



Anti-bullying Policy

St Peter's School, York

March 2024

(Next review: Easter term 2025)

1 Policy statement

- 1.1 St Peter's School, York comprises of St Peter's 2-8 (for pupils aged 2 to 8 years), St Peter's 8-13 (for pupils aged 8 to 13 years) and St Peter's 13-18 (for pupils aged 13 to 18 years), collectively referred to in this policy as the School unless otherwise stated. This policy applies to the whole school including the Early Years Foundation Stage (EYFS). This policy is provided to all parents, pupils and staff, is available on the School's website and is also available on request from the School Office. The School is committed to opposing bullying in all its forms, and takes the harm done by this behaviour extremely seriously. The School will respond to all instances of bullying that are disclosed or reported.
- 1.2 This policy has been prepared to meet the School's responsibilities under the Education (Independent School Standards) Regulations 2014, the National Minimum Standards for Boarding Schools ((DfE, September 2022) and the Statutory Framework for the EYFS Statutory framework for group and school based providers (DfE, November 2024), the Education and Skills Act 2008, the Data Protection Act 2018 and General Data Protection Regulation (GDPR), the Human Rights Act 1998 and the Equality Act 2010. It has regard to the following guidance and advice:
 - 1.2.1 *Preventing and tackling bullying* (DfE, July 2017)
 - 1.2.2 *Cyberbullying: advice for headteachers and school staff* (DfE, November 2014);
 - 1.2.3 *Working together to safeguard children* (DfE, February 2024);
 - 1.2.4 *Keeping children safe in education* (DfE, September 2024);
 - 1.2.5 *Sexual and sexist bullying: developing effective anti-bullying practice* (Anti-bullying Alliance);
 - 1.2.6 *Sharing nudes and semi-nudes: advice for education settings working with children and young people* (DIST and UKCIS, March 2024);
 - 1.2.7 *Behaviour in schools: advice for headteachers and school staff* (DfE, September 2022, updated October 2022);
 - 1.2.8 *Searching, screening and confiscation: advice for schools* (DfE, July 2022, in force September 2022); and
 - 1.2.9 *Technical guidance for schools in England* (Equality and Human Rights Commission, July 2024);
 - 1.2.10 *Equality Act 2010: advice for schools* (DfE, June 2018); and
 - 1.2.11 *Relationships education, relationships and sex education and health education guidance* (DfE, September 2021).
 - 1.2.12 *Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers* (DfE, May 2024); and
 - 1.2.13 *Mobile phones in schools: guidance* (DfE, February 2024).

- 1.3 The following School policies, procedures and resource materials are relevant to this policy:
 - 1.3.1 behaviour and discipline policy;
 - 1.3.2 expulsion, removal and review policy;
 - 1.3.3 Risk assessment policy for pupil welfare;
 - 1.3.4 acceptable use of ICT policy for pupils;
 - 1.3.5 online safety policy;
 - 1.3.6 child protection and safeguarding policy and procedures;
 - 1.3.7 policy on smoking, alcohol, drugs and substances;
 - 1.3.8 pupil concerns and complaints policy;
 - 1.3.9 SEN policy;
 - 1.3.10 school rules;
 - 1.3.11 relationships and sex education policy; and
 - 1.3.12 PSHEE policy.
- 1.4 Through the operation of this policy we aim:
 - 1.4.1 to actively promote and safeguard the welfare of pupils and staff at the School;
 - 1.4.2 to maintain and drive a positive and supportive culture among all pupils and staff throughout the School;
 - 1.4.3 to prevent bullying behaviour, detect it when it occurs, and respond to it appropriately on a case-by-case basis;
 - 1.4.4 to encourage and support pupils to disclose and report instances of bullying; and
 - 1.4.5 to help promote a whole school culture of openness, safety, equality and protection from all forms of harm and abuse.
 - 1.4.6 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.
 - 1.4.7 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.
- 1.5 This policy applies at all times when the pupil is:
 - 1.5.1 in or at School;

- 1.5.2 whether in or outside of school (to include any period of remote provision);
 - 1.5.3 representing the School or wearing School uniform;
 - 1.5.4 travelling to or from School;
 - 1.5.5 on School-organised trips;
 - 1.5.6 associated with the School at any time;
 - 1.5.7 in the care of the School or not and the School becomes aware of an incident of bullying.
- 1.6 This policy shall also apply to pupils at all times and places in circumstances where failing to apply this policy may:
- 1.6.1 affect the health, safety or well-being of a member of the School community or a member of the public;
 - 1.6.2 have repercussions for the orderly running of the School; or
 - 1.6.3 bring the School into disrepute.

2 Bullying

- 2.1 Bullying behaviour is always unacceptable and will not be dismissed as being normal or as "banter", "just having a laugh", "boys being boys" or simply "part of growing up". Bullying will not be tolerated at the School because:
- 2.1.1 it is harmful to the person who is bullied, and 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
 - 2.1.2 it interferes with a pupil's right to enjoy their learning and leisure time free from intimidation
 - 2.1.3 it is contrary to all our aims and values, our internal culture and the reputation of the School.
- 2.2 This policy will apply to bullying behaviour outside of the School of which the School becomes aware.
- 2.3 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:
- 2.3.1 **Physical:** hitting, kicking, pushing people around, spitting; shaking, biting, hair pulling or taking, damaging or hiding possessions;
 - 2.3.2 **Verbal:** name-calling, gossiping, taunting, teasing, insulting, threatening or undermining, humiliating or demanding money;
 - 2.3.3 **Non-verbal abuse:** hand signs or text messages (see also cyberbullying below);
 - 2.3.4 **Emotional abuse:** controlling or manipulating someone, making silent, hoax or abusive calls;

- 2.3.5 **Exclusionary Behaviour:** intimidating, isolating or excluding a person from a group;
- 2.3.6 **General Unkindness:** constant criticism, spreading rumours or writing unkind notes, mobile phone texts or e-mails;
- 2.3.7 **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;
- 2.3.8 **Low level disruptive behaviour:** wearing "banter" and "horseplay" over a prolonged period of time;
- 2.3.9 **Cyberbullying:** 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 of ICT 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;
- 2.3.10 **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, including digitally manipulated or AI-generated 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.

2.4 **Discrimination-based bullying:** bullying may also be:

- 2.4.1 **sexist:** related to a person's sex or gender reassignment;

- 2.4.2 racist, or regarding someone's religion, belief or culture;
 - 2.4.3 related to a person's sexual orientation (homophobic bullying);
 - 2.4.4 related to pregnancy and maternity;
 - 2.4.5 related to a person's home circumstances;
 - 2.4.6 related to a person's disability, special educational needs, learning difficulty, health or appearance;
 - 2.4.7 related to a person's age; or
 - 2.4.8 **LGBT-based bullying:** Children who are lesbian, gay, bisexual, or transgender (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.
- 2.5 Racial, sexual, biphobic, transphobic or homophobic bullying and bullying someone because they have a disability are also hate crimes.
- 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) to another person with the intent to cause distress or anxiety.
- 2.8 **Safeguarding and child on child abuse:** 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.

- 2.9 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 lead to a culture that normalises abuse and pupils accepting it as normal and not coming forward to report it.
- 2.10 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 messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography.
- 2.11 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 Child Protection and Safeguarding 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 Child Protection and Safeguarding Policy and procedures and appropriate action taken, taking into account the Local Safeguarding Partners' threshold document.

2.12

3 Anti-bullying culture and systems

- 3.1 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 disability, home circumstances or because they are new in the School, appear to be uncertain or have no friends. They may also become a target because of an irrational decision by a bully.
- 3.2 Our expectation of all members of the School community is that:
- 3.2.1 everyone will uphold the School values and rules, especially with regards to respecting one another;
 - 3.2.2 a pupil or a member of staff or volunteer who witnesses or hears of an incident of bullying will report it in accordance with this policy;
 - 3.2.3 a complaint of bullying will always be taken seriously; and
 - 3.2.4 no one will tolerate unkind actions or remarks or stand by when someone else is being bullied.
- 3.3 Throughout the School and in every year group:
- 3.3.1 discriminatory and offensive words and behaviour are treated as unacceptable
 - 3.3.2 pupils learn about the impact of bullying on mental health and wellbeing through the curriculum

- 3.3.3 positive attitudes are fostered towards people with any protected characteristics including those who are disabled and towards ethnic, religious, cultural and linguistic groups within and outside the School
- 3.3.4 positive attitudes are fostered towards gender and sexuality differences through the curriculum
- 3.3.5 incidents of bullying which are based on protected characteristics will be distinguished in the School's records.
- 3.4 **Governing Body:** The Governing Body, as 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:
 - 3.4.1 minimise the risk of bullying at the School so that pupils feel safe and secure;
 - 3.4.2 intervene early in low-level disruption to prevent negative behaviours escalating;
 - 3.4.3 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;
 - 3.4.4 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 and model an anti-bullying culture by:
 - 3.5.1 celebrating achievement;
 - 3.5.2 anticipating problems, providing support, communicating appropriately with one another, effectively sharing information, and tracking pupil's development and wellbeing;
 - 3.5.3 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;
 - 3.5.4 disciplining perpetrators fairly, consistently and reasonably, taking into account any special educational needs or disabilities of the pupil and the needs of vulnerable pupils, taking into account the motivations and any underlying safety concerns of the perpetrator and providing support as appropriate;
 - 3.5.5 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;
 - 3.5.6 making opportunities to listen to pupils;
 - 3.5.7 acting as advocates of pupils;

- 3.5.8 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;
- 3.5.9 engagement with pupils through discussion and through questionnaires and surveys;
- 3.5.10 modelling exemplary behaviour towards pupils and other staff members;
- 3.5.11 reporting concerning behaviour in accordance with the provisions outlined in this policy, adopting a "it could happen here" approach.
- 3.6 **Pupils:** Through the School's pastoral care systems, pupils are informed and taught that bullying will not be tolerated in the School. They are encouraged:
 - 3.6.1 to celebrate the effort and achievements of others;
 - 3.6.2 to hold and promote positive attitudes;
 - 3.6.3 to feel able to share problems with staff, and taught how to report and who they can report to;
 - 3.6.4 to turn to someone they trust, if they have a problem;
 - 3.6.5 not to feel guilty about airing complaints;
 - 3.6.6 to be kind, considerate and tolerant towards others;
 - 3.6.7 to be aware of the impact their behaviour can have on others;
 - 3.6.8 to challenge their peers if they are unkind to others;
 - 3.6.9 to celebrate the diversity of others;
 - 3.6.10 to use technology safely and securely and to be aware of the risks and impact of the use of technology on themselves and others.
- 3.7 **Parents:** The School will take active measures to promote an anti-bullying culture and will convey the message that bullying will not be tolerated in the School to parents. This includes reference in presentations to new parents as part of the induction process, the Parent Handbooks at St Peter's 8-13 and St Peter's 2-8, and the termly School calendars.

4 Anti-bullying systems

- 4.1 The School's systems for detecting and dealing with bullying are designed to operate vertically (through all year groups) and horizontally (within year groups and in the classroom and other activities).
- 4.2 Members of staff are vigilant at all times but particularly:
 - 4.2.1 at the start and end of the school day when pupils arrive and leave the site;
 - 4.2.2 before lessons;
 - 4.2.3 in the queue for the dining hall and in the dining hall itself;
 - 4.2.4 in School corridors;

- 4.2.5 on school transport;
- 4.2.6 in house areas;
- 4.2.7 in playgrounds and communal areas.
- 4.3 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 interventions and 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 The PSHEE curriculum includes lessons on bullying;
 - 4.4.2 the School community will challenge stereotypical opinions so negative views are not perpetuated e.g. misogyny;
 - 4.4.3 Anti-bullying posters placed around the School;
 - 4.4.4 Anti-bullying messages are given in assemblies;
 - 4.4.5 Once a year we hold an Anti-bullying week;
 - 4.4.6 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 events held by the School to raise awareness. See the School's Online Safety Policy for further information about the School's online safety strategy.
- 4.5 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 without outwardly showing any signs of this. While the school takes all cases of bullying seriously, it recognises the heightened vulnerability of pupils in these categories and will consider extra pastoral support for them, as required. The Keep in View process includes a weekly review of all pupils deemed to be vulnerable. Concerns are noted and actions put in place for pastoral support in cases where protected characteristics may raise vulnerability.
- 4.6 **Staff training:** The School ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff and volunteers understand what is expected of them by this policy and have the necessary knowledge and skills to carry out their roles especially:
 - 4.6.1 having an understanding of the groups who may be more vulnerable to bullying;
 - 4.6.2 awareness of the risk and indications of bullying, and how to deal with cases;
 - 4.6.3 counselling skills (including bereavement);
 - 4.6.4 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. Written records are kept of all staff training.

- 4.7 **Pupils' responsibilities:** All pupils are expected to set a good example and be helpful to each other, whatever their age. Monitors receive training on recognising bullying behaviour and ensuring that they use their position effectively.

5 **Why incidents might not be reported**

- 5.1 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:

- 5.1.1 it is telling tales;
- 5.1.2 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;
- 5.1.3 the things they are saying and doing are too embarrassing to discuss with an adult;
- 5.1.4 it is all my fault anyway for being overweight / too studious etc;
- 5.1.5 there are too many of them; there is nothing the staff can do;
- 5.1.6 it will get back to my parents and they will think less of me;
- 5.1.7 I will just try and toughen up and grow a thicker skin;
- 5.1.8 I will lie low and not draw attention to myself;
- 5.1.9 this is a normal part of growing up and going to school.

- 5.2 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:

- 5.2.1 it is "grassing/snitching" and I will become unpopular;
- 5.2.2 it is not my concern anyway;
- 5.2.3 I don't like the victim and I would find it embarrassing to be associated with them.

- 5.3 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:

- 5.3.1 every complaint of bullying will be taken seriously;
- 5.3.2 members of staff and volunteers will deal with a complaint correctly and effectively in accordance with their experience and the training they have received;
- 5.3.3 there is a solution to nearly every problem of bullying;
- 5.3.4 a pupil who complains will receive support and advice and in many cases the problem can be dealt with on a no-names basis;

- 5.3.5 the primary aim will be for the bullying to cease, not the punishment of the bully unless this is necessary;
- 5.3.6 we may need to support the bully as well so we can address the causes of bullying behaviour.

6 Procedures

6.1 Reporting bullying complaints

- 6.1.1 **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. They can:
 - (a) tell their parents, Housemaster / Housemistress, Form Tutor or any member of staff or volunteer at the School or responsible older pupil;
 - (b) contact the School Mental Health Team or the Independent Listener whose details are published in the Safeguarding Policy and around School for advice;
 - (c) contact the NSPCC Helpline (0808 8005000) or Childline (0800 1111) or the Children's Commissioner (0800 528 0731).
- 6.1.2 **Parents:** Parents who are concerned that their child, or another child, is being bullied should inform their child's Form Tutor/Mentor or House Master/Mistress without delay.
- 6.1.3 **Staff:** This policy focuses mainly on the bullying of pupils by pupils 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 Employees Equal Opportunities and Harassment at Work Policy. Pupils and parents who feel that a member of staff is bullying should report this in accordance with the procedures set out above.

6.2 **Initial complaint:** A member of staff who learns of alleged bullying behaviour should:

- (i) respond quickly and sensitively by offering advice, support and reassurance to the alleged victim;
- (ii) listen carefully and keep an open mind;
- (iii) not ask leading questions; ;
- (iv) reassure the child but not give a guarantee of confidentiality; and
- (v) report the allegation to the pupil's class teacher/mentor/House Master/House Mistress as soon as possible.

6.3 If the alleged bullying behaviour raises a safeguarding concern, the matter must be reported in accordance with the School's Child Protection and Safeguarding Policy

and Procedures before further investigation is carried out. The Designated Safeguarding Lead must be informed. In the case of bullying potentially involving harmful sexual behaviours, staff will follow guidance set out in Part 5 of KCSIE.

- 6.4 The class teacher/mentor/tutor must inform the Deputy Head and contact the relevant House master or mistress (St Peter's 13-18)/House tutor (St Peter's 8-13) to agree on a strategy for dealing with the matter.
- 6.5 **Assessment of Concerns:** The class teacher (St Peter's 2-8)/House Master/Mistress (St Peter's 13-18)/mentor (St Peter's 8-13) 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:
 - 6.5.1 the nature of the incident(s) - physical? verbal? sexual? exclusionary? etc
 - 6.5.2 is it a "one-off" incident involving an individual or a group?
 - 6.5.3 is it part of a pattern of behaviour by an individual or a group?
 - 6.5.4 has physical injury been caused?
 - 6.5.5 Who should be informed? Head? Parents? The School's Designated Safeguarding Lead? Children's Social Care? The police?
 - 6.5.6 can the alleged bully be questioned without disclosing the victim's identity?
 - 6.5.7 what is the likely outcome if the allegation proves to be correct?
- 6.6 At this stage, the possible outcomes for an incident which is not too serious include:
 - 6.6.1 there has been a misunderstanding which can be explained sympathetically to the alleged victim with advice to the alleged bully; or
 - 6.6.2 the complaint is justified in whole or in part, and further action will be needed (see Range of Action, below).
- 6.7 If at any stage the alleged bullying behaviour raises a safeguarding concern, the School's Child Protection and Safeguarding 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 (including digitally manipulated or AI-generated nude or semi-nude imagery) 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 Child Protection and Safeguarding Policy and procedures.
- 6.8 Otherwise, in cases in cases where the class teacher (St Peter's 2-8)/House Master/Mistress (St Peter's 13-18)/mentor (St Peter's 8-13) believes that serious bullying behaviour has occurred involving a pupil or has recurred after warnings have been given to the "bully" they will refer the matter to the Deputy Head. The Deputy Head will then:
 - 6.8.1 interview the alleged victim, bully and any witnesses separately, in order to establish the facts of the case. They may decide to ask another senior member of staff to be present; and

- 6.8.2 send a summary of their findings to the Head and other relevant staff.
- 6.9 Together with the Head, the Deputy Head will decide on the action to be taken in accordance with the Range of Actions set out below. The Deputy Head will notify the parents of the victim and bully giving them details of the case and the action being taken. In serious cases, such action may include further investigation and action in accordance with the School's Behaviour and Discipline Policy and the Expulsion, Removal and Review Policy.
- 6.10 **Response to Concerns:** When a complaint of bullying behaviour is upheld, the range of responses will include one or more of the following:
- 6.10.1 consideration as to whether the bullying incident should be addressed as a safeguarding concern and if so, the School's Child Protection and Safeguarding Policy and Procedures will be followed
 - 6.10.2 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
 - 6.10.3 advice and support to the bully in trying to change their behaviour. This may include clear instructions and a warning or final warning
 - 6.10.4 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 lead to any concerns that the bully may be at risk of harm, the School's child protection procedures will be followed
 - 6.10.5 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)
 - 6.10.6 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 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
 - 6.10.7 action to break up a "power base"
 - 6.10.8 confiscation of mobile electronic devices, increased monitoring procedures or limiting access to the School's internet and email facilities if cyberbullying (see the School's Policy on the Safe and Acceptable Use of ICT)
 - 6.10.9 involving Children's Social Care or the police
 - 6.10.10 moving either the bully or victim to another House or form group after consultation with the pupil, their parents and the relevant staff
 - 6.10.11 notifying the parents of one or both pupils about the case and the action which has been taken, as appropriate

- 6.10.12 notifying the parents of one or both pupils about the case and the action which has been taken
- 6.10.13 notifying external agencies where appropriate
- 6.10.14 such other action as may appear to the Head to be appropriate.
- 6.11 **Monitoring:** The position should be monitored for as long as necessary thereafter. Action may include:
 - 6.11.1 sharing information with some or all colleagues and with pupils in the House so that they may be alert to the need to monitor certain pupils closely
 - 6.11.2 ongoing counselling and support
 - 6.11.3 vigilance
 - 6.11.4 mentioning the incident at meetings of staff
 - 6.11.5 reviewing vulnerable individuals and areas of the School.
- 6.12 **Supporting those severely impacted by bullying**
 - 6.12.1 The School recognises that removing bullied pupils from school is disruptive and can make it difficult to reintegrate. The primary aim is to support the victim so that they can continue to take a full part in school life. However, the School understands in some circumstances 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. Support from the School Mental Health Team will be offered in those circumstances.
 - 6.12.2 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.
 - 6.12.3 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.

7 **Record keeping:**

- 7.1.1 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.
- 7.1.2 School staff maintain records of the welfare and development of individual pupils. Every complaint or report of bullying is recorded centrally in the Bullying Incident File 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.
- 7.1.3 The Deputy Head will maintain a centralised record on CPOMS of all allegations or reports of bullying, including details of those involved and the action taken.

- 7.1.4 The Deputy Head 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.
- 7.1.5 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. The School's approach to data protection compliance is set out in the overarching 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. This includes the School's information security policy.

8 Risk assessment

- 8.1 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.
- 8.2 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.
- 8.3 The Head Master 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.]
- 8.4 Day to day responsibility to carry out risk assessments under this policy will be delegated to the Deputy Heads who have been properly trained in, and tasked with, carrying out the particular assessment.
- 8.5 Pupils are consulted as part of monitoring anti-bullying behaviour.

9 Monitoring of the policy

- 9.1 The Director of External Relations, with involvement from the Heads, will review and make revisions to this policy on an annual basis, or more regularly as required taking into account any guidance published by the DfE together with the record of any bullying incidents as set out in **Error! Reference source not found.** above.
- 9.2 The Board of Governors will consider the revisions made as part of its collective responsibility to carry out an annual review of safeguarding.

Authorised by	The Board of Governors
	March 2024
Next Review	Easter Term 2025

Appendix 1 Cyberbullying - guidance for pupils

- 1 The Department for Education's guidance Preventing and tackling bullying (DfE, 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"*.
- 2 Cyberbullying is bullying that takes place using technology.
 - 2.1 It can take the form of many behaviours including:
 - 2.1.1 harmful messages (text, instant, multimedia, email)
 - 2.1.2 impersonating another person online
 - 2.1.3 sharing private messages
 - 2.1.4 uploading photographs or videos of another person that leads to shame and embarrassment
 - 2.1.5 creating hate websites / social media pages
 - 2.1.6 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, the School's independent listener Andrew Gready on 07484 623835 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:
- <http://www.childnet.com/young-people>
- <https://www.thinkuknow.co.uk/>
- <https://www.childline.org.uk/Explore/Bullying/Pages/online-bullying.aspx>
- <https://www.ceop.police.uk/Safety-Centre/How-can-CEOP-help-me-YP/><https://www.childnet.com/resources/smartie-the-penguin>
- <https://www.saferinternet.org.uk/advice-centre/young-people>
- <https://www.disrespectnobody.co.uk/>
- <https://www.bbc.com/ownit>
- 5 Please see the School's Policy for Pupils on the Safe and Acceptable Use of ICT 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 Online safety policy and /or the Acceptable Use of ICT Policy for Pupils.
- 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 (DfE, November 2014).