HARMED PERSON(S)** – I would like to start by asking ……. • Can you tell us about what happened and how you became involved OR what happened? • What happened next OR what else? *(ask this until their story unfolds)* • What were you thinking at the time? • What have your thoughts been since? • How has this affected/upset you and others? • What's been the hardest thing for you?
STEP 4	**THEN ASK REMAINING PARTICIPANTS IN TURN THE SAME QUESTIONS** *(if necessary, theme in views of those not present)*
STEP 5	**GO BACK TO THE WRONGDOER(S)** – you have just heard how xxxx and others have been affected by what you did • Do you all see that harm/upset that has been caused? • Is there anything you want to say at this stage? • Do you think that something needs to be done to repair that harm/put it right?
STEP 6	**GO BACK TO THE HARMED PERSON** – What do you think needs to happen?
STEP 7	**GO BACK TO THE WRONGDOER(S)** – What do you think of what xxxx has suggested?
STEP 8	**RETURN TO PERSON HARMED AND THEN OTHER SUPPORTERS** – What do you think/feel about what has been said? – What would you like to see come out of today's meeting?
STEP 9	**RETURN TO WRONGDOER** – What do you think/feel about what has been said?

STEP 10	**M A K E C O N T R A C T**
STEP 11	**OPTIONAL QUESTIONS** – Would you do anything differently now? / What other choices could you have made? / What have you learned from the meeting?
STEP 12	**FINAL INVITATIONS TO SPEAK** – before I close the meeting is there anyone else who wishes to say or ask something?
STEP 13	**CLOSING THE MEETING** – Thank you for participating in this meeting, I hope that your time together has helped you deal with this matter.

Appendix B: Bullying Risk Assessment

Name of pupil:
Completed by:
Date produced / updated:

Background:

Risk Factor	**Likelihood** *Low / Medium / High*	**Explanation (consider patterns – times / places / people)**	**Mitigating Factor / Control measures**	**Further action required -**
Physical assault				
Verbal assault				
Intimidation				
Cyber bullying				
Prejudice Based and Discriminatory				
Peer group Isolation				
Interference of personal affects				
Risk of lower educational attainment due to effects of bullying/ perceived bullying				
Risk to mental health due to effects of bullying/ perceived				

bullying				

Appendix C: Safety planning sheet

Incident:

	Within School	Travel to/from school	Outside of school	Online
I feel safe in this area.				
I could be safe in this area				
I do not feel safe in this area				
Safety Plan – what can I do to feel safer?				

Appendix D: Bullying report form (to use if helpful for staff)- to be uploaded onto CPOMS

Personal details	
Name of person reporting incident	
Name of pupil being bullied	
Year group	
Form group	
How may we contact you? (please circle)	
At school	**At home**
Home address	
Email	
Telephone	

Incident details
What happened?
Where did the incident take place?

When did the incident occur?
Who has been suspected of bullying?
Did anyone else see the incident?
According to the victim, how often does the bullying take place?
According to the victim, how long has the bullying been going on?

Appendix E

Anti-Bullying Policy Issues and Updates

Date	Policy version	Summary of key change(s)
23/08/23	1	Additions to examples of bullying and updated language used. Additional information on school procedures and record keeping
01/09/2024	2	Update to legislation, KCSIE 2024, Additional information regarding statutory requirements and vulnerable pupils and update from; Department for Science, Innovation and Technology and Sport and UK Council for Internet Safety (2024) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
01/09/2025	3	Addresses the sharing of nudes, semi-nudes, and AI-generated (e.g. deepfake) content. Staff expected to act swiftly and escalate to DSL where appropriate. Support for vulnerable pupils: o Highlights risks to SEND, SEMH, LAC/PLAC, LGBTQ+, young carers, and pupils with a social worker. o Requires reasonable adjustments and tailored interventions. DSL escalation pathway added: o Clear instruction to refer serious or harmful bullying to the Designated Safeguarding Lead. o Aligns with Safeguarding, Child-on-Child Abuse, and Behaviour Policies. CCTV reference (optional): o Clarifies CCTV may be used in serious cases to support investigation, in line with the school's CCTV Policy and UK GDPR. Policy now reflects: KCSIE 2025 Prevent strategy reference included: o Identifies bullying with extremist or hate-based content as a safeguarding risk under Prevent.

September 2026	4	Updated to reflect Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026). Strengthened safeguarding approach to bullying through enhanced professional curiosity, pupil voice, contextual safeguarding, Family Help, multi-agency working, monitoring of vulnerable groups and alignment with Behaviour, Attendance and Mental Health policies.