



Anti-Bullying Policy

Reviewed by:	Henrietta Jordan, Schools Director
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Introduction

Our schools are committed to providing a supportive, caring, and safe environment in which all learners are free from the fear of being bullied. We take bullying and its impact seriously. Bullying of any form is not tolerated in our schools, whether carried out by a learner or an adult.

Staff, learners and parents or carers will be made aware of our school's position on bullying. Bullying behaviour is unacceptable in any form. Our schools have high expectations of outstanding behaviour, and we consistently challenge any behaviour that falls below this. Anyone who knows that bullying is happening is expected to tell a member of staff.

Any learner who is a victim of bullying will be dealt with in a sympathetic manner. If bullying is suspected or reported, the incident will be dealt with immediately by the member of staff informed and then discussed with the school principal. A clear account of the incident will be recorded in the behaviour log. All staff will be informed so that close monitoring of the victim and bully can begin. Parents of both parties will be informed.

Policy Status and Legal Framework

This policy is the school's written anti-bullying strategy for the purposes of paragraph 10 of the Education (Independent School Standards) Regulations 2014. The proprietor must ensure that bullying is prevented, so far as reasonably practicable, through the drawing up and effective implementation of an anti-bullying strategy.

This policy is intended for use from 1 September 2026 and has been prepared with reference to the following legislation and guidance:

- [Education \(Independent School Standards\) Regulations 2014, particularly paragraphs 10 and 32\(3\)\(d\)](#)
- [Independent school standards guidance, April 2026](#)
- [Keeping children safe in education 2026](#)
- [Working together to safeguard children 2026](#)
- [Preventing and tackling bullying: advice for schools](#)
- [Equality Act 2010 and DfE advice for schools](#)
- [Relationships Education, RSE and Health Education statutory guidance for introduction on 1 September 2026](#)

Scope

This policy applies to all learners and to all staff, volunteers, contractors, and adults working with or visiting the school. Its main procedures address bullying between learners. Concerns involving adults are routed as set out in section 12.

The policy applies to behaviour:

- on school premises and during the school day;
- on school-arranged transport, educational visits, residential activities, work experience, and placements;
- within alternative provision or other education commissioned by the school;
- online, through mobile phones, messaging services, social media, gaming platforms, email, artificial intelligence tools, or other technology; and
- outside school where the behaviour affects a learner's safety, welfare, attendance, education, relationships, or participation in the school community.
- The school will respond to off-site and online incidents within the limits of its role and powers and will work with parents, other settings, the local authority, children's social care and the police where appropriate.

What is bullying?

We recognise that many learners and young people will experience conflict in their relationships with other learners and young people and our schools are committed to

developing empathy and the skills to manage relationships in a peaceful way that does not harm others.

Our definition of 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.”



Relational Conflict and One-Off Incidents

Not every disagreement or conflict is bullying. Relational conflict may involve a disagreement between individuals with a broadly equal balance of power and may be resolved through support, teaching, and restorative work.

A single incident may not meet the usual definition of bullying, but it will still be taken seriously. A one-off incident of violence, discrimination, harassment, sexual harm, threatening behaviour, harmful image sharing or online abuse may constitute a safeguarding concern, breach of the behaviour policy or criminal offence and will be managed through the appropriate procedures.

Staff will avoid labelling children as “a bully” or “a victim.” The policy uses the terms “learner who has experienced or reported bullying” and “learner alleged or found to have displayed bullying behaviour.” The school will use language that is sensitive to the individual learner and does not predetermine the outcome of an investigation.

Forms of Bullying and Related Harmful Behaviour

Bullying can take many forms and different forms may overlap. Examples include:

- **Emotional or relational:** deliberate exclusion, isolation, tormenting, manipulation, threatening behaviour, humiliating someone or damaging friendships and reputation.
- **Verbal:** name-calling, persistent teasing, insults, sarcasm, threats, rumours, or derogatory language.
- **Physical:** pushing, hitting, kicking, biting, hair pulling, damaging belongings, intimidation or any use or threat of violence.
- **Coercion or extortion:** demanding money, belongings, images, actions or favours through pressure, threats, or exploitation.
- **Online or cyberbullying:** harmful messages, exclusion from groups, impersonation, fake accounts, repeated unwanted contact, public humiliation, sharing personal information, images or videos, or using digital tools to target another person.
- **Prejudice-based or discriminatory:** conduct connected with an actual or perceived characteristic, or association with someone who has a characteristic.
- **Sexual, sexist or gender-based:** sexual comments, unwanted sexualised behaviour, sexual harassment, sexism, misogyny, or misandry.
- **SEND or disability-related:** mocking, exploiting, imitating, or targeting a learner's disability, communication, sensory needs, health condition, appearance, equipment, support, learning needs, or behaviour associated with need.

Protected Characteristics and Other Targeted Bullying

The school will explicitly prevent and challenge prejudice-based and discriminatory bullying. This includes bullying related to disability, race, colour, nationality or ethnic origin, religion or belief, sex, sexual orientation, gender reassignment, pregnancy or maternity, and conduct based on perception or association. The school will also challenge bullying related to care status, family circumstances, socioeconomic circumstances, health, appearance, language,

communication, culture, or any other difference.

References to gender reassignment in this policy use the protected characteristic in the Equality Act 2010. The school also prohibits bullying relating to perceived gender identity or gender expression, while ensuring that teaching and responses remain lawful, balanced, and respectful.

Child-on-Child Abuse and Harmful Online Content

Some harmful behaviour may be both bullying and child-on-child abuse. It must be referred to the DSPL and managed under the Safeguarding and Child Protection Policy. This includes, but is not limited to:

- abuse in intimate personal relationships between children;
- serious physical assault, harm, or threats involving a weapon;
- harmful sexual behaviour, sexual violence, or sexual harassment;
- upskirting, initiation or hazing-type behaviour;
- causing someone to engage in sexual activity without consent;
- consensual or non-consensual making or sharing of nudes or semi-nudes; and
- digitally altered or AI-generated sexual or humiliating images, videos, "deepfakes" or "deep nudes."

Staff must not ask a learner to forward, download, print or share a nude or semi-nude image. The DSPL will manage such incidents through the school's safeguarding procedures and current UK Council for Internet Safety (UKCIS) guidance.

SEND, Communication and Increased Vulnerability

Learners with SEND, disabilities or health conditions may be more prone to isolation, prejudice-based bullying, and disproportionate impact, and may show few outward signs. Communication barriers, cognitive understanding, dependency on adults, intimate care needs and difficulty recognising or reporting harm may create additional risk.

Staff must not assume that changes in behaviour, mood, attendance, presentation, or injury are simply part of a learner's disability, diagnosis, or usual presentation. Concerns must be explored with professional curiosity and referred to the DSPL where appropriate.

The school will provide reasonable and individualised adjustments throughout prevention, reporting, investigation, and support. These may include:

- extra time, a familiar adult, advocate, or trusted communication partner;
- symbols, pictures, drawing, writing, signing, communication boards, social stories, AAC or assistive technology;
- questions adapted to the learner's receptive and expressive communication needs;
- a quiet and predictable environment and reduced sensory demand;
- checking understanding and avoiding leading or repeated questioning;
- support from the SENCO and, where relevant, therapists or external professionals; and
- adjusted support and consequences that take account of disability and unmet need while maintaining safety for everyone.

Any report involving a learner with SEND will involve close liaison between the DSPL and SENCO or the person with oversight of SEND. SEND may help explain behaviour, but it does not remove another learner's right to be safe or prevent proportionate action being taken.

Preventing Bullying

Preventing bullying is the responsibility of the whole school community. Each school will use a coordinated strategy appropriate to its learners, age range, needs, and context.

The school will:

- maintain a clear culture in which bullying, discrimination, harassment and abuse are not tolerated;
- teach learners, in age- and development-appropriate ways, the difference between conflict, unkind behaviour, bullying and abuse;
- teach respectful relationships, consent, online safety, personal boundaries, emotional regulation, empathy, and safe help-seeking through PSHE, RSE, assemblies, tutor time, and the wider curriculum;
- actively promote mutual respect and tolerance of those with different faiths and beliefs, alongside democracy, the rule of law and individual liberty;
- use positive-norms language that does not normalise harmful behaviour or stigmatise boys, girls, or any other group;
- ensure that learners know how to report concerns through accessible methods and understand that reports will be taken seriously;
- consult learners and use learner voice, including the voice of learners who communicate non-verbally or are not consistently on site;
- train staff at induction and through regular updates on bullying, child-on-child abuse, SEND vulnerability, prejudice-based bullying, online harm and responding to disclosures;
- identify and supervise locations, times, transport arrangements, and online contexts where risk is higher;
- analyse incidents and adjust staffing, supervision, timetables, environment, curriculum, and interventions;
- operate clear mobile phone and online safety arrangements designed to reduce opportunities for bullying and online harm during the school day;
- work with families and external agencies where additional support or education is needed; and
- provide an accessible learner-friendly version of this policy.

Reporting Bullying

Procedures for Learners:

Learners are encouraged to report anything that makes them feel unsafe, frightened, humiliated, excluded, or worried, whether it happens to them or someone else. A learner does not need to be certain that conduct meets the definition of bullying before reporting it.

A learner may report to:

- any trusted adult in school;
- their class teacher, teaching assistant, or key worker;
- the DSPL or a deputy DSL;
- the Principal, SENDCo or a member of the senior leadership team;
- a parent or carer, who can contact the school; or
- another professional or advocate who can help the learner communicate the concern.

Reports may be made using speech, sign, symbols, AAC, pictures, drawing, writing, email, or another communication method available to the learner. Staff will help a learner to communicate without requiring a particular form of evidence.

Procedures for Parents:

- If a parent has any concerns about their child, they should speak to the class teacher immediately. If a parent thinks bullying is the issue, the matter will be referred to the principal. The principal is always informed of any bullying concerns at the school and monitors the situation carefully.
- If a parent feels unable to talk to the class teacher/tutor, they can make an appointment to speak directly with the DSPL or Principal.
- The school will work with both the learner and the parents to ensure that any bullying is stopped, and that support is given where needed.
- Parents should not confront the bully or their parents. This can complicate the situation and

distress the learner.

- If the bullying is taking place outside of school hours or via social media. Parents may be advised to contact the police if it is deemed necessary. All schools work closely with a police education team to deal with incidents of online and physical bullying that takes place outside of school hours.
- If parents feel that their concern has not been dealt with appropriately, they should follow the school's complaints policy.

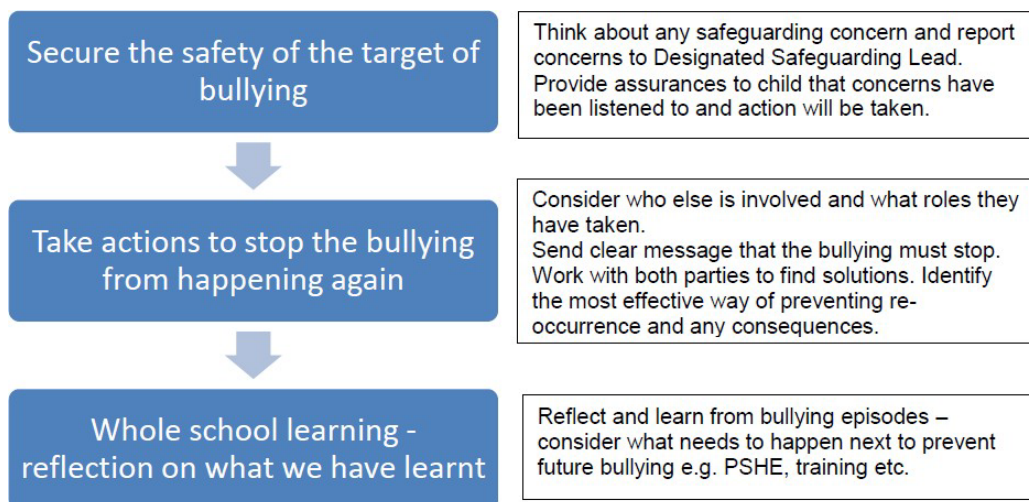
All members of our school communities, including learners, staff, parents, and Directors, are expected to always treat everyone with dignity and respect. This includes both face-to-face contact and online.

How staff must receive a report

- Listen carefully and take the concern seriously.
- Reassure the learner that they have done the right thing by speaking and are not creating a problem.
- Do not promise confidentiality. Explain that information will only be shared with people who need it to help keep children safe.
- Use the learner's communication method and avoid leading questions or asking the learner to repeat the account unnecessarily.
- Record the learner's words or communication accurately and note any immediate action taken.
- Report the concern promptly to the DSPL or deputy where there is any safeguarding element or uncertainty.
- Write up the report on CPOMS that day.

Responding to Bullying

The response will be proportionate to the nature, seriousness, and context of the concern. Safety and safeguarding take priority over establishing whether the behaviour meets the technical definition of bullying.



Recording and investigation

All reported bullying and prejudice-related incidents will be recorded on CPOMS, including concerns that are subsequently assessed as conflict, unkind behaviour, safeguarding, discrimination, or another type of incident. Accurate recording allows the school to identify patterns and take preventive action.

The record should include, where relevant: date, time, and location; learners and adults involved; the reported behaviour and context; the learner's account in their own words or

communication; SEND and communication considerations; witnesses; online evidence; immediate safety action; safeguarding decision; parent contact; investigation outcome and rationale; consequences; support; referrals; and review dates.

The school will investigate fairly and without unreasonable delay. No finding will be predetermined. Information will be shared only with those who need it for safeguarding, investigation, support, supervision, or leadership oversight.

Parents and External Agencies

Parents or carers of the learners involved will normally be informed and kept appropriately updated. The DSPL may delay or limit parent contact where informing a parent could increase risk to a child, conflict with advice from children's social care or police, or prejudice a statutory investigation. The reasons will be recorded.

The DSPL and Principal will consider referral to children's social care, Family Help, the police, health services, the local authority, the commissioned transport provider, alternative provision, or another agency where required. Potentially criminal behaviour will not be managed solely as bullying.

Concerns involving Adults

This policy does not replace the procedures that apply where an adult is involved.

- A concern that a member of staff, supply worker, volunteer, or contractor has bullied, harmed, or behaved inappropriately towards a learner must be reported immediately under the Safeguarding and Child Protection Policy and the allegations or low-level concerns procedures.
- Bullying or harassment between staff is managed through the Staff Code of Conduct, grievance, disciplinary, dignity at work and whistleblowing procedures.
- Bullying, harassment or threatening behaviour by a parent, carer or visitor is managed through the complaints, visitor conduct, safeguarding, health and safety and legal procedures as appropriate.
- Bullying or harassment of staff by a learner will be addressed through the Behaviour and Safeguarding policies, with support and safety planning for the staff member and appropriate support for the learner.

Recording, Monitoring and Director Governance

The Principal and DSPL will monitor bullying and prejudice-related incidents regularly and at least termly. Anonymised information will be reviewed to identify trends, disproportionality, and repeated concerns.

Analysis will consider where relevant:

- type of incident, including cyberbullying and prejudice-based or discriminatory bullying;
- protected characteristic or other targeted difference;
- SEND, communication need and vulnerability;
- location, time, activity, transport route, or online platform;
- repeat involvement, peer-group patterns, and escalation;
- attendance, wellbeing, learning, and participation impact;
- speed and quality of response, parent communication, and follow-up; and
- effectiveness of consequences, support, curriculum, supervision, and risk reduction.

The Principal will provide the Schools Director with an anonymised report at least termly and sooner where a serious incident or concerning pattern arises. The report will identify actions taken and evaluate impact. Small-cohort information will be handled carefully to prevent identification of individual learners.

This policy will be reviewed at least annually and earlier following a significant incident, inspection finding, learner or parent feedback, evidence of ineffective implementation, or a

change to legislation or statutory guidance.

Confidentiality, Complaints and Policy Availability

Confidentiality and information sharing

Information will be shared on a need-to-know basis in line with safeguarding and data protection requirements. Relevant staff may be informed so that they can supervise, support or implement a plan; information will not routinely be shared with all staff.

The school will communicate outcomes appropriately but cannot disclose confidential personal information, safeguarding information or the specific sanction applied to another learner. This does not prevent the school from explaining the actions taken to protect a learner and prevent recurrence.

Complaints

A parent or carer who believes that a concern has not been addressed appropriately may use the school's Complaints Policy. A complaint about the handling of bullying will not stop the school from taking immediate safeguarding or risk-management action. Safeguarding concerns must always be raised directly with the DSPL rather than waiting for the complaints process.

Availability

The school will make particulars of its anti-bullying arrangements available to current and prospective parents in accordance with paragraph 32(3)(d) of the Independent School Standards. The policy will be published on the school website or made available free of charge on request. An accessible or alternative format will be provided where required.

Useful Support Links for Learners

ChildLine

[Bullying and advice on coping and making it stop | Childline](#)

NSPCC

[Bullying Advice For Young People | Help With Bullying](#)

KiDScape

[Bullying Advice For Young People | Help With Bullying](#)

Useful Support Links for Families

NSPCC

[How can I help my child if they are being bullied? | NSPCC](#)

KiDScape

[Bullying Advice For Parents & Carers | Help Stop Bullying](#)

DfE

[Advice for parents and carers on cyberbullying](#)

Links with Other Documentation:

- Safeguarding and Child Protection Policy
- Behaviour Policy
- Online Safety Policy
- Mobile Phone Policy or Statement
- Relationships Education / RSE Policy
- SEND Policy and Accessibility Plan
- Equality, Diversity, and Inclusion Arrangements
- Searching, Screening and Confiscation Policy
- Restrictive Interventions Policy
- Complaints Policy
- Staff Code of Conduct
- Low-Level Concerns and Allegations Procedures
- Whistleblowing Policy
- Data Protection Policy and Privacy Notices
- Exclusions or Expulsion Policy
- Mental Health and Wellbeing Policy

Appendix 1: Learner-Friendly Reporting Guide

You Have The Right To Feel Safe

Bullying, harassment, discrimination, and abuse are not your fault. You can tell us about anything that makes you feel frightened, unsafe, embarrassed, left out or worried.

How can I tell someone?

You can tell any trusted adult. You can use words, signs, symbols, pictures, drawing, writing, AAC, email or another way that works for you. You can ask a parent, carer, advocate, or another professional to help you.

What will the school do?

- Listen and take you seriously.
- Help you feel safe.
- Explain what will happen next.
- Only share information with people who need to help keep children safe.
- Find out what happened fairly.
- Give you support and check that the behaviour has stopped.

Remember

- You do not need to prove that something is bullying before you tell us.
- You will not be in trouble for making an honest report.
- Do not reply to harmful messages or share harmful images. Show them to a trusted adult safely.
- Tell us again if the behaviour continues or you still feel unsafe.

Appendix 2: Staff Response Checklist

✓	Action	Key Reminder
☐	Make the situation safe	Consider separation, first aid, immediate supervision, and online risk.
☐	Listen and reassure	Take the report seriously; do not blame, shame, or promise confidentiality.
☐	Use accessible communication	Use the learner's communication method and reasonable adjustments.
☐	Record accurately	Use the learner's words or communication; note date, time, location, and action.
☐	Refer to the DSPL	Do this promptly where abuse, discrimination, violence, sexual behaviour, harmful imagery, coercion, weapon, or significant risk may be involved.
☐	Preserve evidence safely	Do not forward or print harmful sexual imagery. Follow DSPL advice.
☐	Avoid forced mediation	Speak separately. Do not require confrontation, apology, or restorative work.
☐	Implement the plan	Follow safety, supervision, support, communication, and consequence arrangements.
☐	Follow up	Check that the behaviour has stopped and record the review.