# Anti-bullying Policy

**Withington Girls' School**

**September 2023**

# 1 Policy statement

1.1 **Policy aims:** This is the Anti-Bulling Policy of Withington Girls' School (**School**). Through the operation of this policy we aim:

- to actively promote and safeguard the welfare of pupils at the School;

- to maintain and drive a positive and supportive culture among all pupils and staff throughout the School where all members of the community can thrive and in which learning and teaching can take place in a relaxed and secure atmosphere;

- to prevent bullying, detect it when it occurs, and respond to it appropriately on a case-by-case basis; and

- to help to promote a whole school culture of openness, safety, equality and protection from all forms of harm and abuse.

1.2 This policy forms part of the School's whole school approach to promoting child safeguarding and wellbeing, 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.

1.3 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.

1.4 **Scope:** This policy applies to the whole School. This policy applies at all times when the pupil is:

1.4.1 in or at School (to include any period of remote provision);

1.4.2 representing the School or wearing School uniform;

1.4.3 travelling to or from School;

1.4.4 on School-organised trips;

1.4.5 associated with the School at any time;

1.4.6 in the care of the School or not and the School becomes aware of an incident of bullying.

1.5 This policy shall also apply to pupils at all times and places in circumstances where failing to apply this policy may:

1.5.1 affect the health, safety or well-being of a member of the School community or a member of the public;

1.5.2 have repercussions for the orderly running of the School; or

1.5.3 bring the School into disrepute.

1.6 **Publication:** This policy is provided to all parents, summarised for pupils in the pupil planners, provided to all staff in the Staff Handbook and is also available in hard copy on request in the School office. In addition, the policy is published on the School's website. A copy of the policy is available for inspection from the School office during the School day. This policy can be made available in large print or other accessible format if required.

1.7 **Regulatory Framework:** This policy has been prepared to meet the School's responsibilities under the Equality Act 2010, the Education (Independent School Standards) Regulation 2014,

the Education and Skills Act 2008, the Data Protection Act 2018, the Human Rights Act 1998 and the UK General Data Protection Regulation (UK GDPR).

1.8 **Government guidance:** This policy has regard to the following guidance and advice:

1.8.1 Preventing and tackling bullying: Advice for headteachers, staff and governing bodies (DfE, July 2017);

1.8.2 Cyberbullying: advice for headteachers and school staff (DfE, November 2014);

1.8.3 Working together to safeguard children (HM Government, December 2023);

1.8.4 Keeping children safe in education (DfE, September 2023) (KCSIE);

1.8.5 Behaviour in schools: advice for headteachers and school staff (DfE, September 2022);

1.8.6 Information sharing: advice for safeguarding practitioners providing safeguarding services to children, young people, parents and carers (HM Government, July 2018);

1.8.7 Sexual bullying: developing effective anti-bullying practice (Anti-bullying Alliance);

1.8.8 Sharing nudes and semi-nudes: advice for education settings working with children and young people (DfDCMS and UKCIS, December 2020);

1.8.9 Relationships education, relationships and sex education and health education guidance (DfE, September 2021);

1.8.10 Advice and guidance: how can we stop prejudice based bullying in schools (Equality and Human Rights Commission);

1.8.11 Equality Act 2010: advice for schools (DfE, June 2018);

1.8.12 Searching, screening and confiscation: advice for schools (DfE, September 2022).

1.1 The following School policies, procedures and resource materials are relevant to this policy:

1.1.1 behaviour and discipline policy;

1.1.2 expulsion and remove: review procedure;

1.1.3 risk assessment policy for pupil welfare;

1.1.4 acceptable use policy for pupils;

1.1.5 E- safety policy;

1.1.6 safeguarding and child protection policy and procedures;

1.1.7 policy on special educational needs and learning difficulties;

1.1.8 school rules; and

1.1.9 relationships and sex education policy.

## 2 Bullying

2.1 Bullying is always unacceptable and will not be dismissed as being normal, as "banter", "just having a laugh", "boys being boys" or simply "part of growing up". Bullying will not be tolerated by the School because:

- 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;

- it interferes with a pupil's right to enjoy her learning and leisure time free from intimidation; and

- it is contrary to all our aims and values, our internal culture and the reputation of the School.

2.2    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:

- **Physical**:  hitting, kicking, pushing people around, spitting, shaking, biting, hair pulling or taking, damaging or hiding possessions;

- **Verbal**:  name-calling, gossiping, taunting, teasing, insulting, threatening or undermining, humiliating  or demanding money;

- **Non-verbal abuse:** hand signs or text messages (see also cyberbullying below);

- **Emotional abuse:** controlling or manipulating someone, making silent, hoax or abusive calls;

- **Exclusionary behaviour**:  intimidating, isolating or excluding a person from a group;

- **General unkindness**:  spreading rumours or writing unkind notes, mobile phone texts or e-mails / electronic communications;

- **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;

- **Low- level disruptive behaviour**: swearing, 'banter' and 'horseplay' over a prolonged period of time;

- **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 Acceptable Use Policy for Pupils sets out the School rules about the use of technology including mobile electronic devices;

- **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;

- **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.

2.3 **Discrimination-based bullying:** 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; or

- 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 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.

2.4 Racial, sexual, biphobic, transphobic or homophobic bullying and bullying someone because they have a disability are also hate crimes.

2.5 **A girl who is being bullied may:**

- Change her usual routine

- Be unwilling to go to school (school phobic)

- Become anxious and withdrawn

- Attempt or threaten suicide

- Cry herself to sleep at night or have nightmares

- Feel ill or feign illness in the mornings

- Truant

- Show an unexpected decline in standards of work

- Come home or arrive in school with damaged equipment, e.g. clothes, books

- Have possessions 'go missing'

- Ask to borrow money or steal money

- Continually 'lose' pocket money

- Have unexplained cuts, scratches or bruises

- Become withdrawn, lack confidence

- Become distressed or depressed

Staff and pupils should be aware of the above but the presence of one or more of these signs and symptoms is not in itself proof of bullying.

2.6 **Intention:** 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.

2.7 **Legal aspects:** 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 e-mail / electronic communication) to another person with the intent to cause distress or anxiety.

2.8 **Safeguarding and child on child abuse**:

2.8.1 Bullying is closely connected with pupil wellbeing 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.

2.8.2   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", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours and create an unsafe environment for pupils. In worst case scenarios, dismissing sexual harassment can led to a culture that normalises abuse and pupils accepting it as normal and not coming forward to report it.

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

2.8.4   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 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 Policy and Procedures and appropriate action taken, taking into account the Manchester Safeguarding Partners' threshold document.

## 3      Anti-bullying culture and systems

3.1     **Responsibility:**  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 she is new in the School, appears to be uncertain or has no friends.  She may also become a target because of an irrational decision by a bully.

3.2     **Ethos:**  Our expectation of all members of the School community is that:

- everyone will uphold the School's Golden Rule of Respect for Self and Respect for Others which is reflected in the School's Anti-Bullying Statement and underpins the School's Behaviour and Discipline Policy in order to ensure an open, positive, friendly and caring atmosphere which promotes positive self-images and encourages appropriate behaviour in all areas;

- 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;

- a complaint of bullying will always be taken seriously;

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

3.3     **Equal opportunities:**  In School and in every year group:

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

- 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;

- positive attitudes are fostered towards gender and sexuality differences through the curriculum and form time; and

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

3.4 **Board of Governors:** The Board of Governors, as the proprietor of the School, has overall responsibility for this policy and 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:

- minimise the risk of bullying at the School so that pupils and staff feel safe and secure;

- intervene early in low-level disruption to prevent negative behaviours escalating;

- 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; and

- 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.

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

- celebrating achievement;

- anticipating problems and providing support;

- 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;

- 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;

- 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;

- making opportunities to listen to pupils;

- acting as advocates of pupils;

- 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;

- reporting concerning behaviour in accordance with the provisions outlined in this policy, adopting a 'it could happen here' approach.

3.5.1 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 dining hall and in the dining hall itself;

(d)       in School corridors;

(e)       on School transport / School trips.

3.5.2    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.

3.6    **Parents:** 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.

3.7    **Pupils:** Through our pastoral care systems, pupils are informed and taught that bullying will not be tolerated in the School. They are encouraged:

- to celebrate the effort and achievements of others;

- to hold and promote positive attitudes;

- to feel able to share problems with staff;

- to turn to someone they trust, if they have a problem;

- not to feel guilty about airing complaints;

- to be kind, considerate and tolerant towards others;

- to treat lunch as a pleasant social occasion;

- to make good use of their free time;

- to challenge their peers if they are unkind to others;

- to be aware of the impact their behaviour can have on others;

- to celebrate the diversity of others; and

- to use technology safely and securely and to be aware of the risks and impact of the use of technology on themselves and others.

# 4    Anti-bullying systems

4.1    **Approach:** Our systems for detecting and dealing with bullying are designed to operate:

- horizontally, within year groups and in the classroom and other activities;

- vertically, through all year groups.

Our anti-bullying systems are implemented and driven in the way described below.

4.2    **Vigilance:** Members of staff and volunteers are vigilant at all times but particularly:

- at the start and end of the school days when pupils arrive and leave the site;

- before lessons, at morning break and at lunchtime;

- in the queue for the dining room and in the dining room itself;

- when on their weekly duty;

- in School corridors;

- on School transport / School trips.

4.3 **Meetings:** Bullying is discussed in the following meetings:

- members of the Senior Leadership Team

- Heads of Year

- Heads of Year and Form Tutors

- Heads of Year/Form Tutors with pupils in their year/form group/Peer Support team

- Deputy Head and Assistant Head of Sixth Form with Peer Supporters

- Weekly staff meetings

- Junior School staff meetings

- School Council

The result of these meetings is to feed back information about pupil welfare and behaviour, friendship patterns, particular incidents, any pupil who seems to be isolated, any growing 'power base' and any known conflict between a member of staff and a pupil, or between pupils so that strategies can be developed to prevent bullying incidents.

4.4 **Education:** Measures are taken throughout each year to educate pupils about bullying and this policy. These measures include:

    4.4.1 **PSHCE (including Relationships and Sex Education):** sessions across Years 3-11 which cover:

- What bullying is; what to do if bullying occurs; Anti-Bullying statement;

- The School community; friendships; personal identity; work around self-esteem;

- Cyberbullying; sessions led by Childnet;

- Healthy relationships; resolving conflict;

- Abuse in relationships.

    4.4.2 The School community will challenge stereotypical opinions so negative views are not perpetuated e.g. misogyny.

    4.4.3 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, guidance in student planners and occasional events held at the School to raise awareness. See the School's e-Safety Policy for further information about the School's online safety strategy.

    4.4.4 The display of the School's Anti-bullying Statement (written and designed by School Council) around the School.

    4.4.5 Anti-bullying messages in assemblies and other assemblies which encourage mutual respect and understanding and celebrate success.

4.4.6 The 'Personal Responsibility, Behaviour and Discipline', 'Pupil Guidelines - Who Can Help You?' and 'Online Safety' sections in the Pupil Handbook.

4.4.7 The training of our Peer Supporters in how to be alert to and respond to bullying.

4.4.8 Organising activities to mark national Anti-bullying week.

4.4.9 Taking other opportunities to address the topic of bullying across the curriculum for example, in Drama, English Literature, History, Religious Studies.

4.4.10 Setting up a system of Bus Buddies.

4.4.11 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.

4.5 **Staff guidance and training:** The School ensures that regular guidance and training in all aspects of care 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:

- having an understanding of the groups who may be more vulnerable to bullying;

- awareness of the risks and indications of bullying, and how to deal with cases;

- there is adequate staff presence and supervision;

- staff are actively involved with pupils when they are on duty;

- measures are taken to avoid boredom and lack of purpose among pupils;

- there is space available for pupils' quiet withdrawal;

- good behaviour and discipline is maintained;

- counselling skills (including bereavement);

- awareness of the risks of child-on-child abuse including sexual violence and sexual harassment and how bullying may give rise to safeguarding concerns.

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

The School maintains written records of all staff training.

4.6 **Pupils' responsibilities:** We emphasise with senior pupils the role which is expected of them in setting a good example and being helpful to younger pupils and each other. This is particularly encouraged through the House System, Peer Support System and involvement of older pupils in helping to run Religious Societies and some extra-curricular activities.

# 5 Why incidents might not be reported

5.1.1 **Victim:** There are many reasons why a pupil who has suffered bullying may be reluctant to report it. She may become demoralised and may think, for example:

- it is telling tales;

- 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;

- the things they are saying and doing are too embarrassing to discuss with an adult;

- it is all my fault anyway for being overweight / too studious etc;

- there are too many of them; there is nothing the staff can do;

- it will get back to my parents and they will think less of me;

- I will just try and toughen up and grow a thicker skin;

- I will lie low and not draw attention to myself (e.g. by auditioning for a part in the school play etc.);

- the perpetrator's behaviour may become worse if I report it; or

- this is a normal part of growing up and going to school.

5.1.2 **Witnesses:** There are also reasons why a pupil who has witnessed or learned of bullying behaviour may not want to make a report. She may say:

- it is "grassing" and I will become unpopular;

- she is worried the perpetrator may turn on her;

- it is not my concern anyway; or

- I don't like the victim and I would find it embarrassing to be associated with her.

5.2 **Culture:** Any of these responses would be contrary to our culture at the School. When we drive and implement this policy we encourage every pupil (and their parents) to understand that:

- every complaint of bullying will be taken seriously;

- members of staff and volunteers will deal with a complaint correctly and effectively in accordance with their experience and the training they have received;

- there is a solution to nearly every problem of bullying;

- a pupil who complains will receive support and advice and in many cases the problem can be dealt with on a no-names basis;

- the primary aim will be for the bullying to cease, not the punishment of the bully unless this is necessary; and

- we may need to support the bully as well so we can address the causes of bullying behaviour.

## 6 Reporting concerns

6.1 **Pupils:** A pupil who is being bullied, or who is worried about another pupil being bullied, should tell someone without delay and can do so in several ways. She can:

- tell her parents, her Form Tutor, Head of Year, the School Nurse, Peer Supporter, Deputy Head, Head of Juniors, Headmistress or any other member of staff or responsible older pupil;

- place a note in the Worry Box (outside the School Nurse's room) or Chatterbox (outside the Junior Office). Pupils can choose whether their notes are anonymous or not;

- access advice and / or contact a member of the pastoral team through WGS Online Help and Support;

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

6.2 **Parents:** Parents who are concerned that their child is being bullied should inform their child's Form tutor or Head of Year without delay.

6.3 **Staff:** 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 Grievance, Bullying and Harassment Policy and Procedure. Pupils and parents who feel that a member of staff is bullying should report this in accordance with the procedures set out above.

6.4 **Initial complaint:** Any 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) not ask leading questions;

(d) reassure the child but not give a guarantee of confidentiality;

(e) report the allegation to the Head of Year of the victim and the alleged bully as soon as possible.

6.4.2 The Head of Year must inform the Deputy Head and contact the relevant Form Tutor and other Head of Year (if applicable) to agree on a strategy, for dealing with the matter.

6.4.3 If the alleged bullying 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 potentially involving harmful sexual behaviours, staff will follow guidance set out in Part 5 of KCSIE.

# 7 Assessment of concerns

7.1 **Assessment:** The pupil's 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:

- the nature of the incident(s) - physical? sexual? verbal? exclusionary? etc

- is it a "one-off" incident involving an individual or a group?

- is it part of a pattern of behaviour by an individual or a group?

- has physical injury been caused?

- who should be informed? The Headmistress? Parents? The School's Designated Safeguarding Lead? Children's Social Care? The police?

- can the alleged bully be questioned without disclosing the victim's identity?

- what is the likely outcome if the allegation proves to be correct?

At this stage, the possible outcomes for an incident which is not too serious include:

- there has been a misunderstanding which can be explained sympathetically to the alleged victim with advice to the alleged bully; or

- the complaint is justified in whole or in part, and further action will be needed (see Range of Action, below).

7.2 **Serious incident:** 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 always be the case 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.

7.3 Otherwise, in cases where the pupil's Head of Year believes that serious bullying behaviour:

- has occurred involving a pupil in his / her year; or

- has recurred after warnings have been given to the "bully"

he / she must inform the Headmistress and the School's Designated Safeguarding Lead (currently Jen Baylis, Deputy Head (Senior School), Louise Cordrey, Deputy Head of Junior School (Junior School)). The Designated Safeguarding Lead will then:

- interview the alleged victim, bully and any witnesses separately, in order to establish the facts of the case. She may decide to ask the Head of Year to be present; and

- send a summary of her findings to the Headmistress and other relevant Heads of Year or staff.

7.4 Together with the Headmistress, the Deputy Head will decide on the action to be taken in accordance with the Range of Actions set out below. The Headmistress 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 and Discipline Policy and Expulsion, Removal and Review Policy.

## 8 Response to concerns

8.1 **Range of Actions:** When a complaint of bullying behaviour is upheld the range of responses may include one or more of the following:

- 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;

- 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;

- advice and support to the bully in trying to change her behaviour. This may include clear instructions and a warning or final warning;

- 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 any safeguarding concerns relating to the bullying behaviour, the School's child protection procedures will be followed;

- 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);

- 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, after a fair hearing, be required to leave the School permanently in accordance with the School's Expulsion, Removal and Review 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;

- action to break up a 'power base';

- 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 Acceptable Use Policy for Pupils);

- moving either the bully or victim to another form after consultation with the pupil, her parents and the relevant staff;

- involving children's social care or the police;

- notifying the parents of one or both pupils about the case and the action which has been taken;

- notifying external agencies where appropriate;

- such other action as may appear to the Headmistress to be appropriate; and/or

- liaison between Heads of Year, the outcome being recorded in the Incident File.

## 9 Supporting those severely impacted by bullying

9.1 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.

9.2 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.

9.3 In the rare situation, where reintegration is not possible, the School will make other arrangements for the pupil to continue their education in another school.

9.4 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 SEN.

9.5 **Monitoring:** The position should be monitored for as long as necessary thereafter. Action may include:

- sharing information with some or all colleagues and with some pupils so that they may be alert to the need to monitor certain pupils closely;

- ongoing counselling and support;

- vigilance;

- mentioning the incident at appropriate staff meetings;

- reviewing vulnerable individuals and areas of the School.

## 10    Risk assessment

10.1    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.

10.2    The format of any such risk assessment may be a stand-alone document or recorded on the School's electronic safeguarding management system.  It may vary and 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.

10.3    The Headmistress 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.

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

## 11    Record keeping, Monitoring and Review

11.1    School staff maintain records of the welfare and development of individual pupils. Every complaint or report of bullying must be reported by the Heads of Year to the Deputy Head and recorded centrally in the Incident File.  Heads of Year and the Deputy Head keep the Incident File up-to-date.  The Deputy Head monitors the Incident File at the end of each half term in order 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.  In the Junior School there is an Incident Concerns Sheet in each class file which is kept up to date by the Head of Juniors.

11.2    This Policy will be reviewed by the Deputy Head and revisions made on an annual basis, or more regularly as required and taking into account any advice published by the DfE together with the centralised records of any bullying incidents.  In undertaking the review the Deputy Head will take into account the results of the monitoring as set out above, as well as any changes in legislation and / or statutory guidance and other relevant information gathered (such as through a bullying survey).

11.3    The Board of Governors will consider the revisions made as part of its collective responsibility to carry out an annual review of safeguarding.

11.4    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.

11.5    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 about pupils and parents.  The privacy notices are published on the School's website.  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;  This includes the School's data protection policy and information security policy.

## 12    Version control

| | |
|---|---|
| Date of adoption of this policy | September 2023 |
| Date of last review of this policy | Summer 2023 |
| Date for next review of this policy | Summer 2024 |
| Policy owner (SLT) | Jen Baylis |
| Policy owner (Board of Governors) | Jane Allred |

## Appendix 1  Cyberbullying - guidance for pupils

The Department for Education's guidance Preventing and tackling bullying (publishing.service.gov.uk) (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 time of the day, with a potentially bigger audience, and more accessories as people forward on content at a click'.

1        Cyberbullying is bullying that takes place using technology.

2        It can take the form of many behaviours including:

        2.1        Harmful messages (text, instant, multimedia, email)

        2.2        impersonating another person online

        2.3        sharing private messages

        2.4        uploading photographs or videos of another person that leads to shame and embarrassment

        2.5        creating hate websites/social media pages

        2.6        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 block someone who is behaving badly; and

        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:

        http://www.childnet.com/young-people

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

        https://www.childline.org.uk/Explore/Bullying/Pages/online-bullying.aspx

        https://www.saferinternet.org.uk/advice-centre/young-people

http://www.safetynetkids.org.uk/

https://www.ceop.police.uk/Safety-Centre/How-can-CEOP-help-me-YP/

https://www.bbc.com/ownit

5    Please see the School's 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.

6    For further information and guidance about cyberbullying and e-safety, please see the Department of Education's Advice for parents and carers on cyberbullying (publishing.service.gov.uk) (November 2014).