The Dean Close Foundation Schools

Independent, Co-educational, Day and Boarding School

Anti-Bullying Policy
(W045)

Registered Charity No: 1086829

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THE DEAN CLOSE FOUNDATION

ANTI-BULLYING POLICY

Statement of aims and objectives

1. The Independent School Standards Regulations 2014 provide that the proprietor ensures that bullying at the school is prevented in so far as reasonably practicable, by the drawing up and implementation of an effective anti-bullying strategy.

2. A range of documents, circulars and guidance for good practice govern anti-bullying procedures within the Dean Close Foundation:

    a. Keeping Children Safe in Education 2026
    b. Preventing and tackling bullying (DfE July 2017)
    c. Cyberbullying: Advice for headteachers and school staff (DfE November 2014)
    d. Bullying at school (GOV.UK July 2015)
    e. School support for children and young people who are bullied (DfE March 2014)
    f. Behaviour in schools (DfE September 2022)
    g. Working Together: Gloucestershire Safeguarding Children Partnership Working together (2021)
    h. The Education and Inspections Act 2006, section 89
    i. Independent School Standard Regulations part 3.10, 2016
    j. The Equality Act 2010.

3. A key provision in The Equality Act 2010 is the Public Sector Equality Duty (PSED), which came into force on 5 April 2011 and covers age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Duty requires public bodies to have due regard to the need to:

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

4. Organisations that provide advice on tackling bullying and developing a schoolwide anti-bullying policy include:

    a. The Anti-Bullying Alliance (ABA)
    b. Kidscape
    c. Restorative Justice Council
    d. ChildNet International
    e. Digizen
    f. Think U Know (CEOP)
    g. The UK Council for Child Internet Safety (UKCCIS)

h. PSHE Association
i. Stonewall
j. Mencap
k. Show Racism the Red Card.

5. The Dean Close Foundation community is based upon respect, good manners and fair play. It is committed to providing a safe and caring environment that is free from disruption, violence and any form of harassment so that every one of the pupils can develop their full potential. The Foundation expects pupils to treat members of staff with courtesy and co-operation so that they can learn in a relaxed, but orderly, atmosphere. All pupils should care for and support each other.

6. The Dean Close Foundation recognises that bullying, especially if left unaddressed, can have a devastating effect on individuals. It can be a barrier to their learning and have serious consequences for their mental health. Bullying which takes place at school does not only affect an individual during childhood but can have a lasting effect on their lives well into adulthood.

7. By effectively preventing and tackling bullying, Dean Close Foundation Schools can help to create safe, disciplined environments where pupils are able to learn and fulfil their potential.

8. The Dean Close Foundation prides itself on its respect and mutual tolerance. Parents/guardians have an important role in supporting the schools in maintaining high standards of behaviour. It is essential that school and home have consistent expectations of behaviour and that they co-operate closely together.

9. This policy is available to parents of pupils and prospective pupils on our website and on request or on request and for perusal in the school offices during the school day. It is also available and known to staff and boarders, including junior and recently appointed staff.

10. Bullying, harassment, victimisation and discrimination are not tolerated in any Dean Close Foundation School.

11. The Foundation endeavours to treat all members of the school community fairly and with consideration. It is expected that pupils, teachers, support staff and parents/guardians reciprocate this towards one another. Any kind of bullying is unacceptable.

12. All staff and pupils within the Dean Close Foundation have a responsibility to promote a positive anti-bullying culture. Staff should endeavour to embed anti-bullying in all aspects of school life and should be fully aware of relevant procedures. All members of the Foundation community have a corporate responsibility to report bullying incidents and follow Foundation procedures. These aspects are covered in regular staff INSET and initial new staff induction.

13. All Dean Close Foundation Schools should be able to demonstrate the impact of anti-bullying policies and procedures. Records of bullying should indicate the impact of actions that have been taken in relation to the perpetrator, victim and other pupils.

14. Child-on-Child abuse which frequently involves an element of bullying, is also not tolerated within the Dean Close Foundation. *(See Child-on-Child Abuse Policy W055).*

Definition of bullying

15. The Department for Education states that there is no legal definition of bullying. However, it's usually defined as behaviour that is:

    a. Repeated
    b. Intended to hurt someone either physically or emotionally
    c. Often aimed at certain groups, for example because of race, religion, gender or sexual orientation

16. It takes many forms and can include:

    a. Physical assault
    b. Teasing
    c. Making threats
    d. Name calling
    e. Cyberbullying - bullying via mobile phone or online (for example email, social networks and instant messenger)

17. The Anti-Bullying Alliance definition is 'Bullying is the repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power. It can happen face to face or online'.

18. Stopbullying.gov defines cyberbullying as:

    a. Cyberbullying is bullying that takes place over digital devices like cell phones, computers, and tablets
    b. Cyberbullying can occur through SMS, Text, and apps, or online in social media, forums, or gaming where people can view, participate in, or share content
    c. Cyberbullying includes sending, posting, or sharing negative, harmful, false, or mean content about someone else
    d. It can include sharing personal or private information about someone else causing embarrassment or humiliation. Some cyberbullying crosses the line into unlawful or criminal behaviour.

19. The most common places where cyberbullying occurs are:

    a. Social Media, such as Facebook, Instagram, Snapchat, and Tik Tok
    b. Text messaging and messaging apps on mobile or tablet devices
    c. Instant messaging, direct messaging, and online chatting over the internet
    d. Online forums, chat rooms, and message boards, such as Reddit
    e. Email
    f. Online gaming communities

20. Bullying is the intentional hurting, harming or humiliating of another person by physical (including sexual), verbal (including email, social media and SMS messages), and emotional means (by excluding, tormenting or spreading malicious rumours). It can involve manipulating a third party to tease or torment

someone. It can involve complicity that falls short of direct participation. Bullying is often hidden and subtle. It can also be overt and intimidating.

21. Bullying may involve actions or comments that are racist, sexual, sexist or homophobic, which focus on religion, cultural background, disabilities or other physical attributes (such as hair colour or body shape). Bullying can happen anywhere and at any time and can involve everyone - pupils, other young people, staff and parents.

22. Bullying often occurs when there is an imbalance of power between the perpetrator and the victim. This could be because of an age, ability or protected characteristic difference.

23. The Dean Close Foundation does not recognise a 'hierarchy' of bullying. All forms of bullying will be taken equally seriously and dealt with appropriately.

24. The Dean Close Foundation understands the importance of protecting vulnerable groups such as those adopted, in care, SEND, LGBTQ+ and ethnic or religious minorities who may be more susceptible to bullying.

25. Different types of bullying include:

    a. **Physical** – hitting, kicking, spitting, pushing, tripping someone up, stealing or damaging belongings
    b. **Verbal** – name-calling, taunting, mocking, making offensive comments, insulting a person's family, threats of physical violence, spreading rumours, constantly putting a person down, malicious gossiping, spreading hurtful or untrue rumours. This also includes 'banter' which may become distressing.
    c. **Emotional/psychological** – excluding someone from a group, humiliation, threatening to do harm, producing offensive graffiti
    d. **Electronic** – inappropriate messaging and emailing, sending offensive or degrading images by phone, via the internet or on social media.

26. Cyberbullying is a different form of bullying and can happen at all times of the day, with a potentially bigger audience, and more accessories as people view and share content. *(See Youth Produced Sexual Imagery Policy W051).*

27. Specific types of bullying include:

    a. **Bullying related to race, religion or culture** – this includes colour racism, phobias about religious beliefs, mocking personal customs, prejudice against traveller or gypsy communities and hostility towards refugees and people seeking asylum
    b. **Bullying related to special educational needs or disabilities** – this includes exploiting a pupil's inability to react physically or mentally to what is happening to them, conditional friendship, and exploitative and manipulative bullying
    c. **Bullying related to appearance or health conditions** – this includes exclusion from a group because of physical appearance or health issues as well as exploitative and manipulative bullying

d. **Sexist bullying** - this includes bullying based on sexist attitudes that when expressed demean, intimidate or harm another person because of their sex or gender. These attitudes are commonly based around the assumption that women are subordinate to men or are inferior. Sexist bullying may sometimes be characterised by inappropriate sexual behaviours
e. **Sexual bullying** – this includes bullying behaviour that has a specific sexual dimension or a sexual dynamic and it may be physical, verbal or emotional/psychological. Behaviours may involve suggestive sexual comments or innuendo including offensive comments about sexual reputation; or using sexual language that is designed to subordinate, humiliate or intimidate. Sexual bullying may be seen as sexual harassment by the school
f. **Homophobic bullying** – this includes bullying that is motivated by a prejudice against lesbian, gay, transgender or bisexual people. It includes spreading rumours that someone is gay, or suggesting that something or someone is inferior and so they are 'gay'
g. **Bullying of young carers or looked-after children** – this includes all bullying related to home circumstances and arrangements
h. **Cyberbullying** – this includes all bullying related to the internet, mobile phones, social networking sites or any other form of electronic communication. It can include all the above types of bullying, but technology is the method by which the bullying is carried out. It differs from other types of bullying in that it invades home/personal space and is difficult to control once information is circulated. Repeated requests for inappropriate images via social media is a type of cyberbullying.

Bullying and Safeguarding

28. When there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm' a bullying incident should be addressed as a child protection concern under the Children Act 1989. Where this is the case, Foundation school staff should discuss with the school's Designated Safeguarding Lead and report their concerns to their Local Authority Children's Social Care and work with them to take appropriate action. *See Safeguarding and Child Protection Policy (W044).*

29. Even where safeguarding is not considered to be an issue, Foundation schools may need to draw on a range of external services via Early Help to support the pupil who is experiencing bullying, or to tackle any underlying issue which has contributed to a child engaging in bullying.

30. All bullying incidents should be recorded on CPOMS.

Criminal Law

31. Although bullying in itself is not a specific criminal offence in the UK, it is important that all Foundation staff bear in mind that some types of harassing or threatening behaviour – or communications – could be a criminal offence

32. If any member of Foundation staff feel that an offence may have been committed, they should seek assistance from the police. For example, under the Malicious Communications Act 1988, any person who sends an electronic communication which conveys a message which is indecent or grossly offensive, a threat, or information which is false and known or believed to be false by the sender, is guilty of an offence if their purpose in sending it was to cause distress or anxiety to the recipient.

33. Extreme bullying may be defined as Hate Crime which is a crime, typically one involving violence, that is motivated by prejudice on the basis of ethnicity, religion, sexual orientation, or similar grounds.

Signs of bullying

34. A pupil may display some, all or possibly none of the following signs of bullying. A persistent change in behaviour of any pupil should be investigated:

    a. An unwillingness to come to school, or a fear of attending specific lessons or going into a specific area of the school
    b. A marked change in normal routine for no apparent reason
    c. Displays of excessive anxiety, becoming withdrawn or unusually quiet
    d. May be reluctant to separate from a parent at the beginning of the day or on return to school for boarders
    e. Unusual failure to produce work, or production of work that is unusually poor or that appears to have been copied, interfered with or spoilt by others
    f. Books, bags and other possessions suddenly go missing or are damaged
    g. Is always asking for extra money or never has any money
    h. Self-confidence diminishes
    i. Frequent visits to the Health Centre with symptoms such as stomach pains, headaches or feeling 'unwell'
    j. Unexplained cuts, bruises or other injuries
    k. Frequent absence, erratic attendance, late arrival to certain lessons
    l. Using strategies to remove or absence themselves from lessons by for example frequent visits to the toilet
    m. Becomes aggressive, disruptive or unreasonable and may start to bully others
    n. Reluctance to mix in public places such as the dining hall or play areas
    o. Reluctance to use the internet or mobile 'phone and becomes nervous when a cyber-message is received
    p. Excessive use of the internet or mobile phone or an inability to ignore social media posts
    q. Threatens to run away or harm themselves or actually does
    r. Threatens or attempts to commit suicide.

35. Although there may be other causes for the above symptoms, a repetition of, or a combination of these possible signs of bullying should be investigated.

36. Pupils, parents and staff must have regard for the seriousness of bullying, in that it causes psychological and emotional damage and can include physical harm - even leading to suicide.

37. This Anti-Bullying Policy introduction dovetails with school specific behaviour policies (with support for the person being bullied as well as the person doing the bullying) and expected age-appropriate conduct in school. Sanctions for bullying will be appropriate to the incident and the age of pupils involved but in cases of severe and persistent bullying may involve exclusion.

38. Staff responsible for Anti-Bullying policy and procedure

a. Dean Close Senior School - Mrs Jacquie Davis – DSL
b. Dean Close Kingham Hill School – Mr Rob Jones - DSL
c. Dean Close Preparatory School - Mrs Emma Bailey – DSL
d. Dean Close Pre-Preparatory School – Mrs Jennifer Phillips - DSL
e. Dean Close St John's Preparatory School – Miss Lisa Duncan – DSL
f. Dean Close Airthrie School – Mr Matthew Medhurst - DSL

Bullying which occurs outside school premises

39. Foundation school staff members have the power to discipline pupils for misbehaving outside the school premises. Sections 90 and 91 of the Education and Inspections Act 2006 say that a school's disciplinary powers can be used to address pupils' conduct when they are not on school premises and are not under the lawful control or charge of a member of school staff, but only if it would be reasonable for the school to regulate pupils' behaviour in those circumstances. This may include bullying incidents occurring anywhere off the school premises, such as on school or public transport, outside the local shops, or in Cheltenham/Chepstow.

40. Online bullying that takes place away from school will also be investigated if brought to the attention of school staff. This may include comments on social media, the sharing of images and behaviours that contravene the schools' code of conduct.

41. Where bullying outside school is reported to school staff, it should be investigated and acted on.

Preventative measures

42. The Dean Close Foundation believes that the best way to tackle bullying is to try to prevent it happening in the first place. The Foundation aims to establish an ethos of good behaviour where pupils treat one another, and all members of the Foundation staff, with respect because they know it is the right way to behave.

43. Values of respect all members of the Foundation community, an understanding of the value of education and life in school, and a clear understanding of how an individual's actions can affect others permeate the whole school environment and are reinforced by staff and older pupils who set a good example to the rest.

44. The Foundation takes the following preventative measures:

    a. The Foundation policy on Anti-Bullying (and Child-on-Child Abuse) is explained to pupils, at an age appropriate level, through the form tutorial programme, PSHE, assemblies and the curriculum.
    b. Pupils' awareness of their social and moral responsibilities is encouraged and developed as they progress through each school. The PSHE and tutorial programmes in particular enforce the messages of taking care of one another and community involvement
    c. Wider aspects of bullying are discussed in other areas of the curriculum such as English, Drama and Religious Studies. The ethos of the Foundation teaches that bullying is unacceptable

d. All staff are required to read this Anti-Bullying Policy and follow the reporting procedure outlined within it
e. Staff INSET will, from time to time, be used to discuss and review anti-bullying measures. This will include consideration of particularly vulnerable groups and those with protected characteristics.
f. Where appropriate staff INSET and discussion will focus on raising awareness of the legal responsibilities of protecting pupils from bullying and how to refer a child where there is a Child Protection concern if there is reasonable cause to suspect that a child is suffering or likely to suffer, significant harm
g. The person responsible for anti-bullying measures in each school as listed in paragraph 38 give support and guidance to other staff on handling and reporting bullying incidents, and participates in the follow-up work with both person/people doing the bullying and the person being bullied
h. The duty staff in each school have a responsibility to patrol the school grounds, attend meals and be a presence on school grounds during the day. They are expected to be alert to inappropriate language or behaviour and report it accordingly
i. The boarding house teams in each school are aware of potential bullying problems and work to maintain a positive, supportive house environment. House assemblies and meetings and tutor meetings are all opportunities for the discussion of anti-bullying work and reinforcing pupil standards and values. Close contact is maintained between the houseparents and parents/guardians
j. Dean Close Foundation Schools recognise that bullying can take place within the boarding environment and are vigilant for the signs of negative behaviour that could be or develop into bullying.
k. Advice on where pupils can seek help including details of the School Wellbeing Lead, independent person and Childline are displayed in the boarding houses and throughout each school
l. All pupils have access to a telephone enabling them to call for support in private. Childline information is displayed prominently throughout the schools
m. The senior pupils in each school (as appropriate) receive training and regular meetings are held at which pupil issues are discussed.
n. Initiation ceremonies which may cause pain or anxiety are banned in Dean Close Foundation Schools
o. The Foundation reserves the right to investigate incidents that take place outside school hours, on school visits and trips and that occur in the vicinity of the school, involving any Foundation pupils and that may bring the Foundation into disrepute
p. Anti-bullying measures dovetail with individual school behaviour policies, ICT acceptable use policy and discipline and sanction procedures as well as the Foundation Safeguarding and Child Protection policy
q. The Foundation welcomes feedback from all members of the school communities on the efficacy of our anti-bullying measures
r. The Foundation recognises that bullying may form part of a wider Safeguarding issue and will be dealt with in accordance with the Foundation Safeguarding and Child Protection Policy. The DSL (Designated Safeguarding Lead) in the relevant school needs to be informed if a member of staff suspects that bullying may be a safeguarding concern
s. From time to time pupils will be asked about their experience of bullying, bullying issues that concern them and whether they feel safe at school either via a survey or through group work.
t. Involve pupils and staff in agreeing how bullying incidents will be prevented and responded to

u. Find meaningful ways to celebrate diversity and inclusivity at an age appropriate level.

Intervention
Reporting bullying

45. Bullying is not tolerated at any Dean Close Foundation school. The Foundation is committed to stopping all forms or bullying behaviour. All members of the Foundation, staff and pupils, have a responsibility to tackle and report bullying behaviour. All incidents should be reported immediately and acted upon by the person receiving the information.

46. All reports of bullying will be taken seriously.

47. Wherever possible, staff, pupils and parents will work together to support the person who is being bullied, find solutions to the situation and help the person who is bullying to adapt their behaviour. Outside agencies may be involved.

48. The individual school will apply disciplinary measures, as outlined in the school appropriate Behaviour Policy, to pupils who bully in order to show clearly that their behaviour is wrong and to encourage more positive choices in the future. Disciplinary measures will be applied fairly, consistently and reasonably taking into account special educational needs, disabilities or vulnerabilities pupils may have.

49. The individual school will also consider the motivations behind bullying behaviour and whether it reveals any concerns for the perpetrator. This may involve providing support for the pupil engaged in bullying.

50. A bullying incident will be addressed as a child protection concern if there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm'.

51. If the bullying incident is considered a child protection concern safeguarding procedures will be followed and social care may be contacted. Even where safeguarding is not considered to be an issue, the individual school may draw on a range of external services, such as Early Help, to support the pupil who is experiencing bullying, or to tackle any underlying issue which has contributed to a child engaged in bullying.

52. The Foundation reserves the right to discipline pupils for misbehaving, including bullying outside the school premises. This is particularly applicable on transport to and from school, on school trips or when representing the school off-site.

53. Although bullying is not a specific criminal offence some types of harassing or threatening behaviour or communication could be. If the individual school feels an offence has been committed assistance may be sought from the police.

54. Excluding pupils from a Foundation school is a last resort. However perpetrators of serious bullying may be suspended whilst investigations are carried out and where serious allegations are founded, asked to leave the school.

Pupil role in managing bullying

55. From time to time pupils can feel vulnerable. This may be because they are new to the school, have problems at home, have health issues or are simply not coping as well with day-to-day life.

56. All pupils have a responsibility to help other pupils who are vulnerable. This includes not allowing them to feel 'ganged up' on, making fun of them or subjecting them to inappropriate, repetitive 'banter'.

57. Where possible, bullying behaviour should be challenged at the time. If this is not possible or feasible, the incident needs to be reported. Turning a 'blind eye' is not an option.

58. If a pupil witnesses or knows about a bullying incident, they should:

    a. Fetch help from either an adult or a senior pupil if the person being bullied is in any danger. If not, they should stay with the person being bullied as their presence may ease the situation
    b. Try to show the person doing the bullying that they disapprove of their actions and give support to the person being bullied
    c. Try to persuade the person being bullied to report the incident. If they will not, report it themselves to any member of staff
    d. Try not to escalate the situation or play down what happened.

59. A pupil who is being bullied should:

    a. Explain to the person/ people doing the bullying that their words/actions are upsetting and harmful
    b. Walk away quickly and confidently, even if they don't feel that way inside
    c. Not be ashamed of being 'different' in any way – it's good to be an individual!
    d. The person doing the bullying will not stop if they think they can get away with such behaviour The person being bullied should discuss the problem with an adult or a friend and report the incident as soon as possible
    e. A bullying incident can be reported verbally to a member of staff whom the pupil trusts or electronically
    f. No one will be in trouble for reporting a bullying incident
    g. Once a bullying incident has been reported the victim will be listened to and taken seriously. Actions will be taken to help stop the bullying
    h. The person who is being bullied will be involved in the process of investigating and resolving the bullying incident. Their views will be taken into account as will any worries or concerns they have.

60. A pupil who is bullying can expect that:

    a. Their behaviour will be challenged and deemed unacceptable
    b. They will be treated fairly and that they will be given an opportunity to explain their actions
    c. They will be given a chance to change their behaviour with support from staff, older pupils and possibly outside agencies
    d. Parents will be informed of their behaviour

e. A sanction may be issued in accordance with the school's behaviour policy. This may involve suspension from school.

Staff role in managing bullying

61. All staff are expected to:

    a. Promote an environment that is constructive and safe for pupils by challenging inappropriate behaviour and supporting the principles of this policy
    b. Following the procedures laid out in this policy
    c. Work in co-operation with the school to promote an anti-bullying culture and combat bullying

62. Staff should ensure that they:

    a. Never ignore suspected bullying
    b. Do not make premature assumptions as bullying situations can be very complex
    c. Listen carefully to all accounts – several pupils saying the same does not necessarily mean they are telling the truth
    d. Adopt a problem-solving approach which moves pupils on from justifying themselves
    e. Report the incident to the tutor or housemaster/housemistress in the first instance. If it appears to be a Child Protection incident, report it to the Designated Safeguarding Lead or deputy DSL, immediately
    f. Follow-up by checking that the bullying has not resumed. This is important to ensure that any patterns can be identified
    g. Reassure victim(s) and witness(es) that they will be protected from reprisals as far as possible
    h. Ensure that the Deputy Head or another member of SLT is informed.

Parent role in managing bullying

63. Parents/Guardians can expect that:

    a. Bullying incidents will be investigated without delay and they will be informed if their child is involved in any way
    b. The Foundation and school actively promote an anti-bullying ethos and environment.

64. If a Parent/Guardian suspects their child is being bullied, they should:

    a. Try to ascertain facts about the bullying incident without causing further distress
    b. Try to establish who was involved, where when and how often the incidents have occurred and any other useful information
    c. Contact the pupil's tutor or housemaster/housemistress for an urgent discussion of the information you have obtained
    d. Reassure your child but don't let them talk you out of contacting the school. If the problem is to be solved it needs to be discussed
    e. Expect the school to remain in contact until the issue is fully resolved.

Procedures for dealing with reported bullying

65. If an incident of bullying is reported, the following procedures are adopted:

    a. The member of staff to whom it was reported or who first discovers the situation should control the situation and reassure or support the pupils involved
    b. The relevant tutor or housemaster/housemistress should be informed as soon as possible. If they are unavailable or if the incident is serious the Deputy Head should be told
    c. The person being bullied will be interviewed and a written account taken of the events they describe by the interviewer.
    d. The person/people doing the bullying, together with all others who were involved, will be interviewed and written accounts taken of the events they describe
    e. Victims, witnesses and suspected perpetrators will be offered advocacy support
    f. The incident will be recorded
    g. All should be reassured that they will be protected from reprisals as far as possible
    h. A meeting will take place between all relevant and involved staff members
    i. Further interviews with the person being bullied, the person/people doing the bullying and other involved parties may take place
    j. In most circumstances the parents/guardians of all parties will be informed and invited to the school to discuss the matter. Their support will be sought
    k. A way forward including disciplinary sanctions and counselling will be agreed and implemented
    l. A strategy will be put in place to bring the matter to a close, and to monitor and review the situation
    m. In very serious cases, after consultation with the Head, it may be necessary to make a report to the police or social care. However it is the policy of the Dean Close Foundation to attempt to resolve such issues internally under the school's own disciplinary procedures, unless the matter is of such gravity that a criminal prosecution is likely
    n. All incidents of bullying will be recorded. The records will be used to inform each school of possible patterns of bullying and will be used to inform future policy development. Senior pastoral staff in each school will from time to time examine bullying records and the patterns they contain and use them to help develop more effective anti-bullying procedures. Boarding staff will ensure that the boarding community is safeguarded from identified bullying patterns.

66. In some circumstances the consequences of bullying may lead to a pupil experiencing pronounced social, emotional or mental health difficulties. If this is the case, the individual school should ensure they make appropriate provision for a child's short term needs, including setting out what actions they are taking when bullying has had a serious impact on a child's ability to learn. If the bullying leads to persistent, long-lasting difficulties that cause the child or young person to have significantly greater difficulty in learning than the majority of those of the same age, then schools should consider whether the child will benefit from being assessed for SEN.