

ANTI-BULLYING POLICY

Reviewed: September 2026
Next Review: September 2027
Policy Owner: Deputy Head
Approved by: Gill Sommers (Safeguarding Governor)

I. Legal and Regulatory Framework

This policy has been prepared having regard to the following legislation and statutory guidance:

- The Education (Independent School Standards) Regulations 2014 (as amended), particularly Part 3 (Welfare, Health and Safety of Pupils), including Standards 7, 9 and 10.
- Education and Inspections Act 2006.
- Education Act 2011.
- Behaviour in Schools: Advice for Headteachers and School Staff (DfE)
- Suspension and Permanent Exclusion Guidance (DfE)
- Equality Act 2010.
- Children Act 1989.
- Children Act 2004.
- Children and Social Work Act 2017.
- Human Rights Act 1998.
- Data Protection Act 2018 and UK GDPR.
- Keeping Children Safe in Education (KCSIE) 2026.
- Working Together to Safeguard Children (latest edition).
- Preventing and Tackling Bullying (DfE).
- Cyberbullying: Advice for Headteachers and School Staff (DfE).
- Sharing nudes and semi-nudes: Advice for Education Settings Working with Children and Young People (UKCIS)
- Education for a Connected World Framework (UKCIS)
- Searching, Screening and Confiscation (DfE).
- National Minimum Standards for Boarding Schools (where applicable).
- Statutory Framework for the Early Years Foundation Stage (where applicable).

This policy fulfils the requirements of **Standard 10 (Bullying)** of the Education (Independent School Standards) Regulations 2014 (as amended), which requires the school to implement measures to prevent bullying, promote a culture of respect, and ensure that incidents of bullying are identified, investigated, recorded and addressed appropriately in order to safeguard and promote the welfare of pupils.

This policy should be read alongside the school's:

- Safeguarding and Child Protection Policy
- Behaviour Policy
- Online Safety Policy
- Staff Code of Conduct
- Complaints Policy

- SEND Policy
- Equality, Diversity and Inclusion Policy
- Relationships, Sex and Health Education (RSHE) Policy

This policy should also be read alongside the school's Staff Behaviour (Code of Conduct) Policy, ICT Acceptable Use Policy, Searching, Screening and Confiscation Procedures and any relevant boarding procedures where applicable.

2. Aims

The aims of this policy are to:

- Prevent bullying wherever possible through a proactive and inclusive school culture
- Ensure all pupils feel safe, supported and able to learn without fear
- Provide clear procedures for reporting, investigating and responding to bullying
- Support both pupils who experience bullying and those who display bullying behaviour
- Ensure compliance with safeguarding obligations
- Promote a culture in which all members of the school community understand that everyone has a responsibility to prevent, identify and report bullying.

Bullying of any kind is unacceptable and will be taken seriously.

The school is committed to providing a safe, respectful and inclusive environment in which every pupil can learn and thrive.

Bullying is never acceptable and will always be taken seriously. The school fulfils its duty to safeguard and promote the welfare of children by taking all allegations of bullying seriously and responding promptly, proportionately and fairly.

We recognise that bullying may constitute child-on-child abuse and can have serious safeguarding implications. All allegations or concerns will therefore be considered through both behavioural and safeguarding procedures to ensure that pupils receive appropriate protection and support.

Every member of the school community shares responsibility for promoting kindness, respect, dignity and inclusion.

The school is committed to creating an environment in which pupils feel confident to report concerns, knowing that they will be listened to, taken seriously and supported. Bullying prevention forms part of the school's wider safeguarding culture and contributes to the promotion of pupils' physical and emotional wellbeing.

3. Definition of Bullying

Bullying is behaviour by an individual or group, repeated over time, that intentionally causes physical or emotional harm to another individual or group.

Bullying is usually characterised by repeated behaviour over time. However, a single serious incident may constitute bullying and/or child-on-child abuse where its seriousness, impact or safeguarding implications justify this. Such incidents will always be considered through both behavioural and safeguarding procedures.



Bullying may involve an imbalance of power, which can be physical, psychological, social or intellectual, and may make it difficult for the victim to defend themselves.

Bullying may occur face-to-face, online, during educational visits, while travelling to or from school, during extracurricular activities or outside school where the behaviour has an impact on members of the school community or the orderly running of the school.

The school recognises that bullying may occur within wider peer groups, online communities or other environments outside the immediate control of the school. In accordance with the principles of contextual safeguarding, these wider circumstances will be considered when assessing risk, determining appropriate interventions and safeguarding pupils.

Bullying can include (but is not limited to):

- Physical (hitting, pushing)
- Verbal (name-calling, threats)
- Emotional (exclusion, intimidation, humiliation)
- Social (spreading rumours, peer isolation)
- Cyberbullying (via phones, social media, gaming platforms, images or video)

Bullying may be motivated by prejudice, including related to perceived protected characteristics under the Equality Act 2010.

This may include prejudice relating to:

- disability
- race
- religion or belief
- sex
- sexual orientation
- gender reassignment
- pregnancy or maternity

Prejudice-related bullying may amount to unlawful discrimination or harassment under the Equality Act 2010 and will therefore be treated particularly seriously. The school will take appropriate action to eliminate discrimination, foster good relations and advance equality of opportunity.

The school also recognises that pupils with SEND, looked after children, previously looked after children, young carers, pupils with medical needs and those experiencing mental health difficulties may be particularly vulnerable to bullying and will receive appropriate support.

Low-level behaviours (e.g. derogatory language or “banter”) will be challenged, as these can escalate into bullying if unaddressed.

4. Bullying and Safeguarding

The school recognises that bullying may constitute child-on-child abuse and, in some cases, may indicate that a child is suffering, or is likely to suffer, significant harm.

Staff will always consider whether bullying behaviour involves or is associated with:

- image-based abuse
- sharing indecent images
- sextortion
- coercive online behaviour
- online misogyny
- radicalisation or extremist behaviour where relevant
- sexual violence
- sexual harassment
- harmful sexual behaviour
- child-on-child abuse
- discriminatory abuse
- online abuse
- coercive or controlling behaviour
- exploitation
- abuse occurring outside school
- mental health concerns
- criminal behaviour.

When concerns arise, staff will consider whether the pupil displaying bullying behaviour may themselves require safeguarding intervention, pastoral support or assessment of unmet needs, recognising that bullying behaviour may be associated with trauma, abuse, neglect, mental health needs or other vulnerabilities.

All staff have a responsibility to report safeguarding concerns immediately to the Designated Safeguarding Lead (DSL).

Where there is reasonable cause to suspect that a pupil is suffering or is likely to suffer significant harm, safeguarding procedures will take precedence over disciplinary procedures and referrals will be made to Children's Social Care and/or the Police where appropriate. Allegations involving sexual violence or sexual harassment will normally be managed under the Safeguarding and Child Protection Policy in accordance with Keeping Children Safe in Education.

5. Prevention

The school adopts a proactive approach to preventing bullying through:

- PSHE and pastoral education
- Assemblies and curriculum content promoting respect, tolerance and inclusion
- Pupil voice initiatives and surveys
- Staff training and vigilance
- age-appropriate education about respectful relationships, consent and healthy friendships
- Clear expectations of behaviour

The school promotes a culture in which all forms of discriminatory language, prejudice, harassment, intimidation and inappropriate "banter" are challenged promptly and consistently.

Pupils are taught that bullying should be reported and will be taken seriously.

Preventative work also includes:

- Relationships, Sex and Health Education (RSHE)
- Online Safety education
- Digital Citizenship
- British Values
- restorative approaches, where appropriate and where they do not compromise safeguarding or pupil welfare
- peer support initiatives
- pupil leadership opportunities
- staff supervision of identified risk areas
- supervision during educational visits, residential trips, school transport and extracurricular activities
- regular review of pupil voice and wellbeing surveys.

Preventative work is regularly reviewed in light of safeguarding trends, pupil voice, behaviour records, bullying data and emerging local or national safeguarding risks to ensure that prevention strategies remain effective and responsive.

6. Roles and Responsibilities

Governors/Proprietor

The Governors are responsible for ensuring that appropriate policies and procedures are in place to safeguard pupils and promote their welfare.

The Governing Body receives reports on bullying patterns, safeguarding themes and the effectiveness of preventative strategies termly, and at least annually through formal safeguarding reporting, enabling appropriate challenge and oversight of pupil welfare.

Head

The Head has overall responsibility for ensuring this policy is implemented effectively throughout the school.

The Head ensures adequate resources, training and oversight are provided to support the effective implementation of this policy.

Designated Safeguarding Lead

The DSL ensures that bullying concerns with safeguarding implications are managed in accordance with the Safeguarding and Child Protection Policy.

Staff

All staff must:

- model respectful behaviour
- remain vigilant
- challenge inappropriate behaviour
- record concerns promptly
- report safeguarding concerns immediately.
- maintain appropriate records of concerns, actions taken and outcomes in accordance with school procedures.

All staff are expected to record bullying concerns, including low-level concerns, on the school's safeguarding and/or behaviour recording system in accordance with school procedures. Concerns should be recorded even where the behaviour does not ultimately meet the formal definition of bullying, as this enables the school to identify emerging patterns and risks.

Pupils

Pupils are expected to:

- treat others respectfully
- report concerns
- support peers
- avoid being passive bystanders.

Parents

Parents are encouraged to work in partnership with the school by reporting concerns promptly and supporting agreed interventions.

7. Reporting Bullying

Pupils can report concerns in the following ways:

- To any member of staff
- To their Form Tutor, House Parent or Boarding Staff
- To the Deputy Head or DSL
- Through pupil voice opportunities
- Via parents contacting the school
- Through confidential reporting systems (where available)
- Through anonymous reporting mechanisms where available. (Anonymous reports will be taken seriously. Although anonymity may limit the school's ability to investigate fully, all reasonable steps will be taken to assess and respond to concerns.)

Reports may be made by pupils, staff, parents or third parties. All reports will be listened to carefully, taken seriously and responded to in a timely, proportionate and child-centred manner. The wishes, feelings and lived experiences of the pupil will be taken into account throughout the process.

All pupils are regularly reminded that reporting bullying is safe and responsible. No pupil will suffer adverse consequences for reporting concerns.

8. Response and Investigation

All reports of bullying will be taken seriously and acted upon promptly.

- Reports will normally be acknowledged within 24 hours (during term time)
- Investigations will normally begin within one school day

The investigation process will include:

1. Recording the concern on the school's system (iSAMS)
2. Appointment of an appropriate investigator
3. Gathering accounts from all parties involved
4. Reviewing relevant evidence, including digital evidence where appropriate while preserving evidence that may be required by external agencies.
5. Assessing whether the behaviour meets the definition of bullying
6. Recording outcomes and actions, including safeguarding decisions, referrals, risk assessments and follow-up arrangements where appropriate.
7. Communicating appropriately with those involved
8. Reviewing the situation to ensure resolution

Where appropriate, risk assessments will be completed or updated to ensure that pupils remain safe during and following the investigation. Safeguarding plans, behaviour plans or support plans may also be reviewed where necessary.

Investigations will be conducted fairly, impartially and proportionately, taking account of the age, needs and vulnerability of all pupils involved.

The school recognises that investigations should be proportionate and trauma-informed. Staff will avoid unnecessarily repeating interviews with pupils and will seek to minimise distress whilst ensuring a thorough and fair investigation.

When assessing incidents, the school will consider:

- Frequency
- Intent
- Power imbalance
- Impact on the pupil
- Any link to protected characteristics

9. Outcomes and Support

Support for pupils who experience bullying:

- Regular pastoral check-ins
- Access to counselling or wellbeing support
- Adjustments to routines or environments
- Safety planning where appropriate
- agreed review meetings to monitor progress and confirm that bullying has ceased
- ongoing monitoring by pastoral staff for an appropriate period following resolution
- restorative work where appropriate
- education to address attitudes and behaviours
- support to develop empathy, respectful relationships and positive behaviour

Support for pupils displaying bullying behaviour:

- Behaviour management strategies
- Pastoral support and reflection
- Consideration of underlying needs (including SEND or mental health)
- Consideration of whether safeguarding concerns, SEND, adverse childhood experiences, family circumstances or mental health needs have contributed to the behaviour

Sanctions, where applied, will be:

- Proportionate
- Consistent
- In line with the Behaviour Policy

Serious or persistent bullying may result in suspension or permanent exclusion in accordance with the school's Behaviour Policy and current statutory guidance.

The school recognises that sanctions alone may not change behaviour and will seek to understand and address any underlying needs contributing to bullying behaviour.

Where appropriate, interventions will seek both to address unacceptable behaviour and to educate pupils about respectful relationships, empathy, inclusion and personal responsibility.

10. Recording, Monitoring and Review

The Deputy Head and DSL will analyse incidents each term to identify:

- recurring patterns
- locations

- times of day
- year groups
- boarding houses
- protected characteristics
- repeat victims
- repeat perpetrators
- online trends
- effectiveness of interventions.

Findings will be used to inform staff training, curriculum planning, pastoral support and risk assessments where appropriate.

Records will include, where appropriate:

- chronology of events
- actions taken
- safeguarding decisions
- referrals made
- communications with parents
- outcomes achieved
- follow-up reviews

The school maintains a central record of bullying concerns and outcomes. This record enables leaders to identify trends, evaluate the effectiveness of interventions, inform safeguarding practice and fulfil the school's responsibilities under the Independent School Standards.

Bullying data will be reviewed alongside safeguarding, attendance, behaviour and wellbeing information to identify emerging risks and to inform school improvement planning.

The Head and Designated Safeguarding Lead will review significant bullying incidents to identify any lessons learned and determine whether changes to policy, practice, staffing, supervision or curriculum provision are required to strengthen the school's safeguarding arrangements.

11. Staff Responsibilities

All staff must:

- Be vigilant and proactive in identifying concerns
- Take all reports seriously
- Record and report concerns promptly
- Never ignore suspected bullying
- Follow safeguarding procedures where appropriate

All staff receive training on:

- Recognising bullying and its impact
- Responding to disclosures
- Safeguarding responsibilities
- recognising indicators of child-on-child abuse
- responding appropriately to online harms
- recording concerns accurately
- maintaining professional curiosity

Staff training will be updated whenever significant changes are made to statutory safeguarding guidance, emerging safeguarding risks or school procedures. New staff receive appropriate induction before working unsupervised with pupils.

Any concerns about staff behaviour must be reported and managed in accordance with the Staff Code of Conduct and safeguarding procedures.

12. Early Intervention and Low-Level Bullying Behaviour

The school recognises that seemingly low-level behaviours may contribute to a culture in which bullying develops.

Staff are expected to challenge and, where appropriate, record incidents involving:

- sexist language
- misogyny
- racist language
- homophobic language
- transphobic language
- discriminatory comments
- humiliating behaviour
- inappropriate banter.

Repeated low-level concerns may constitute bullying and/or child-on-child abuse. Staff should intervene early to prevent inappropriate behaviour escalating into bullying or child-on-child abuse.

Staff will exercise professional curiosity when patterns of low-level behaviour emerge and will consider whether repeated incidents indicate wider safeguarding concerns, child-on-child abuse or discriminatory behaviour requiring further intervention.

13. Cyberbullying and Online Safety

Cyberbullying includes, but is not limited to:

- social media
- messaging services
- gaming platforms
- livestreaming
- anonymous messaging applications
- email
- websites
- group chats
- image sharing
- AI-generated or manipulated images
- AI-generated audio or video
- image-based abuse
- sexualised digital content
- impersonation accounts
- doxxing
- deepfakes
- location-sharing services.
- anonymous online forums
- AI chat platforms
- encrypted messaging applications
- temporary or disappearing message services
- virtual reality and immersive online environments

Bullying occurring outside school, including online, during travel to and from school, on educational visits or in the wider community, will be addressed where it affects the safety, welfare or education of members of the school community or may bring the school into disrepute.

Where appropriate, electronic devices may be searched in accordance with statutory guidance and the school's Searching and Confiscation procedures.

The school recognises that rapidly evolving technologies, including artificial intelligence, may create new opportunities for bullying and abuse. Staff will respond to emerging technologies in accordance with statutory safeguarding guidance and the school's Online Safety Policy.

Where criminal offences are suspected, evidence will be preserved and referred to the Police. The school may seek advice from Children's Social Care, the Police, the Local Authority Designated Officer (where relevant), or other agencies as appropriate.

14. Boarding

The school recognises that boarders may be more vulnerable to bullying due to extended time in the school environment.

Boarding staff receive appropriate safeguarding and anti-bullying training and ensure that boarders know how to report concerns at any time, including outside normal school hours.

Boarding staff:

- Maintain high levels of vigilance
- Monitor relationships closely
- Provide accessible support

All boarding incidents are reviewed termly in line with National Minimum Standards.

Boarding staff work closely with pastoral leaders and the Designated Safeguarding Lead to ensure that any patterns of bullying are identified promptly and addressed consistently across both boarding and day provision.

15. Early Years (where applicable)

In the Early Years Foundation Stage, any behaviour that may indicate bullying will be addressed immediately in an age-appropriate way, with a focus on supervision, support and teaching appropriate behaviour.

Staff recognise that behaviour in the Early Years Foundation Stage is often developmental in nature. Nevertheless, repeated or targeted behaviour causing distress will always be addressed promptly and appropriately.

Staff recognise that young children are still developing social and emotional skills. Any repeated behaviour causing distress will be addressed through careful supervision, positive teaching, partnership with parents and appropriate recording where required.

16. Communication with Parents

This policy is:

- Published on the school website
- Available in the Parent Handbook

Parents will normally be informed where bullying concerns involve their child, unless doing so would place a child at increased risk of harm.

The school will work collaboratively with parents wherever possible while maintaining appropriate confidentiality and fulfilling safeguarding duties.



Where safeguarding concerns require referral to Children's Social Care or the Police, the school will act in accordance with statutory safeguarding guidance.

Parents are encouraged to report concerns and will be involved where appropriate.

Wherever appropriate and safe to do so, the school will work collaboratively with parents to support both pupils experiencing bullying and pupils displaying bullying behaviour, while ensuring that safeguarding responsibilities and the welfare of all pupils remain paramount.

Where appropriate, parents of all pupils directly involved will be informed of concerns, actions taken and support provided, subject to safeguarding, confidentiality and data protection considerations.

Concerns about the handling of bullying may be raised through the Complaints Policy.

17. Confidentiality

Information relating to bullying incidents will be shared only with those who need to know in order to safeguard pupils or fulfil professional responsibilities.

Records will be maintained securely in accordance with the Data Protection Act 2018, UK GDPR and the school's data protection procedures.

Information will only be shared on a need-to-know basis, in accordance with safeguarding responsibilities, data protection legislation and the school's record retention procedures.

Information will only be shared where necessary to safeguard children, fulfil legal responsibilities or support effective management of incidents. The school will balance confidentiality with its safeguarding duties, recognising that it cannot promise absolute confidentiality where a child may be at risk of harm.

18. Policy Review

This policy will be reviewed annually by the Deputy Head, the Designated Safeguarding Lead and the Governing Body, or sooner where changes in legislation, statutory guidance, inspection requirements or school practice make this necessary.

The Governing Body will receive appropriate information regarding bullying trends and the effectiveness of the school's preventative strategies as part of its oversight of safeguarding and pupil welfare.

This policy will also be reviewed following significant safeguarding incidents, changes in legislation or statutory guidance, recommendations arising from complaints, or following learning identified through the school's safeguarding monitoring processes.