

Riverstone Academy

Anti-Bullying Policy

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Signed: K Bowe

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Monitoring and review

Statement of intent

In a special primary school setting, pupils may have communication, sensory or social understanding differences that affect how bullying is experienced, expressed or reported. Staff therefore use a needs-led approach in all investigations.

Riverstone Academy believes that all pupils are entitled to learn in a safe and supportive environment; this means being free from all forms of bullying behaviour. This policy outlines how instances of bullying are dealt with, including the procedures to prevent occurrences of bullying.

These strategies, e.g. learning about tolerance and difference as part of the school's curriculum, aim to promote an inclusive, tolerant and supportive ethos at the school.

The Education and Inspections Act 2006 outlines several legal obligations regarding the school's response to bullying. Under section 89, schools must have measures in place to encourage good behaviour and prevent all forms of bullying amongst pupils. These measures are part of the school's Behaviour Policy, which is communicated to all pupils, school staff and parents.

All staff, parents and pupils work together to prevent and reduce any instances of bullying at the school. There is a zero-tolerance policy for bullying at the school.

Legal Framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- Education and Inspections Act 2006
- The Education (Independent School Standards) Regulations 2014, including Part 3, paragraph 10 (anti-bullying strategy)
- Equality Act 2010
- Protection from Harassment Act 1997
- Malicious Communications Act 1988
- Public Order Act 1986
- Communications Act 2003
- Human Rights Act 1998
- Crime and Disorder Act 1998
- Education Act 2011
- DfE (2017) 'Preventing and tackling bullying'.
- DfE (2018) 'Mental health and wellbeing provision in schools'
- DfE (2026) 'Keeping children safe in education 2026'

- DCMS, DSIT, and UK Council for Internet Safety (2024) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'.

This policy operates in conjunction with the following school policies:

- Behaviour Policy
- Child Protection and Safeguarding Policy
- Relationships, Sex and Health Education (RSHE) Policy
- Staff Code of Conduct and relevant HR procedures for concerns involving bullying or harassment of staff

Definitions

Intent and impact: Bullying often involves behaviour intended to cause harm; however, intent can be difficult to determine for some pupils with SEND, particularly where behaviour may arise from communication frustration, impulsivity, sensory overload or misunderstanding of social cues. The school will consider intent alongside impact, repetition, targeting and any real or perceived imbalance of power.

Some pupils may imitate behaviour without fully understanding its impact. The absence of clearly demonstrated intent will not prevent the school from acting where behaviour is repeated, targeted or harmful. Staff will consider the pupil's SEND, communication needs and developmental level while ensuring the safety and wellbeing of the pupil experiencing the behaviour remains paramount.

For this policy, "bullying" is defined as behaviour by an individual or group, usually repeated over time, that causes physical or emotional harm to another pupil and often involves a real or perceived imbalance of power. Bullying is generally characterised by:

- Repetition: Bullying is usually repeated over time, although a single serious incident may still require action under the Behaviour Policy and/or Child Protection and Safeguarding Policy.
- Intent and impact: Intent will be considered, but the impact of behaviour on the pupil experiencing it will also be given significant weight, particularly where SEND affects social understanding or impulse control.
- Targeting: Bullying is generally targeted at a specific individual or group.
- Power imbalance: Whether real or perceived, bullying is generally based on unequal power relations.

Vulnerable pupils are more likely to be the targets of bullying due to the attitudes and behaviours some young people have towards those who are different from themselves. Vulnerable pupils may include, but are not limited to:

- Pupils who are adopted.
- Pupils suffering from a health problem.

- Pupils with caring responsibilities.
- Pupils from socioeconomically disadvantaged backgrounds.
- Pupils with certain characteristics are also more likely to be targets of bullying, including, but not limited to:
 - Pupils who are LGBTQ+ or perceived to be LGBTQ+.
 - Pupils from minority ethnic backgrounds.
 - Pupils with SEND.

Types of Bullying

Staff will distinguish carefully between deliberate bullying and behaviour that may arise from SEND-related needs such as impulsivity, communication difficulty or sensory seeking. SEND-related factors will inform the response but will never be used to dismiss repeated, targeted or harmful behaviour or to reduce the protection provided to another pupil.

Many kinds of behaviour can be considered bullying, and bullying can be related to almost anything. Teasing another pupil because of their appearance, religion, ethnicity, gender, sexual orientation, home life, culture, or SEND are some of the types of bullying that can occur.

Bullying is acted out through the following mediums:

- Verbal
- Physical
- Emotional
- Online (cyberbullying)

Racist bullying: Bullying another person based on their ethnic background or skin colour. Racist bullying is a criminal offence under the Crime and Disorder Act 1998 and Public Order Act 1986.

Homophobic and bi-phobic bullying: Bullying another person because of their actual or perceived sexual orientation.

Transphobic bullying: Bullying based on another person's gender identity or gender presentation, or for not conforming to dominant gender roles.

Sexist bullying: Bullying based on sexist attitudes expressed in a way to demean, intimidate or harm another person because of their sex or gender. Sexist bullying may sometimes be characterised by inappropriate sexual behaviours.

Sexual bullying: Bullying behaviour that has a physical, psychological, verbal or non-verbal sexual dimension or dynamic that subordinates, humiliates or intimidates another person. This is commonly underpinned by sexist attitudes or gender stereotypes.

Ableist bullying: Bullying behaviour that focusses on another person's disability or support needs; this can include mocking the individual's disability or their needs, using derogatory words or slurs in relation to an individual's disability, or deliberately excluding an individual because of their disability.

Prejudicial bullying: Bullying based on prejudices directed towards specific characteristics or experiences, e.g. religion or mental health issues.

Relational bullying: Bullying that primarily constitutes excluding, isolating and ostracising someone – usually through verbal and emotional bullying.

Socioeconomic bullying: Bullying based on prejudices against the perceived social status of the victim, including, but not limited to, their economic status, their parents' occupations, their health or nutrition level, or the perceived "quality" of their clothing or belongings.

Roles and Responsibilities

The Directors are responsible for:

- Evaluating and reviewing this policy to ensure that it does not discriminate against any pupils based on their protected characteristics or backgrounds.
- The overall implementation and monitoring of this policy.
- Ensuring that all directors are appropriately trained regarding safeguarding and child protection at induction.
- Ensuring that the school adopts a tolerant and open-minded policy towards difference.
- Ensuring the school is inclusive.
- Analysing any bullying data to establish patterns and reviewing this policy considering these.
- Ensuring the DSL has the appropriate status and authority within the school to carry out the duties of the role.
- Ensuring a director works with the DSL to ensure the policies and practices relating to safeguarding, including the prevention of cyberbullying, are being implemented effectively.
- Ensuring that pupils are taught how to keep themselves and others safe, including online.

The Head Teacher is responsible for:

- Reviewing and amending this policy, accounting for new legislation and government guidance, and using staff experience of dealing with bullying incidents in previous years to improve procedures.

- Keeping a record of all reported incidents, including which type of bullying has occurred, to allow for proper analysis of the data collected. CPOMS is the system used to log any such incidents
- Analysing the data in CPOMS at termly intervals to identify trends, so that appropriate measures to tackle them can be implemented.
- Arranging appropriate training for staff members.

Teachers are responsible for:

- Using visual communication (PECs, symbols, emotion charts) to support pupils with limited verbal ability to express concerns.
- Monitoring non-verbal signs of distress or conflict.
- Being alert to social dynamics in their class.
- Being available for pupils who wish to report bullying.
- Providing follow-up support after bullying incidents.
- Being alert to possible bullying situations, particularly exclusion from friendship groups, and informing the pupil's class teachers or senior leaders of such observations.
- Refraining from stereotyping when dealing with bullying.
- Understanding the composition of pupil groups, showing sensitivity to those who have been the victims of bullying.
- Reporting any instances of bullying once they have been approached by a pupil for support.

Parents are responsible for:

- Informing their child's form tutor if they have any concerns that their child is the victim of bullying or involving in bullying in anyway.
- Being watchful of their child's behaviour, attitude and characteristics and informing the relevant staff members of any changes.

Pupils are responsible for:

- Informing a member of staff if they witness bullying or are a victim of bullying.
- Not making counter-threats if they are victims of bullying.
- Walking away from dangerous situations and avoiding involving other pupils in incidents.
- Keeping evidence of cyberbullying and informing a member of staff should they fall victim to cyberbullying.

Statutory Requirements

In accordance with Part 3, paragraph 10 of the Education (Independent School Standards) Regulations 2014, the proprietor will ensure that bullying is prevented, so far as reasonably practicable, by the drawing up and implementation of an effective anti-bullying strategy.

The school understands that, under the Equality Act 2010, it has a responsibility to:

- Eliminate unlawful discrimination, harassment, including sexual harassment, victimisation and any other conduct prohibited by the act.
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it.
- Foster good relations between people who share a protected characteristic and people who do not share it.

The school understands that, under the Human Rights Act (HRA) 1998, it could have charges brought against it if it allows the rights of pupils to be breached by failing to take bullying seriously. The Head Teacher will ensure that this policy complies with the HRA; the Head Teacher understands that they cannot do this without fully involving their teaching staff.

Although bullying itself is not a criminal offence, some types of harassment, threatening behaviour and/or communications may be considered criminal offences:

- Under the Malicious Communications Act 1988, it is an offence for a person to electronically communicate with another person with the intent to cause distress or anxiety, or in a way which conveys a message which is indecent or grossly offensive, a threat, or contains information which is false and known or believed to be false by the sender.
- The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct amounting to harassment.
- Section 127 of the Communications Act 2003 makes it an offence to send, by means of a public electronic communications network, a message, or other matter, that is grossly offensive or of an indecent, obscene or menacing character. It is unlawful to disseminate defamatory information through any media, including internet sites.
- Other forms of bullying which are illegal and should be reported to the police include violence or assault, theft, repeated harassment or intimidation, and hate crimes.

Prevention

Additional supervision, structured routines, visual social stories and personalised regulation strategies are used for vulnerable pupils.

The school will clearly communicate a whole-school commitment to addressing bullying and have a clear set of values and standards which will be regularly promoted across the whole school.

All members of the school will be made aware of this policy and their responsibilities in relation to it. All staff members will receive training in identifying and dealing with the different types of bullying.

Types of bullying will be discussed through the school's Relationships and Health Education and wider PSHE curriculum, in line with the Relationships and Health Education Policy.

The curriculum will explore and discuss issues at age-appropriate stages such as:

Healthy and respectful relationships.

- Boundaries and consent.
- Stereotyping, prejudice, and equality.
- Body confidence and self-esteem.
- How to recognise abusive relationships and coercive control.
- Harmful sexual behaviour, the concepts involved and why they are always unacceptable, and the laws relating to it.

Staff will encourage pupil cooperation and the development of interpersonal skills using group and pair work. Diversity, difference and respect for others will be promoted and celebrated through various lessons. Opportunities to extend friendship groups and interactive skills will be provided through participation in special events, e.g. drama productions, sporting activities and cultural groups.

Seating plans will be organised and altered in a way that prevents instances of bullying. Potential victims of bullying will be placed in working groups with other pupils who do not abuse or take advantage of others.

A safe place, supervised by a teacher, will be available for pupils to go to during their free time if they feel threatened or wish to be alone. The teacher supervising the area will speak to pupils to find out the cause of any problems and, ultimately, stop any form of bullying taking place.

Pupils deemed vulnerable will have regular check-ins with their class teacher or another trusted member of staff, where appropriate, so that concerns can be identified and acted upon quickly. Staff will maintain an open and accessible approach so pupils can report bullying whether they have experienced it themselves or witnessed it.

Before a new pupil joins the school, particularly where admission takes place in-year, the pupil's class teacher and the DSL will consider any known vulnerabilities and appropriate preventative measures. Where a new pupil is particularly vulnerable, this may include additional observation, communication support, structured peer support or intervention by the DSL.

The school will be alert to, and address, any mental health and wellbeing issues amongst pupils, as these can be a cause, or a result, of bullying behaviour.

The school will ensure potential perpetrators are given support as required, so their educational, emotional and social development is not negatively influenced by outside factors, e.g. mental health issues.

Signs of Bullying

Staff also track SEND-specific distress indicators such as increased stimming, withdrawal, dysregulation or regression in communication.

Staff will be alert to the following signs that may indicate a pupil is a victim of bullying:

- Being frightened to travel to or from school.
- Unwillingness to attend school.
- Repeated or persistent absence from school
- Becoming anxious or lacking confidence
- Saying that they feel ill repeatedly.
- Decreased involvement in schoolwork.
- Leaving school with torn clothes or damaged possessions
- Missing possessions
- Missing dinner money
- Asking for extra money or stealing
- Cuts or bruises
- Lack of appetite
- Unwillingness to use the internet or mobile devices.
- Lack of eye contact
- Becoming short tempered
- Change in behaviour and attitude at home.

Although the signs outlined above may not be due to bullying, they may be due to deeper social, emotional or mental health issues, so are still worth investigating. Pupils who display a significant number of these signs will be approached by a member of staff to determine the underlying issues causing this behaviour.

Staff will be aware of the potential factors that may indicate a pupil is likely to exhibit bullying behaviours, including, but not limited to, the following:

- They have experienced mental health problems, which have led to them becoming more easily aggravated.
- They have been the victim of abuse.
- Their academic performance has started to fall, and they are showing signs of stress.

If staff become aware of any factors that could lead to bullying behaviours, they will notify the pupil's form tutor, who will investigate the matter and monitor the situation.

Staff Principles

Staff consider communication difficulties, sensory overload and emotional regulation needs before determining whether behaviour is bullying.

The school will ensure that prevention is a prominent aspect of its anti-bullying vision.

Staff will treat reports of bullying seriously and will not ignore signs of suspected bullying. Staff will act immediately when they become aware of a bullying incident.

Unpleasantness from one pupil towards another will always be challenged and will never be ignored.

Staff will respect pupils' privacy and information about specific incidents will only be shared on a need-to-know basis. Staff will not promise confidentiality where safeguarding may be involved. If bullying may amount to child-on-child abuse, sexual harassment, sexual violence, exploitation, significant harm or another safeguarding concern, staff will report the matter to the DSL without delay and follow the Child Protection and Safeguarding Policy.

Follow-up support will be given to both the victim and perpetrator in the months following an incident to ensure all bullying has stopped.

Child on Child Abuse

The school has a zero-tolerance approach to all forms of child-on-child abuse, including sexual harassment and sexual violence.

To prevent child-on-child abuse and address the wider societal factors that can influence behaviour, the school will educate pupils about abuse, its forms, and the importance of discussing any concerns and respecting others through the curriculum, assemblies and PSHE lessons, in line with the section of this policy.

All staff will:

- Be aware that pupils of any age and gender can abuse their peers.
- Be aware that abuse can occur inside and outside of school settings.
- Be aware of the scale of harassment or abuse, and that just because it is not being reported does not mean it is not happening.
- Take all instances of child-on-child abuse equally seriously regardless of the characteristics of the perpetrators or victims.
- Never tolerate abuse as "banter" or "part of growing up", and will never justify sexual harassment, e.g. as "boys being boys", as this can foster a culture of unacceptable behaviours and one that risks normalising abuse.
- Be aware that child-on-child abuse can be manifested in many ways, including sending nudes, sexual harassment and assault, and hazing or initiation-type violence.
- Always challenge any harmful physical behaviour that is sexual in nature, such as inappropriate touching. Dismissing or tolerating such behaviours risks normalising them.

Sexual harassment can take many forms, including but not limited to:

- Telling sexual stories, making sexual remarks, or calling someone sexualised names.
- Sexual “jokes” or taunting.
- Deliberately brushing against someone.
- Displaying images or video of a sexual nature.
- Upskirting (this is a criminal offence).
- Online sexual harassment, e.g. creating or sharing sexual imagery, sexual comments on social media, or sexual coercion or threats.

Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled – this includes the process for reporting concerns about friends or peers. If a pupil has been harmed, is in immediate danger or is at risk of harm, a referral may be made to children’s social care services (CSCS) and potentially the police, where the DSL deems this appropriate in the circumstances.

All staff will be aware and sensitive towards the fact that pupils may not be ready or know how to tell someone that they are being abused. Pupils being abused may feel embarrassed, humiliated, scared, or threatened.

More information on the school’s approach to preventing and managing instances of child-on-child abuse can be found within this policy and the Child Protection and Safeguarding Policy.

The anti-bullying procedure will never be used as a substitute for safeguarding procedures. Where behaviour may constitute child-on-child abuse, sexual harassment, sexual violence, exploitation, significant harm or another safeguarding concern, the DSL will consider and act on the matter in accordance with Keeping Children Safe in Education 2026 and the school’s Child Protection and Safeguarding Policy.

Cyberbullying

Cyberbullying can take many forms and can go even further than face-to-face bullying by invading personal space and home life and can target more than one person. It can also take place across age groups and target pupils, staff and others, and may take place inside school, within the wider community, at home or when travelling. It can sometimes draw bystanders into being accessories.

Online safety is taught using visual, concrete methods adapted for cognitive level.

Cyberbullying can include the following:

- Threatening, intimidating or upsetting text messages
- Threatening or embarrassing pictures and video clips
- Disclosure of private sexual photographs or videos with the intent to cause distress.

- Silent or abusive phone calls
- Using the victim's phone to harass others, to make them think the victim is responsible.
- Threatening or bullying emails possibly sent using a pseudonym or someone else's name.
- Menacing or upsetting responses to someone in a chatroom
- Unpleasant messages sent via instant messaging.
- Unpleasant or defamatory information posted to blogs, personal websites and social networking sites, e.g. Facebook.

NB. The above list is not exhaustive, and cyberbullying may take other forms.

The school has a zero-tolerance approach to cyberbullying. The school views cyberbullying with the same severity as any other form of bullying and will follow the sanctions set out in this policy if they become aware of any incidents.

All members of staff will receive training on an annual basis on the signs of cyberbullying, to identify pupils who may be experiencing issues and intervene effectively.

Many of the signs of cyberbullying will be similar to those set out in the 'Signs of Bullying' section of this policy; however, staff will also be alert to the following signs that may indicate a pupil is being cyberbullied:

- Avoiding use of the computer
- Being on their phone routinely
- Becoming agitated when receiving calls or text messages

Staff will also be alert to the following signs which may indicate that a pupil is cyberbullying others:

- Avoiding using the computer or turning off the screen when someone is near
- Acting in a secretive manner when using the computer or mobile phone
- Spending excessive amounts of time on the computer or mobile phone
- Becoming upset or angry when the computer or mobile phone is taken away.

All learning at home will follow procedures outlined in the Remote Education Policy. During times when remote education is being utilised, the school will frequently be in contact with parents to make them aware of their activities online, but also to reinforce the importance of pupils staying safe online and explaining how filtering and monitoring procedures work.

Staff will be aware that a cyberbullying incident might include features different to other forms of bullying, prompting a particular response. Significant differences may include the following:

- Possible extensive scale and scope – pupils may be bullied on multiple platforms and using multiple different methods that are made possible by virtue of the bullying taking place online.
- The anytime and anywhere nature of cyberbullying – pupils may not have an escape from the torment when they are at home due to the bullying always continuing through technology.
- The person being bullied might not know who the perpetrator is – it is easy for individuals to remain anonymous online and on social media, and pupils may be bullied by someone who is concealing their own identity.
- The perpetrator might not realise that their actions are bullying – sometimes, the culture of social media, and the inability to see the impact that words are having on someone, may lead to pupils crossing boundaries without realising.
- The victim of the bullying may have evidence of what has happened – pupils may have taken screenshots of bullying, or there may be a digital footprint that can identify the perpetrator.

Staff and pupils will be instructed not to respond or retaliate to cyberbullying incidents. Evidence of the incident should be recorded, e.g. taking screenshots. Staff will report incidents to their line manager or the Head Teacher for the incident to be investigated and support to be provided. Pupils will report incidents to a trusted member of staff.

Where offensive content is posted online targeting a staff member or pupil, the person targeted will be encouraged to use the reporting mechanism on the website or social media platform to request its removal. Where the person who posted the content is known to the school, the Head Teacher will request that they remove it directly where this is safe and appropriate.

The school will support pupils who have been victims of cyberbullying by holding formal and informal discussions with the pupils about their feelings and whether the bullying has stopped, in accordance with this policy.

Any search of a pupil or examination, retention or deletion of data from a pupil's device will only be undertaken where lawful, necessary and proportionate, and in accordance with the school's Searching, Screening and Confiscation Policy and current statutory guidance. Safeguarding advice will be sought where images or other content may constitute evidence of abuse or a criminal offence, and staff will not view, copy or share indecent imagery except where permitted by safeguarding guidance.

Procedures

Interviews are adapted using visuals, simplified language, and communication aids.

Lower-level incidents will be reported to the relevant class teacher or senior leader, who will establish the facts, take appropriate action in line with the Behaviour Policy, and ensure the incident and outcome are recorded. Any safeguarding concern will be referred to the DSL without delay.

When investigating a bullying incident, the following procedures will be adopted:

- The pupil who has experienced the behaviour, the pupil alleged to have displayed the behaviour and any witnesses will usually be spoken to separately, using communication methods appropriate to their needs.
- Members of staff ensure that there is no possibility of contact between the pupils being interviewed, including electronic communication.
- If a pupil is injured, a designated first aider will assess the pupil and provide appropriate first aid. Further medical assistance will be sought where required, and any safeguarding concerns will be reported to the DSL.
- A room is used that allows for privacy during interviews.
- A witness is used for serious incidents.
- If appropriate, pupils involved may be asked to give an account of the incident. This may be written, verbal, visual or supported through symbols, AAC or other communication methods, with careful prompting that does not lead the pupil's account.
- The Head Teacher will gather evidence of a cyberbullying incident; this may involve text messages, emails, photos, etc. provided by the victim.
- Premature assumptions are not made, as it is important not to be judgmental at this stage.
- Members of staff listen carefully to all accounts, being non-confrontational and not assigning blame until the investigation is complete.
- All pupils involved are informed that they must not discuss the interview with other pupils.

Due to the potential for some specific forms of bullying to be characterised by inappropriate sexual behaviour, staff members involved in dealing with the incident are required to consider whether there is a need for safeguarding processes to be implemented.

Sanctions

Responses and consequences will be developmentally appropriate, proportionate and consistent with the Behaviour Policy, with emphasis on teaching safer and more appropriate replacement behaviours rather than relying solely on punitive consequences.

If the Head Teacher is satisfied that bullying took place, the pupil who displayed the bullying behaviour will be supported to understand the impact and consequences of their actions and what must change. An appropriate response or consequence will be applied in line with the Behaviour Policy, taking account of the pupil's age, developmental level, SEND and the seriousness and persistence of the behaviour.

Restorative work, reconciliation or an apology may be considered where safe, appropriate and beneficial. These approaches will never be compulsory and will only

involve the pupil who has experienced bullying where they wish to participate and staff are satisfied that doing so will not cause further distress or risk.

Parents are informed of bullying incidents and what action is being taken.

All staff involved in managing instances of bullying will be aware that taking disciplinary action and providing support are not mutually exclusive actions and should be conducted simultaneously to encourage more positive behaviour in future.

The school will avoid unnecessarily criminalising pupils for bullying or abusive behaviour where possible, as young people with criminal records face stigma and discrimination in future aspects of their lives. The school's focus when handling perpetrators will be supporting them to develop more positive behaviours and to refrain from abusive and bullying behaviours in the future.

The school will remain cognisant of the fact that continued access to school can be important for rehabilitation of harmful behaviour and will not exclude pupils unless as a last resort – where there have been serious or consistent incidents of bullying, the school will act in line with the Behaviour Policy.

Support

Pupils with SEND receive personalised emotional regulation and sensory support, in collaboration with parents and specialists.

In the event of bullying, pupils who have experienced bullying will be offered the following support:

- Emotional support and reassurance from the school and the option to engage with external counselling provided by the school.
- Reassurance that it was right to report the incident and that appropriate action will be taken.
- Liaison with their parents to ensure a continuous dialogue of support.
- Advice not to retaliate or reply, but to keep the evidence and show or give it to their parent or a member of staff.
- Advice on aspects of online safety, in the event of cyberbullying, to prevent re-occurrence, including, where appropriate, discussion with their parents to evaluate their online habits and age-appropriate advice on how the perpetrator might be blocked online.
- Discussion with their parent on whether police action is required (except in serious cases of child exploitation or abuse where the police may be contacted without discussion with parents)

The Head Teacher will consider in each case whether it is appropriate to separate pupils or adjust classes, groups, transitions or unstructured times in order to prevent further harm. Any such decision will prioritise the safety and wellbeing of the pupil who has experienced bullying while avoiding unnecessary disadvantage.

Staff, including the DSL where appropriate, will work with the pupil who has experienced bullying to provide reassurance, emotional support and appropriate strategies, without implying that responsibility for preventing further bullying rests with that pupil.

The school recognises that bullying behaviour may indicate underlying social, emotional, mental health, communication or environmental needs. The pupil displaying bullying behaviour will be offered needs-led support, which may include pastoral work, targeted teaching, therapeutic support or referral through appropriate local pathways. Support will not replace appropriate consequences or safeguarding action where these are required.

Follow up Support

Multi-agency involvement (SaLT, EP, CAMHS) is used where appropriate.

The progress and wellbeing of both the pupil who experienced bullying and the pupil who displayed the behaviour will be monitored by their class teachers and relevant pastoral or safeguarding staff. Individual check-ins may be used where appropriate, and parents will be updated according to the needs and circumstances of the case.

Pupils who have experienced bullying will receive ongoing support for as long as needed. The school will review whether the behaviour has stopped and whether the pupil feels safe, using communication approaches appropriate to the pupil. Reviews will continue at a frequency proportionate to the level of concern until staff and the pupil are satisfied that the risk has reduced and the bullying has ceased.

Pupils who have displayed bullying behaviour will be supported in the following ways:

- Receiving a consequence for their actions
- Being able to discuss what happened.
- Being helped to reflect on why they became involved.
- Being helped to understand what they did wrong and why they need to change their behaviour.
- Appropriate assistance from parents

Pupils who have experienced bullying will be considered on a case-by-case basis and, where additional mental health or therapeutic support is required, the school will seek support or make referrals through appropriate local health, social care or specialist pathways.

In exceptional cases where the effects of bullying are so severe that a pupil cannot safely or successfully reintegrate, the Head Teacher and DSL will work with the pupil, parents, placing local authority and relevant professionals to identify appropriate support and next steps. A change of placement will only be considered where this is in the pupil's best interests and through the appropriate statutory process.

Where a pupil who has been the victim of bullying has developed such complex needs that alternative provision is required, the pupil, their parents, the Head Teacher and DSL will meet to discuss the use of alternative provision.

Bullying Outside of School

Pupils with SEND may need support using communication aids to report concerns.

Staff will remain aware that bullying can happen both in and outside of school and will ensure that they understand how to respond to reports of bullying that occurred outside school in line with the Child Protection and Safeguarding Policy.

The Head Teacher has a specific statutory power to sanction pupils for poor behaviour outside of the school premises. Section 89(5) of the Education and Inspections Act 2006 gives the Head Teacher the power to regulate pupils' conduct when they are not on school premises, and therefore, not under the lawful charge of a school staff member.

Teachers have the power to sanction pupils for misbehaving outside of the school premises. This can relate to any bullying incident occurring anywhere off the school premises, e.g. on school or public transport, outside the local shops, or in a town or village centre.

Where bullying outside school is reported to school staff, it will be investigated and acted upon. In all cases of misbehaviour or bullying, members of staff can only sanction the pupil on school premises, or elsewhere when the pupil is under the lawful control of the member of staff, e.g. on a school trip.

The Head Teacher is responsible for determining whether it is appropriate to notify the police of the action taken against a pupil. If the misbehaviour could be of a criminal nature or poses a serious threat to a member of the public, the police will be informed.

Record Keeping

Records include SEND-related factors, sensory triggers and communication needs.

The DSL will ensure that robust records are kept with regard to all reported or otherwise uncovered incidents of bullying – this includes recording where decisions have been made, e.g. sanctions, support, escalation of a situation and resolutions.

The Head Teacher and DSL will ensure that all decisions and actions recorded are reviewed on a regular basis for the purposes of:

- Identifying patterns of concerning, problematic or inappropriate behaviour on the part of certain pupils that may need to be handled, e.g. with pastoral support.
- Reflecting on whether cases could have been handled better and using these reflections to inform future practice.

- Considering whether there are wider cultural issues at play within the school, e.g. whether school culture facilitates discriminatory bullying by not adequately addressing instances and planning to mitigate this.
- Considering whether prevention strategies could be strengthened based on any patterns in the cases that arise.
- Responding to any complaints about how cases have been handled.

The Head Teacher will provide the Directors with termly anonymised information on bullying incidents and trends, including repeat incidents, prejudice-based bullying, cyberbullying, safeguarding escalations, actions taken and the effectiveness of prevention strategies. The Directors will use this information to assure themselves that the school's anti-bullying strategy is effective and that Part 3, paragraph 10 of the Independent School Standards is being met.

Monitoring and review

Policy reviews assess effectiveness of SEND-adapted procedures.

This policy is reviewed annually by the Head Teacher, DSL and Directors.