



**ST JAMES**  
Senior Girls' School

# **Anti-Bullying Policy**

---

**St James Senior Girls' School**

January 2024

## Contents

1	Aims.....	3
2	Scope and application .....	3
3	Regulatory framework .....	4
4	Responsibility statement and allocation of tasks .....	5
5	Publication and availability.....	6
6	Definitions .....	6
7	Bullying .....	6
8	Anti-bullying culture and systems .....	9
9	Reporting concerns .....	12
10	Why incidents might not be reported.....	13
11	Assessment of concerns .....	14
12	Response to concerns.....	15
13	Supporting those severely impacted by bullying .....	16
14	Training.....	17
15	Risk assessment .....	17
16	Record keeping .....	17
17	Version control .....	18

## Appendix

Appendix 1	Cyberbullying: guidance for pupils .....	19
Appendix 2	Anti-bullying organisations .....	21

## **1 Aims**

- 1.1 This is the Anti-bullying policy of St James Senior Girls' School (**School**).
- 1.2 The aims of this policy are:
  - 1.2.1 to actively promote and safeguard the welfare of pupils at the School;
  - 1.2.2 to maintain and drive a positive and supportive culture among all pupils and staff throughout the School; and
  - 1.2.3 to prevent bullying, detect it when it occurs, and respond to it appropriately on a case-by-case basis;
  - 1.2.4 to help to promote a whole school culture of openness, safety, equality and protection from all forms of harm and abuse.
- 1.3 This policy forms part of the School's whole school approach to promoting child safeguarding and well-being, which seeks to involve everyone at the school to ensure that the best interests of pupils underpins and is at the heart of all decisions, systems, processes and policies.
- 1.4 The School as a whole aims to teach the value of integrity, morality and a concern for others and to develop pupils' self-confidence and independence so that they are well-equipped to play an active role in society. The Behaviour Rewards and School Discipline Policy explicitly states that pupils should show courtesy, respect and consideration for others. All members of the school community, pupils or staff, should be free from the fear of bullying. Everyone should feel able to speak out and report any concerns about bullying in the knowledge that they will be listened to and that the matter will be investigated. Bullying has not been and will not be tolerated at the School.
- 1.5 The School recognises that bullying amongst any members of the school community is unacceptable. This covers incidents involving pupils, parents and staff – in any combination. It is the aim of this policy to help stakeholders deal with bullying issues effectively, but more importantly to work to prevent bullying taking place.
- 1.6 Although this policy is necessarily detailed, it is important to the School that our policies and procedures are transparent, clear and easy to understand for staff, pupils, parents and carers. The School welcomes feedback on how we can continue to improve our policies.

## **2 Scope and application**

- 2.1 This policy applies to the whole School
- 2.2 This policy applies at all times when the pupil is:
  - 2.2.1 in or at School (to include any period of remote provision);
  - 2.2.2 representing the School or wearing School uniform;
  - 2.2.3 travelling to or from School;
  - 2.2.4 on School-organised trips;
  - 2.2.5 associated with the School at any time;
  - 2.2.6 in the care of the School or not and the School becomes aware of an incident of bullying.

- 2.3 This policy shall also apply to pupils at all times and places in circumstances where failing to apply this policy may:
- 2.3.1 affect the health, safety or well-being of a member of the School community or a member of the public;
  - 2.3.2 have repercussions for the orderly running of the School; or
  - 2.3.3 bring the School into disrepute.

### **3 Regulatory framework**

- 3.1 This policy has been prepared to meet the School's responsibilities under:
- 3.1.1 Education (Independent School Standards) Regulations 2014;
  - 3.1.2 Education and Skills Act 2008;
  - 3.1.3 Data Protection Act 2018 and UK General Data Protection Regulation (**UK GDPR**);
  - 3.1.4 Human Rights Act 1998; and
  - 3.1.5 Equality Act 2010.
- 3.2 This policy has regard to the following guidance and advice: [*Please check the links below to ensure the guidance is up to date*]
- 3.2.1 *Keeping children safe in education* (DfE, latest version) (**KCSIE**);
  - 3.2.2 *Working together to safeguard children* (HM Government, 2018, as amended July 2022) (**WTSC**);
  - 3.2.3 *Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers* (HM Government, July 2018);
  - 3.2.4 *Preventing and tackling bullying: advice for headteachers, staff and governing bodies* (DfE, July 2017);
  - 3.2.5 *Cyberbullying: advice for headteachers and school staff* (DfE, November 2014);
  - 3.2.6 *Sexual bullying: developing effective anti-bullying practice* (Anti-bullying Alliance)
  - 3.2.7 *Sharing nudes and semi-nudes: advice for education settings working with children and young people* (DCMS and UKCIS, December 2020)
  - 3.2.8 *Searching, screening and confiscation: advice for schools* (DfE, January 2018);
  - 3.2.9 *Advice and guidance: how can we stop prejudice based bullying in schools* (Equality and Human Rights Commission);
  - 3.2.10 *Equality Act 2010: advice for schools* (DfE, June 2018);
  - 3.2.11 *Relationships education, relationships and sex education and health education guidance* (DfE, June 2019).
- 3.3 The following School policies, procedures and resource materials are relevant to this policy:
- 3.3.1 behaviour, rewards and discipline policy;
  - 3.3.2 expulsion, removal and review policy;

- 3.3.3 risk assessment policy for pupil welfare;
- 3.3.4 acceptable use policy for pupils;
- 3.3.5 E-safety policy;
- 3.3.6 safeguarding and child protection policy;
- 3.3.7 character education: PSHE (personal, social, health and economic education) and SMSC (spiritual, moral, social and cultural) policy;
- 3.3.8 policy on smoking, alcohol and the misuse of drugs and substances;
- 3.3.9 complaints policy;
- 3.3.10 policy on special educational needs and learning difficulties;
- 3.3.11 disability policy;
- 3.3.12 school rules; and
- 3.3.13 relationships and sex education policy.

#### 4 Responsibility statement and allocation of tasks

- 4.1 The Proprietor has overall responsibility for all matters which are the subject of this policy.
- 4.2 The Proprietor has nominated one of its trustees to take leadership responsibility for the School's safeguarding arrangements.
- 4.3 The Proprietor delegates some safeguarding functions to the School's Board of Governors, including the monitoring of culture and values in the School and compliance with the law, regulation and requirements of the Proprietor in relation to safeguarding. The School's Board of Governors has nominated one of its own to the role of Nominated Safeguarding Governor who takes leadership responsibility for the discharge of the Governors' safeguarding arrangements as delegated by the Board. For further information on the School's safeguarding arrangements, please see the School's Safeguarding and child protection policy and procedures.
- 4.4 To ensure the efficient discharge of its responsibilities under this policy, the Proprietor has allocated the following tasks:

Task	Allocated to	When/frequency of review
Keeping the policy up-to-date and compliant with the law and best practice	Head/ Assistant Head Pastoral (DSL)	As required, and at least termly
Monitoring the implementation of the policy, relevant risk assessments and any action taken in response and evaluating effectiveness	SLT	As required, and at least termly
Seeking input from interested groups (such as pupils, staff, Parents) to consider improvements to the School's processes under the policy	Assistant Head Pastoral (DSL)	As required, and at least annually

Task	Allocated to	When/frequency of review
Formal annual review	Proprietor	Annually

## 5 Publication and availability

- 5.1 This policy is published on the School website.
- 5.2 This policy is available in hard copy on request.
- 5.3 A copy of the policy is available for inspection from the School during the School day.
- 5.4 This policy can be made available in large print or other accessible format if required.

## 6 Definitions

- 6.1 Where the following words or phrases are used in this policy:
  - 6.1.1 References to the **Proprietor** are references to the Board of Trustees of the Independent Educational Association Limited.
  - 6.1.2 References to the **Head** may include deputies.
  - 6.1.3 References to **Parent** or **Parents** means the natural or adoptive parents of the pupil (irrespective of whether they are or have ever been married, with whom the pupil lives, or whether they have contact with the pupil) as well as any person who is not the natural or adoptive parent of the pupil, but who has care of, or parental responsibility for, the pupil e.g. legal guardian, education guardian and/or host parent/carer.

## 7 Bullying

- 7.1 Bullying is always unacceptable and will not be dismissed as being normal or as "banter", "just having a laugh", or simply "part of growing up". Bullying will not be tolerated by the School because:
  - 7.1.1 it is harmful to the person who is bullied, to those who engage in bullying behaviour, and those who support them, and can in some cases lead to lasting psychological damage and even suicide;
  - 7.1.2 it interferes with a pupil's right to enjoy their learning and leisure time free from intimidation;
  - 7.1.3 it is contrary to all our aims and values, our internal culture and the reputation of the School.
- 7.2 Bullying is behaviour by an individual or group, that intentionally hurts another individual or group either physically or emotionally. Bullying is often motivated by prejudice against particular groups. Bullying may be:
  - 7.2.1 **Physical:** hitting, kicking, pushing people around, spitting, shaking, biting, hair pulling or taking, damaging or hiding possessions;
  - 7.2.2 **Verbal:** name-calling, gossiping, taunting, teasing, insulting, threatening or undermining, humiliating or demanding money;
  - 7.2.3 **Non-verbal abuse:** hand signs or text messages (see also cyberbullying below);

- 7.2.4 **Emotional abuse:** controlling or manipulating someone, making silent, hoax or abusive calls;
- 7.2.5 **Exclusionary behaviour:** intimidating, isolating or excluding a person from a group;
- 7.2.6 **General unkindness:** constant criticism, spreading rumours or writing unkind notes, mobile phone texts or emails;
- 7.2.7 **Initiation/hazing type behaviour:** rituals which may include but is not limited to activities involving harassment, abuse or humiliation used as a way of initiating a person into a group;
- 7.2.8 **Low level disruptive behaviour:** "banter" and "horseplay" over a prolonged period of time;
- 7.2.9 **Cyberbullying:** bullying that takes place using technology. This may include bullying through the use of mobile electronic devices, social media or gaming sites. See Appendix 1 to this policy for guidance for pupils about cyberbullying. The School's separate ICT acceptable use policy for pupils sets out the School rules about the use of technology including mobile electronic devices;
- 7.2.10 **Harmful sexual behaviours:** includes sexual harassment and sexual violence:
- (a) **sexual harassment:** unwanted conduct of a sexual nature that can occur online and offline. It can include but is not limited to:
- (i) sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
  - (ii) sexual jokes or taunting;
  - (iii) physical behaviour such as deliberately brushing against someone, interfering with their clothes, displaying pictures, photos or drawings of a sexual nature;
  - (iv) online sexual harassment which may include: non-consensual sharing of sexual images and videos (sharing of nudes or semi-nudes images and videos, otherwise known as sexting or youth produced sexual imagery); inappropriate sexual comments on social media; exploitation; coercion and threats; upskirting.
- Incidences of sexual harassment will be investigated to ensure they are not part of a wider pattern of sexual harassment and/or sexual violence.
- (b) **sexual violence:** sexual offences under the Sexual Offences Act 2003, specifically rape, assault by penetration, sexual assault and causing someone to engage in sexual activity without consent.
- 7.2.11 **Prejudice-based bullying:** bullying that is motivated by actual or perceived differences between children, such as where a child is adopted, in care or has caring responsibilities; Prejudice-based bullying is taken particularly seriously.
- 7.2.12 **Discrimination-based bullying may also be:**
- sexist: related to a person's sex or gender reassignment;
  - racist, or regarding someone's religion, belief or culture;
  - related to a person's sexual orientation (homophobic bullying);

- related to pregnancy and maternity;
  - related to a person's home circumstances;
  - related to a person's disability, special educational needs, learning difficulty, health or appearance; or
  - related to a person's age.
  - LGBT-based bullying: Children who are lesbian, gay, bi, or trans (LGBT) can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or are not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff to help counter homophobic, biphobic and transphobic bullying and abuse.
- 7.3 Racial, sexual, biphobic, transphobic or homophobic bullying and bullying someone because they have a disability are also hate crimes.
- 7.4 Not all bullying is deliberate or intended to hurt. Some individuals may see their hurtful conduct as "teasing" or "a game" or "for the good of" the other person. These forms of bullying are equally unacceptable but may not be malicious and can often be corrected quickly with advice and without disciplinary sanctions. If left unchallenged or dismissed low level disruption can have a wearing, and significant impact on targeted individuals exposed to such behaviour and may lead to a culture of failing to report. This is not a culture the School adopts.
- 7.5 A person who makes a physical or sexual assault on another, or who steals or causes damage to the property of another, commits a criminal offence. Bullying may also be regarded as threatening behaviour or harassment which can be either a criminal offence or a civil wrong. Certain acts of voyeurism e.g. upskirting which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing parts of their body or clothing not otherwise visible to obtain sexual gratification, or cause the victim humiliation, distress or alarm are criminal offences. Misuse of electronic communications could also be a criminal offence, for example it is an offence to send an electronic communication (such as a text message or email) to another person with the intent to cause distress or anxiety.
- 7.6 **Safeguarding and child-on-child abuse**
- 7.6.1 Bullying is closely connected with pupil well-being and therefore will often require a safeguarding response. Bullying demonstrates a lack of respect for others which can overlap with abusive and harassing behaviour and which, in turn, can lead to a culture of unacceptable behaviours and an unsafe environment for children. All this informs the school's zero-tolerance approach, and it is essential that all staff understand the importance of challenging inappropriate behaviours between peers that are actually abusive in nature.
- 7.6.2 Child-on-child abuse can occur both inside and outside of School and may be taking place whilst not being reported. A one size fits all approach is not appropriate for all pupils, and a contextualised approach for more vulnerable pupils, victims of abuse and pupils with special educational needs and disabilities or certain medical or physical health conditions may be required. Certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", or "part of growing up" can lead to a culture of unacceptable behaviours and create an unsafe environment for pupils. In worst case scenarios, dismissing sexual harassment can lead



to a culture that normalises abuse and pupils accepting it as normal and not coming forward to report it.

7.6.3 Technology is a significant component in many safeguarding and well-being issues. Pupils are at risk of abuse online as well as face to face. This can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography.

7.6.4 In line with the School's aims and culture of openness and encouragement to report, the School's policy and procedures with regard to child-on-child abuse are set out in Appendix 3 of the School's Safeguarding and child protection policy and procedures. Concerns about a pupil's welfare because they are the victim, witness or perpetrator of bullying behaviour must be reported in accordance with the Safeguarding and child protection and safeguarding policy and procedures and appropriate action taken, taking into account the Local Safeguarding Partners' threshold document.

## **8 Anti-bullying culture and systems**

8.1 It is everyone's responsibility to ensure, whatever the circumstances, that no-one becomes a victim of bullying. A person may be vulnerable to bullying because of their age, physical appearance, nationality, colour, sex, sexual orientation, gender reassignment, religion or belief, culture or learning difficulty, disability, home circumstances or because they are new in the School, appears to be uncertain or has no friends. They may also become a target because of an irrational decision by someone who bullies them

8.2 Our expectation of all members of the School community is that:

8.2.1 everyone will uphold the School rules;

8.2.2 a pupil or a member of staff or volunteer who witnesses or hears of an incident of bullying will report it in accordance with the terms of this policy;

8.2.3 a complaint of bullying will always be taken seriously;

8.2.4 no-one will tolerate unkind actions or remarks or stand by when someone else is being bullied.

8.3 In School and in every year group:

8.3.1 discriminatory and offensive words and behaviour are treated as unacceptable;

8.3.2 positive attitudes are fostered towards people with any protected characteristic including those who are disabled and towards ethnic, religious, cultural and linguistic groups within and outside the School;

8.3.3 positive attitudes are fostered towards gender and sexuality differences through the curriculum and tutorials; and

8.3.4 incidents of bullying which are based on protected characteristics will be distinguished in the School's records.

### **8.4 Proprietor**

8.4.1 The Proprietor has overall responsibility for promoting and safeguarding the welfare of pupils at the School, ensuring that those in leadership and management positions actively promote pupil well-being. This includes ensuring that policies and procedures are in place and implemented effectively to:

- (a) minimise the risk of bullying at the School so that pupils and staff feel safe and secure;
- (b) intervene early in low-level disruption to prevent negative behaviours escalating;
- (c) deal swiftly with allegations and incidents of bullying at the School so that pupils and staff feel confident that all incidents will be dealt with appropriately;
- (d) consider incidences of sexual harassment in broad terms so that it is challenged in order to prevent the normalisation of behaviours which can provide an environment that may lead to sexual violence.

8.4.2 Please see paragraph 4.3 and the School's Safeguarding and child protection policy and procedures for further details on the School's Safeguarding arrangements.

## 8.5 Staff

8.5.1 Through their training and experience, members of staff and volunteers are expected to promote an anti-bullying culture by:

- (a) celebrating achievement;
- (b) anticipating problems and providing support;
- (c) adopting a proactive interactive approach to bullying by gathering intelligence about issues between pupils which might provoke conflict and developing strategies to prevent bullying occurring in the first place;
- (d) disciplining perpetrators fairly, consistently and reasonably, taking into account any special educational needs or disabilities of the pupil, taking into account the motivations and any underlying safety concerns of the perpetrator and providing support as appropriate;
- (e) being alert to the fact that some victims, witnesses and perpetrators may themselves be vulnerable to bullying or harassment following any report of sexual violence or sexual harassment;
- (f) making opportunities to listen to pupils;
- (g) acting as advocates of pupils;
- (h) exercising professional curiosity and knowing what to look for in order to detect abuse and to identify children who may be in need of help or protection;
- (i) reporting concerning behaviour in accordance with the provisions outlined in this policy, adopting a "it could happen here" approach.

8.5.2 Members of staff and volunteers are vigilant at all times but particularly:

- (a) at the start and end of the school day when pupils arrive and leave the site;
- (b) before lessons;
- (c) in the queue for the refectory and in the refectory itself;
- (d) in School corridors; and
- (e) on School transport/School trips.

- 8.5.3 Bullying is regularly discussed in staff meetings. The result of these meetings is to feedback information about friendship patterns, particular incidents, any pupil who seems to be isolated, any growing "power base" and any known conflict between pupils so that strategies can be developed to prevent bullying incidents.
- 8.5.4 Anti-bullying is an agenda item at regular meetings chaired by either the DSL or Deputy Head as well as part of the Safeguarding Agenda on Senior Management Team meetings.

## 8.6 Pupils

- 8.6.1 Through the School's pastoral care systems, pupils are informed and taught that bullying will not be tolerated in the School. They are encouraged:
- (a) to celebrate the effort and achievements of others;
  - (b) to hold and promote positive attitudes;
  - (c) to feel able to share problems with staff;
  - (d) to turn to someone they trust, if they have a problem;
  - (e) not to feel guilty about airing complaints;
  - (f) to be kind, considerate and tolerant towards others;
  - (g) to be aware of the impact their behaviour can have on others;
  - (h) to challenge their peers if they are unkind to others;
  - (i) to celebrate the diversity of others;
  - (j) to use technology safely and securely and to be aware of the risks and impact of the use of technology on themselves and others.
- 8.6.2 Measures are taken throughout each year to educate pupils about bullying and this policy. These measures include:
- (a) the character education and relationships and sex education curriculum includes lessons on bullying;
  - (b) the School community will challenge stereotypical opinions so negative views are not perpetuated e.g. misogyny;
  - (c) anti-bullying posters placed around the School;
  - (d) anti-bullying messages are given in assemblies;
  - (e) anti-bullying weeks;
  - (f) online safety is a key aspect of all areas of the curriculum. Parents are informed about online safety issues and the School's strategies to safeguard pupils through correspondence and annual events held by the School to raise awareness. See the School's E-safety policy for further information about the School's online safety strategy;
  - (g) making use of assemblies, form time, drama and literature to discuss the differences between people and the importance of avoiding prejudice based language; and

(h) the Equity, Diversity and Inclusivity student committee (EDI) and the Skittles/Alliance group meet fortnightly to discuss diversity and inclusion issues, to promote understanding and help raise awareness of bullying and discrimination.

(i) the use of restorative approaches to deal with bullying

8.6.3 The School recognises that children with special educational needs and disabilities and certain medical or physical health conditions can face additional safeguarding challenges, including the potential to be disproportionately impacted by behaviours such as peer group isolation bullying, without outwardly showing any signs. The School will consider extra pastoral support for pupils with special educational needs and disabilities, as required.

8.6.4 The Well-beans are a group of pupils and prefects committed to the promotion of good relationships and emotional well-being. The group meets every week with the Assistant Head Pastoral (DSL). The aims of the group are:

(a) to improve communication, understanding and relationships within the School;

(b) to encourage self-confidence, self-esteem, compassion and tolerance;

(c) to train pupils to become independent and assertive;

(d) to put into practice our anti-bullying policy;

(e) to help pupils to understand the range of forms that bullying takes (including cyberbullying), to recognise when it is happening and to take action to stop it.

## 8.7 Parents

8.7.1 The School will take active measures to promote an anti-bullying culture and make it clear to parents that bullying amongst pupils or towards staff will not be tolerated by the School.

## 9 Reporting concerns

### 9.1 Pupils

9.1.1 A pupil who is being bullied, or who is worried about another pupil being bullied, including cyberbullying and bullying outside school, should tell someone without delay and can do so in several ways. They can:

(a) tell their parents, Head of Section/Head of Year, Form Tutor, School Nurse or any member of staff or volunteer at the School or responsible older pupil such as a Sixth Form prefect or Mental Health First Aid Champion;

(b) ask to be referred to the School Wellbeing Coach for advice.

(c) there are “questions, suggestions and concerns” boxes outside each of the Heads of Years and Senior Leadership Team offices where pupils can report anonymously or identify themselves if they wish.

(d) contact the NSPCC Helpline (0808 800 5000) or Childline (0800 1111).

### 9.2 Parents

9.2.1 Parents who are concerned that their child is being bullied should inform an appropriate person without delay. In most cases this will be the Head of Section/Head

of Year but, where there is a cause for serious concern, or if the problem continues, the Head should be informed.

### 9.3 Staff

- 9.3.1 A member of staff or volunteer who learns of alleged bullying behaviour should:
- (a) respond quickly and sensitively by offering advice, support and reassurance to the alleged victim;
  - (b) listen carefully and keep an open mind;
  - (c) refer to 'unkind behaviour' rather than the 'bully' when speaking with the pupils concerned and state why the behaviour is unacceptable;
  - (d) not ask leading questions;
  - (e) reassure the child but not give a guarantee of confidentiality;
  - (f) report the allegation to the pupil's Head of Section/Head of Year as soon as possible;
  - (g) record the incident on CPOMS and link in any other pupils involved, including witnesses, date, time and place and giving brief details of any injuries suffered; and
  - (h) ensure that the child is safe to resume their lesson or activity.
- 9.3.2 The pupil's Head of Section/Head of Year must inform the Deputy Head or Assistant Head Pastoral (DSL) and contact the relevant Form Tutor to agree on a strategy for dealing with the matter. The Head must be notified of any alleged bullying.
- 9.3.3 Cases of suspected bullying will be investigated thoroughly and carefully. All those involved will be given the opportunity to talk about the matter with an appropriate person who will then take the necessary action. A record of the investigation and its outcome will be made in accordance with section 16. The School will try to identify and take action in relation to any patterns of bullying behaviour.
- 9.3.4 The Head of Section/Head of Year will ensure that the record of the incident and any action taken, including notification of parents, is stored on the pupils' file on CPOMS so that patterns can be identified over time.
- 9.3.5 If the alleged bullying behaviour raises a safeguarding concern, the matter should be reported in accordance with the School's Safeguarding and child protection policy and procedures before further investigation is carried out. In the case of bullying by way of potentially involving harmful sexual behaviours, staff will follow the guidance set out in Part 5 of KCSIE.
- 9.3.6 This policy focuses mainly on the bullying of pupils by pupils (i.e. child-on-child) although it is recognised that a staff member could be a victim of and on occasion may be perceived to be the perpetrator of bullying behaviour. The bullying of staff, whether by pupils, parents or other colleagues, is unacceptable. Staff members who are concerned about being bullied or harassed should refer to the School's Staff Handbook. Pupils and parents who feel that a member of staff is bullying should report this in accordance with the procedures set out above.

## 10 Why incidents might not be reported

- 10.1 There are many reasons why a pupil who has suffered bullying may be reluctant to report it. They may become demoralised and may think, for example:

- 10.1.1 it is telling tales;
  - 10.1.2 they won't believe me because the person I am complaining about is popular and I am not, and I will become even more unpopular;
  - 10.1.3 the things they are saying and doing are too embarrassing to discuss with an adult;
  - 10.1.4 it is all my fault anyway for being overweight/too studious etc;
  - 10.1.5 there are too many of them; there is nothing the staff can do;
  - 10.1.6 it will get back to my parents and they will think less of me;
  - 10.1.7 I will just try and toughen up and grow a thicker skin;
  - 10.1.8 I will lie low and not draw attention to myself;
  - 10.1.9 this is a normal part of growing up and going to school.
- 10.2 There are also reasons why a pupil who has witnessed or learned of bullying behaviour may not want to make a report. They may think:
- 10.2.1 it is "grassing" and I will become unpopular;
  - 10.2.2 it is not my concern anyway;
  - 10.2.3 I don't like the victim and I would find it embarrassing to be associated with him/her.
- 10.3 Any of these responses would be contrary to our culture at the School. When we implement this policy, we encourage every pupil (and their parents) to understand that:
- 10.3.1 every complaint of bullying will be taken seriously;
  - 10.3.2 members of staff and volunteers will deal with a complaint correctly and effectively in accordance with their experience and the training they have received;
  - 10.3.3 there is a solution to nearly every problem of bullying;
  - 10.3.4 a pupil who complains will receive support and advice and in many cases the problem can be dealt with on a no-names basis;
  - 10.3.5 the primary aim will be for the bullying to cease, not the punishment of the bully unless this is necessary;
  - 10.3.6 we may need to support the bully as well so we can address the causes of bullying behaviour.

## **11 Assessment of concerns**

- 11.1 The pupil's Head of Section/Head of Year will normally see the victim and (unless the case is very serious) any witnesses without delay and form an initial view of the allegation. The assessment will consider:
- 11.1.1 the nature of the incident(s): physical? sexual? verbal? exclusionary? discriminatory? etc.
  - 11.1.2 is it a "one-off" incident involving an individual or a group?
  - 11.1.3 is it part of a pattern of behaviour by an individual or a group?
  - 11.1.4 has physical injury been caused?

- 11.1.5 who should be informed: Head? Parents? the School's Designated Safeguarding Lead? children's social care? the police?
- 11.1.6 can the alleged bully be questioned without disclosing the victim's identity?
- 11.1.7 what is the likely outcome if the allegation proves to be correct?
- 11.2 At this stage, the possible outcomes for an incident which is not too serious include:
  - 11.2.1 there has been a misunderstanding which can be explained sympathetically to the alleged victim with advice to the alleged bully; or
  - 11.2.2 the complaint is justified in whole or in part, and further action will be needed.
- 11.3 If at any stage the alleged bullying behaviour raises a safeguarding concern, the School's Safeguarding and child protection policy and procedures should be followed before further investigation is carried out. This will be the case when there is reasonable cause to believe that a child is suffering or likely to suffer significant harm or where consensual or non-consensual sharing nude or semi-nude images or videos sexting or other harmful sexual behaviours are involved. Where bullying allegedly involves youth produced sexual imagery, staff will not view or forward sexual imagery reported to them and will follow the School's policy on sharing consensual or non-consensual nude and semi-nude images as set out in Appendix 1 of the School's Safeguarding and child protection policy and procedures.
- 11.4 Otherwise, in cases where the pupil's Head of Section/Head of Year believes that serious bullying behaviour has occurred involving a pupil or has recurred after warnings have been given to the "bully" he/she will refer the matter to the Deputy Head, Assistant Head Pastoral (DSL).
- 11.5 The Deputy Head/ Assistant Head Pastoral (DSL) will:
  - 11.5.1 interview the alleged victim, bully and any witnesses separately, in order to establish the facts of the case. He/she may decide to ask another senior member of staff to be present; and
  - 11.5.2 send a summary of his/her findings to the Head and other relevant staff.
- 11.6 Together with the Head, the Deputy Head/Assistant Head Pastoral (DSL) will decide on the action to be taken in accordance with this policy.
- 11.7 The Head will notify the parents of the victim and bully giving them details of the case and the action being taken. Such action may include further investigation and action in accordance with the School's behaviour, rewards and discipline policy.

## **12 Response to concerns**

- 12.1 When a complaint of bullying behaviour is upheld, the range of responses may include one or more of the following:
  - 12.1.1 consideration as to whether the bullying incident should be addressed as a safeguarding concern and if so, the School's Safeguarding and child protection policy and procedures will be followed;
  - 12.1.2 advice and support for the victim and, where appropriate, establishing a course of action to help the victim, including support from external services where appropriate;
  - 12.1.3 advice and support to the bully in trying to change their behaviour. This may include clear instructions and a warning or final warning;



- 12.1.4 consideration of the motivation behind the bullying behaviour and whether external services should be used to tackle any underlying issues of the bully which contributed to the bullying behaviour. If these considerations give rise to safeguarding concerns relating to the bullying, the School's child protection procedures will be followed;
  - 12.1.5 a supervised meeting between the bully and the victim to discuss their differences and the ways in which they may be able to avoid future conflict (only with the victim's express agreement) through a restorative approach;
  - 12.1.6 a disciplinary sanction against the bully, in accordance with the School's behaviour and discipline policy. In a very serious case or a case of persistent bullying, a pupil may be required to leave the School permanently in accordance with the School's behaviour and discipline policy. Any disciplinary action will be applied fairly, consistently and reasonably, taking into account any special educational needs or disabilities and the needs of vulnerable pupils;
  - 12.1.7 action to break up a "power base";
  - 12.1.8 confiscation of mobile electronic devices, increased monitoring procedures or limiting access to the School's internet and email facilities if cyberbullying (see also the School's ICT acceptable use policy for pupils);
  - 12.1.9 moving either the bully or victim to another form group after consultation with the pupil, their parents and the relevant staff;
  - 12.1.10 involving children's social care or the police;
  - 12.1.11 notifying the parents of one or both pupils about the case and the action which has been taken;
  - 12.1.12 notifying external agencies where appropriate;
  - 12.1.13 such other action as may appear to the Head to be appropriate.
- 12.2 The position should be monitored for as long as necessary thereafter. Action may include:
- 12.2.1 sharing information with some or all colleagues and with pupils in the Form/Year so that they may be alert to the need to monitor certain pupils closely;
  - 12.2.2 wellbeing coaching sessions and support;
  - 12.2.3 vigilance;
  - 12.2.4 mentioning the incident at meetings of staff;
  - 12.2.5 reviewing vulnerable individuals and areas of the School.

### **13 Supporting those severely impacted by bullying**

- 13.1 The School recognises that removing bullied pupils from school is disruptive and can make it difficult to reintegrate. The School understands in some circumstances, however, the consequences of being bullied may have had a severe impact on a pupil's social, emotional or mental health and may have impacted seriously on a pupil's ability to learn.
- 13.2 The School will do all that is reasonably possible to ensure bullied pupils continue to attend school and maintain their educational progression by putting in place proportionate short term alternative on-site provision plans where necessary.



- 13.3 If the pupil is considered to have significantly greater difficulty learning than the majority of those the same age because of the impact of the bullying, the School will consider whether the pupil will benefit from being assessed for special educational needs.

## **14 Training**

### **14.1 Staff**

14.1.1 The School ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff (including governors) and volunteers understand what is expected of them by this policy and have the necessary knowledge and skills to carry out their roles especially:

- (a) having an understanding of the groups who may be more vulnerable to bullying;
- (b) awareness of the risk and indications of bullying, and how to deal with cases;
- (c) awareness of the risks of child-on-child abuse including sexual violence and sexual harassment and how bullying may give rise to safeguarding concerns.

14.1.2 The level and frequency of training depends on the role of the individual member of staff.

14.1.3 The School maintains written records of all staff training.

### **14.2 Pupils**

14.2.1 We emphasise to older pupils the role which is expected of them in setting a good example and being helpful to younger pupils and each other. Sixth Form Prefects carry out break time and lunchtime duties supervising younger pupils. We also have a House buddy system where all younger pupils have a buddy in Year 10 and above.

14.2.2 Prefects receive safeguarding training on recognising bullying behaviour and child-on-child abuse and ensuring that they use their position effectively.

## **15 Risk assessment**

15.1 Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed and appropriate action will be taken to reduce the risks identified.

15.2 The format of any such risk assessment may vary and may be a stand-alone document or recorded on the School's electronic safeguarding management system. It may be included as part of the School's overall response to a welfare issue and include the use of individual pupil welfare plans (such as behaviour, healthcare and education plans, as appropriate). Regardless of the format used, the School's approach to promoting pupil welfare will be systematic and pupil focused.

15.3 The Head has overall responsibility for ensuring that matters which affect pupil welfare are adequately risk assessed and for ensuring that the relevant findings are implemented, monitored, evaluated and reviewed.

15.4 Day to day responsibility to carry out risk assessments under this policy will be delegated to DSL Team who have been properly trained in, and tasked with, carrying out the particular assessment.

## **16 Record keeping**

16.1 All records created in accordance with this policy are managed in accordance with the School's policies that apply to the retention and destruction of records.

- 16.2 School staff maintain records of the welfare and development of individual pupils. Every complaint or report of bullying is recorded centrally and monitored to enable patterns to be identified, both in relation to individual pupils and across the school as a whole and to evaluate the effectiveness of the School's approach.
- 16.3 The Assistant Head Pastoral (DSL) will maintain a centralised record of all allegations or reports of bullying, including details of those involved and the action taken.
- 16.4 The Assistant Head Pastoral (DSL) will monitor the centralised record of bullying incidents on a regular basis to identify patterns in behaviour and the effectiveness of the School's anti-bullying procedures which are discussed at SLT meetings.
- 16.5 The records created in accordance with this policy may contain personal data. The School has a number of privacy notices which explain how the School will use personal data. The School's approach to data protection compliance is set out in the data protection policy. In addition, staff must ensure that they follow the School's data protection policies and procedures when handling personal data created in connection with this policy.

## 17 Version control

<b>Signed by:</b>	<b>Annabel Lubikowski</b> <b>Chair of Governors</b>
Date of adoption of this policy	1 September 2022
Date of last review of this policy	January 2024
Date for next review of this policy	September 2024
Policy owner (SMT)	Deputy Head
Policy owner (Proprietor)	Chair of the Board of Governors

## Appendix 1 Cyberbullying: guidance for pupils

- 1 The Department for Education's guidance *Preventing and Tackling Bullying; Advice for headteachers, staff and governing bodies* (July 2017) states that 'The rapid development of, and widespread access to, technology has provided a new medium for 'virtual' bullying, which can occur in or outside school. Cyber-bullying 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 forward on content at a click.'
- 2 Cyberbullying is bullying that takes place using technology.
  - 2.1 It can take the form of many behaviours including:
    - a) harmful messages (text, instant, multimedia, email)
    - b) impersonating another person online
    - c) sharing private messages
    - d) uploading photographs or videos of another person that leads to shame and embarrassment
    - e) creating hate websites/social media pages
    - f) excluding people from online groups.
- 3 Pupils should remember the following:
  - 3.1 use the security settings when using technology;
  - 3.2 regularly change your password and keep it private;
  - 3.3 always respect others - be careful what you say online and what images you send;
  - 3.4 think before you send - whatever you send can be made public very quickly and could stay online forever;
  - 3.5 if you or someone you know are being cyberbullied, tell someone. You have the right not to be harassed or bullied online. Tell an adult you trust - your parents, any member of staff or volunteer, or a helpline such as the NSPCC Helpline (0808 800 5000) or ChildLine on 0800 1111;
  - 3.6 don't retaliate or reply online;
  - 3.7 save the evidence - learn how to keep records of offending messages, pictures or online conversations. Ask someone if you are unsure how to do this. This will help to show what is happening and can be used by the School to investigate the matter;
  - 3.8 block the bully. Most social media websites and online or mobile services allow you to block someone who is behaving badly;
  - 3.9 don't do nothing - if you see cyberbullying going on, support the victim and report the bullying.
- 4 You may find the following websites helpful:
  - 4.1 <http://www.childnet.com/young-people>
  - 4.2 <https://www.thinkuknow.co.uk/>
  - 4.3 <https://www.childline.org.uk/Explore/Bullying/Pages/online-bullying.aspx>

- 4.4 <https://www.saferinternet.org.uk/advice-centre/young-people>
  - 4.5 <http://www.safetynetkids.org.uk>
  - 4.6 <https://www.ceop.police.uk/Safety-Centre/How-can-CEOP-help-me-YP/>
  - 4.7 <https://www.bbc.com/ownit>
- 5 Please see the School's ICT acceptable use policy for pupils which sets out the School rules about the use of technology including mobile electronic devices. Internet safety measures (including use of filters and monitoring of usage and mobile technology) are set out in the School's E-safety policy and ICT acceptable use policy.<sup>1</sup>

For further information and guidance about cyberbullying and e-safety, please see the Department of Education's *Advice for parents and carers on cyberbullying* (November 2014). Appendix 2 to this policy contains helpful links to other departmental advice and guidance

## Appendix 2 Anti-bullying organisations

### Specialist organisations

The Anti-Bullying Alliance (ABA): Founded in 2002 by NSPCC and National Children's Bureau, the Anti-Bullying Alliance (ABA) brings together over 100 organisations into one network to develop and share good practice across the whole range of bullying issues.

<https://www.anti-bullyingalliance.org.uk/>

The ABA has also put together a fact sheet outlining the range of support that is available to schools and young people from the anti-bullying sector which can be accessed here.

<https://anti-bullyingalliance.org.uk/tools-information>

The Diana Award: Anti-Bullying Ambassadors programme to empower young people to take responsibility for changing the attitudes and behaviour of their peers towards bullying. It will achieve this by identifying, training and supporting school anti-bullying ambassadors.

<http://diana-award.org.uk/>

Kidscape: Charity established to prevent bullying and promote child protection providing advice for young people, professionals and parents about different types of bullying and how to tackle it. They also offer specialist training and support for school staff, and assertiveness training for young people.

<https://www.kidscape.org.uk/>

The BIG Award: The Bullying Intervention Group (BIG) offer a national scheme and award for schools to tackle bullying effectively.

<https://www.bullyinginterventiongroup.co.uk/index.php>

Restorative Justice Council: Includes best practice guidance for practitioners 2011.

<https://restorativejustice.org.uk/restorative-practice-schools>

### Cyber-bullying and online safety

ChildNet International: Specialist resources for young people to raise awareness of online safety and how to protect themselves. Website specifically includes new cyberbullying guidance and a practical PSHE toolkit for schools.

<http://www.childnet.com/>

<http://www.childnet.com/our-projects/cyberbullying-guidance-and-practical-toolkit>

Digizen: provides online safety information for educators, parents, carers and young people.

<http://www.digizen.org/>

Internet Matters: provides help to keep children safe in the digital world.

<https://www.internetmatters.org/>

Think U Know: resources provided by Child Exploitation and Online Protection (CEOP) for children and young people, parents, carers and teachers.

<https://www.thinkuknow.co.uk/>

The UK Council for Child Internet Safety (UKCCIS) has produced a range of resources for schools, colleges and parents about how to keep children safe online, this includes advice for schools and colleges on responding to incidents of 'sexting.'

<https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>

## **LGBT**

Barnardo's: through its LGBTQ Hub, offers guidance to young people, parents and teachers on how to support LGBT pupils and tackle LGBT prejudice-based bullying.

[http://www.barnardos.org.uk/what\\_we\\_do/our\\_work/lgbtq.htm](http://www.barnardos.org.uk/what_we_do/our_work/lgbtq.htm)

EACH: (Educational Action Challenging Homophobia): provides a national Freephone Actionline for targets of homophobic or transphobic bullying and training to schools on sexual orientation, gender identity matters and cyber homophobia.

<http://www.eachaction.org.uk/>

Metro Charity: an equality and diversity charity, providing health, community and youth services across London, the South East, national and international projects. Metro works with anyone experiencing issues related to gender, sexuality, diversity or identity.

<https://www.metrocentreonline.org/>

Proud Trust: helps young people empower themselves to make a positive change for themselves and their communities through youth groups, peer support, delivering of training and events, campaigns, undertaking research and creating resources.

<https://www.theproudtrust.org/>

Schools Out: Offers practical advice, resources (including lesson plans) and training to schools on LGBT equality in education.

<http://www.schools-out.org.uk/>

## **SEND**

Mencap: Represents people with learning disabilities, with specific advice and information for people who work with children and young people.

<https://www.mencap.org.uk/>

Changing Faces: Provide online resources and training to schools on bullying because of physical difference.

<https://www.changingfaces.org.uk/Home>

Cyberbullying and children and young people with SEN and disabilities: Advice provided by the Anti-Bullying Alliance on developing effective anti-bullying practice.

<https://anti-bullyingalliance.org.uk/tools-information/all-about-bullying/online-bullying/online-bullying-and-sendisability>

Anti-bullying Alliance SEND programme of resources: Advice provided by the Anti-bullying Alliance for school staff and parents on issues related to SEND and bullying.

<https://anti-bullyingalliance.org.uk/tools-information/all-about-bullying/at-risk-groups/sen-disability>

Information, Advice and Support Service Network: Every Local area has an information, advice and support service, providing information, advice and support to disabled children and young people, and those with SEN, and their parents.

<https://councilfordisabledchildren.org.uk/>

### **Mental health**

MindEd: Provides a free online training tool for adults that are also available to schools. It can be used to help school staff learn more about children and young people's mental health problems. It provides simple, clear guidance on mental health and includes information on identifying, understanding and supporting children who are bullied.

<https://www.minded.org.uk/>

PSHE Association – guidance and lesson plans on improving the teaching of mental health issues.

<https://www.pshe-association.org.uk/>

### **Race, religion and nationality**

Anne Frank Trust: Runs a school's project to teach young people about Anne Frank and the Holocaust, the consequences of unchecked prejudice and discrimination, and cultural diversity.

<https://www.annefrank.org.uk/Listing/Category/our-schools-programme>

Educate Against Hate: provides teachers, parents and school leaders practical advice and information on protecting children from extremism and radicalisation.

<https://educateagainsthate.com/>

Show Racism the Red Card: Provide resources and workshops for schools to educate young people, often using the high profile of football, about racism.

<http://www.theredcard.org/educational>

Kick It Out: Uses the appeal of football to educate young people about racism and provide education packs for schools.

<http://www.kickitout.org/>

Tell MAMA: Measuring Anti-Muslim Attacks (MAMA) allows people from across England to report any form of Anti-Muslim abuse, MAMA can also refer victims for support through partner agencies.

<https://tellmamauk.org/>

Anti-Muslim Hatred Working Group: Independent members of this group are representatives from the Muslim community and will assist and advice on all relevant issues.

<https://www.gov.uk/government/groups/anti-muslim-hatred-working-group>

### **Sexual harassment and sexual bullying**

Ending Violence Against Women and Girls (EVAW): A Guide for Schools. This guide from the End Violence Against Women Coalition sets out the different forms of abuse to support education staff to understand violence and abuse of girls, warning signs to look for, and how to get your whole school working towards preventing abuse.

<https://www.endviolenceagainstwomen.org.uk/>

Disrespect No Body: a Home Office led campaign which helps young people understand what a healthy relationship is. This website includes teaching materials to be used in the classroom.

<https://www.gov.uk/government/publications/disrespect-nobody-campaign-posters>

Anti-bullying Alliance: advice for school staff and professionals about developing effective anti-bullying practice in relation to sexual bullying.

<https://anti-bullyingalliance.org.uk/tools-information/all-about-bullying/sexual-and-sexist-bullying>