



APPLEFORD SCHOOL ANTIBULLYING (COUNTERING BULLYING) POLICY

This policy applies to the whole school, including boarding.

The Policy is publicly available on the school website and upon request a copy (which can be made available in large print or other accessible format if required) may be obtained from the School Office. All who work, volunteer or supply services to our school have an equal responsibility to understand and implement this policy and its procedures both within and outside of normal school hours including activities away from school.

We have a whole school approach to safeguarding, which is the golden thread that runs throughout every aspect of the school. All our school policies support our approach to safeguarding (child protection). Our fundamental priority is our children and their wellbeing; this is first and foremost.

This policy also takes into consideration the National Minimum Standard (NMS) for residential special schools (RSS).

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Safeguarding is everyone's responsibility. Our approach at Appleford School is child-centred and at all times, we will act in the best interests of the child. All who work, or volunteer or supply services to our school have an equal responsibility to understand and implement this policy and its procedures both within and outside of normal school hours, including activities away from school. All employees and volunteers are required to sign that they have read, understood and will abide with our 'Child Protection Policy', 'Keeping Children Safe in Education (KCSIE) part one' and for those who work directly with children 'KCSIE Annex A'. This policy takes full account of the child protection procedures agreed by the Wiltshire Safeguarding Vulnerable People Partnership (SVPP) along with our Safer Recruitment Policy, Whistleblowing Policy, Staff Behaviour policy, and The Teachers' Standards.

Legal Status: This policy complies with, The Education (Independent School Standards) (England) Regulations currently in force, Keeping Children Safe in Education (DfE: September 2024) and the National Minimum Standards (NMS) for Residential Special Schools (RSS) (DfE: September 2022) along with a reference to:

Prepared with reference to:

- [Keeping Children Safe in Education \(KCSIE September 2024\)](#)
- [Working together to safeguard children \(Currently in force\)](#)
- [Preventing and Tackling Bullying: Advice for Headteachers and Governing Bodies \(DfE: currently in force\)](#)
- [Behaviour in schools - Advice for Headmasters and school staff](#) (DfE, 2022)
- Protecting children from cyber bullying (NSPCC: updated February 2022)
- [Family Lives: Cyberbullying "Cyberbullying: Advice for Headteachers and School Staff"](#) (November 2014)
- ["Cyberbullying Guidance: Understand, Prevent and Respond"](#) – (Childnet International, 2016)
- ["Sharing nudes and semi-nudes: advice for education settings working with children and young people"](#) – (DfE, February 2024)
- Has regard to the [Equality Act 2010](#) and the [Public Sector Equality Duty](#)

Related Documents:

- Online Safety including ICT-Based Forms of Abuse (including Cyber-Bullying) Policy
- Anti-Bullying: Parents and Pupils Information Sheets, Anti-Bullying Code, What to do if you are Worried
- Positive Behaviour Management Policy (including Sanctions, Rewards, and Exclusions), The School Rules
- Safeguarding Policy and Procedures including Child Protection

Appleford School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. It is our aim that all children fulfil their potential

- Personal, Social, Health, Economic Education (PSHEE) and Citizenship (Inclusive on RSE)
- Sexual Violence and Sexual Harassment policy inclusive of Child-on Child- abuse policy.

Applies to:

- The whole school along with all activities provided by the School, including those outside of the normal school hours;
- all staff (teaching, support and supply staff), contractors, pupils on placement, the proprietor and volunteers working in the School.

Monitoring and Review: This policy is subject to continuous monitoring, refinement and audit by Dr Peter Gardner (Managing Director), the Advisory Board and Mr David King (Headmaster). The Proprietor will undertake a full annual review of this policy and procedures, inclusive of its implementation and the efficiency with which the related duties have been discharged. This discussion will be formally documented in writing. Any deficiencies or weaknesses recognised in arrangements or procedures will be remedied immediately and without delay. All staff will be informed of the update/reviewed policy and it is made available to them in either a hard copy or electronically.

Signed:

Policy Agreed: September 2024

Date Published: September 2024

Next Review: September 2025



Dr Peter Gardner
Directing Lead and Proprietor



Mr David King
Headmaster and Company Director

Designated Member of Staff responsible for Anti-Bullying: Mr David King, The Headmaster, has overall responsibility for managing anti-bullying in conjunction with the Head of Pastoral Care. Additionally, the Headmaster has oversight of Behaviour Management at the School.

Statement of Intent: Appleford School's Anti-bullying Policy is dovetailed with the Behaviour Management Policy (with support for the victim and the bully) and makes it clear what the sanctions are for bullying. Appleford School is committed to providing a caring, friendly, safe and secure environment for all of our children so they can learn in a relaxed and secure atmosphere, without anxiety. Bullying in any form is unacceptable at Appleford School. Our response to bullying does not start at the point at which a pupil has been bullied. This policy sets out the preventative measures we take in order to create an ethos and environment that keeps bullying from becoming a problem in the first place.

We aim to make all those connected with the School aware of our opposition to bullying, and we make clear each person's responsibilities with regard to the minimisation of bullying in our school. If bullying does occur, all pupils should be able to tell any member of staff and know that incidents will be dealt with promptly and effectively. We are a TELLING School. This means that anyone who knows that bullying is happening is expected to tell the staff. Posters to this effect are displayed in the School. All adult members of our school community should be vigilant in order to recognise where bullying is taking place, and to deal with it thoroughly and with sensitivity. Records are kept to evaluate the effectiveness of the approach or to enable patterns to be identified.

What is bullying? Definition of Bullying: Bullying can be defined as 'behaviour by an individual or group, that intentionally hurts another individual or group either physically or emotionally'. Bullying can take many forms (for instance, cyber-bullying via text messages, social media or gaming, which can include the use of images and video, and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, special educational needs or disabilities, or because a child is adopted, in care or has caring responsibilities. It might be motivated by actual differences between children, or perceived differences.

Stopping violence and ensuring immediate physical safety is our school's first priority, but emotional bullying can be more damaging than physical; the School will make judgements about each specific case. Bullying also involves an imbalance of power between the perpetrator and the victim. This could involve perpetrators of bullying having control over the relationship which makes it difficult for those they bully to defend themselves. The imbalance of power can manifest itself in several ways, it may be physical, psychological (knowing what upsets someone), derive from an intellectual imbalance, or by having access to the support of a group, or the capacity to socially isolate. It can result in the intimidation of a person or persons through the threat of violence or by isolating them either

physically or online.

Low-level disruption and the use of offensive language can in itself have a significant impact on its target. If left unchallenged or dismissed as banter or horseplay it can also lead to reluctance to report other behaviour. Appleford School ensures early intervention to help set clear expectations of behaviour that is and isn't acceptable and help stop negative behaviours escalating.

A Potentially Criminal Activity: Though bullying in itself is not a specific criminal offence in the UK, it is important to bear in mind that some types of harassing or threatening behaviour - or communications - could be a criminal offence, for example under the Protection from Harassment Act 1997, the Malicious Communications Act 1988, the Communications Act 2003, and the Public Order Act 1986. If as a school, we feel that an offence may have been committed we would seek assistance from the police.

Bullying – Child Protection Related Issues: A bullying incident is treated as a child protection concern when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. In such cases the school reports its concerns to the Wiltshire Council Children's Social Care via the Multi Agency Safeguarding Hub (MASH) by telephone on **0300 456 0108** during office hours or the out-of-hours Duty Team (evenings and weekends) on **0300 456 0108** Any kind of bullying is unacceptable.

Bullying can be:

- *Emotional (indirect bullying) including isolation of others by a refusal to co-operate with them and exclusion* - being unfriendly, excluding, tormenting (e.g. hiding books, threatening gestures), deliberately excluding from social groups or an activity by refusal to sit next to/ talk to/ work/ co-operate with others and refusal to follow staff instructions to do the above, or malicious rumours, e-mails or text messages, and also exclusion from play/discussions etc. with those whom they believe to be their friends.
- *Physical harm or its threat including the abuse of personal property* – jostling, serious fighting, pushing, kicking, spitting, hitting, taking or hiding belongings, punching or any use of violence; deliberately destroying or damaging work or possessions or removing personal property, use of weapons/threatening use of weapon (or any object which could be used as a weapon), intimidation through physical gestures and actions.
- *Online: Cyber* – not occurring face to face but rather through electronic means including, but not limited to, social networking sites, internet and intranet sites, email, instant messaging, by mobile phone including through text messages and phone calls, photographs both real and manipulated and so on. For more details of this see the specific ICT-Based forms of abuse (including Cyber Bullying) Policy.
- *Racist* - Bullying directed at individuals of a certain race, culture, ethnicity, language, faith, community, national origin or national status. The distinctive feature of racist bullying is that the victim is attacked not as an individual but as the representative of a family, community or group. This is an area where schools are required to keep statistics about incidents.
- *Cultural* – focusing on and/or playing off perceived cultural differences or similar.
- *Sexist* – covers a wide range of behaviour from name calling to physical sexual assault. It is the use of sexual language or negative stereotyping on the basis of gender.
- *Sexual* - is unwanted or inappropriate physical contact or sexual innuendo, and may include the sharing of nudes or semi-nudes.
- *Homophobic* - This is bullying which is directed towards people who are openly gay, bisexual, are perceived as gay, or show characteristics. Heterosexual young people subject to homophobic bullying are less reluctant to report it as this may enforce the stereotypical way that they are already viewed by others so sensitivity and positive support is required for victims.
- *Religious* – Attacking faith, belief, religious practice or custom.
- *Special Educational Needs and Disability* – remarking upon, drawing attention to, or discriminating against persons with physical disabilities or learning difficulties or other identified special educational needs such as emotional and behavioural disabilities (EBD) and Specific Learning Difficulties (SLD) - Dyslexia, Dyscalculia and Dyspraxia.
- *Verbal* - Name-calling, sarcasm, spreading rumours, making snide comments, teasing, humiliating others, threatening others, inciting others to humiliate and threaten others.
- *Written* – Spreading rumours, writing or printing unkind or malicious on paper.

Bullying can also include initiation / hazing type violence and rituals. (Please see our Child Protection Policy): We believe that all children and staff should be able to work and play without any fear of being bullied by any other person. Bullying is not tolerated and all accusations are to be taken seriously and dealt with. Bullying can take place between pupil and pupil, staff and staff or staff and pupil. We consider the pastoral care of the staff and children to be of prime importance. In class this role largely rests with the class teacher. It is school policy that any misdemeanour will be dealt with by the member of staff present when it occurs, whether in the

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playground, classroom, cloakroom or any part of the School. A common code of behaviour is expected from everyone in the School (see Behaviour Policy). All staff and volunteers at Appleford School are expected to treat each other with a professional level of respect.

We have clear procedures to follow including who to tell and how to record bullying to enable patterns to be identified. We raise awareness of staff through training, so that the principles of the school policy are understood, legal responsibilities are known, action is defined to resolve and prevent problems and sources of support are available. We take action to reduce the risk of bullying at times and in places where it is most likely. We invest in specialised skills to understand the needs of the children, including those with special educational needs or disabilities, and 'lesbian, gay, bisexual and transgender' (LGB&T) pupils. We are aware that within a residential setting, a boarder being bullied by another boarder may not be able to escape from the bully.

Online Safety: In accordance with legislative requirements we have a whole school approach to online safety including online radicalisation. This includes annual update training for staff regarding on-line safety. To support our parents/carers in their education of online safety, the School also organises annually an awareness session for parents with regards to Online Safety. We expect all pupils to adhere to the safe use of the internet as detailed in our Online Safety Policy. The active management of hardware, software and connectivity and vigilance of teachers and parents has an active part to play in the protection of pupils from Cyber-Bullying incidents. Pupils will have access to technologies that have both positive and negative potential. Our policy on the use of technology within the school setting and beyond is understood and respected by staff and it is important the pupils and the wider school community also respect this policy.

Within our Online policy, we have clearly defined roles and responsibilities for online safety as part of the school's wider safeguarding strategy and how this links with our main safeguarding policy (please refer to Safeguarding Child Protection policy cited in related documents). There is clear guidance on the use of technology in the classroom and beyond for all users within the school's Online Safety policy that references permissions/restrictions and agreed sanctions. The school's Online policy also delineates detail into the school's technical provision and infrastructure, including the safeguards in place to filter and monitor inappropriate content and alert the School to safeguarding issues (please refer to e-safety policy).

The policy also details how the school builds resilience in its pupils to protect themselves and their peers through education and information. Our staff receive training into the professional development of safeguarding techniques that include online safety (please refer to Online and safeguarding policies). There are reporting mechanisms available for all users to report issues and concerns to the School and how they are managed and/or escalated (please refer to Online Safety policy including ICT acceptable use policy). The management of all personal data is in line with statutory requirements.

Cyber-bullying: Cyberbullying (or online bullying) is bullying using technologies, particularly over the internet or via mobile and gaming networks. (ChildNet) Cyber-bullying is a different form of bullying that can happen 24/7, with a potentially bigger audience, and more accessories as people forward on content at a click. Wider search powers included in the 2011 Education Act give schools stronger powers to tackle cyber-bullying by providing a specific power to search for and, if necessary, delete inappropriate images (or files) on electronic devices, including mobile phones.

Here are some examples of cyber-bullying:

- **Text message bullying** – sending unwelcome texts that are threatening or cause discomfort.
- **Picture/video clip bullying via mobile phone cameras** or webcam, including Upskirting including sending or posting messages or images of the victim without their explicit consent.
- **Phone call bullying** – can include silent calls or abusive messages. Sometimes the bullied person's phone is stolen and used to harass others, who then think the phone owner is responsible.
- **Email bullying** – sending bullying or threatening messages, often using someone else's name to pin the blame on them.
- **Chat room bullying** – involves sending menacing or upsetting responses to children or young people when they are in a web-based chat room.
- **Bullying through instant messaging (IM)** – where children and young people are sent unpleasant messages as they conduct real-time conversations on line.
- **Bullying via social networking websites** – includes the insulting blogs, personal websites and online personal polling sites. There has also been a significant increase in social networking sites for young people, which can provide new opportunities for cyber-bullying (Facebook, Instagram, Twitter, Snapchat, etc).

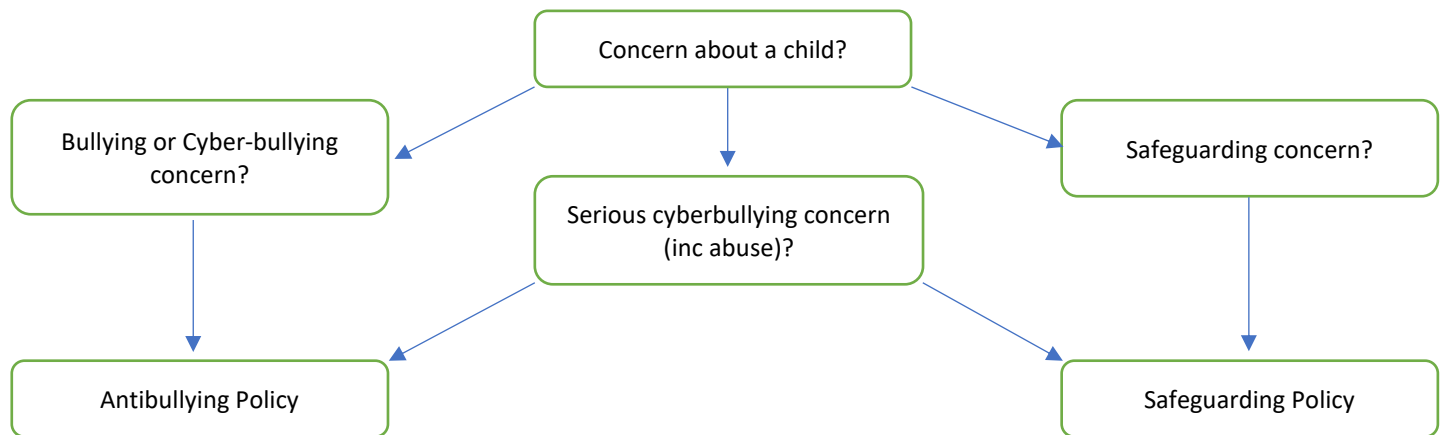
- **Sexting** (also called youth-generated sexual imagery) – young people (under 18) who share sexual imagery of themselves, or peers, are breaking the law. There is, unfortunately, scope for this fact to be exploited as bullying.

Responding to Cyber-Bullying: If the school were to find that a member of the school community was involved in cyber-bullying, our approach would follow the same procedures as the other types of bullying identified, including our child protection procedures where appropriate. This may include working with the police in serious cases.

Concerns flow chart: In accordance with KCSIE (DfE: September 2024), the main placement and details regarding Cyberbullying are now embedded within our Anti-Bullying policy. This is because how it is responded to, will align with all other types of bullying (unless there are specific safeguarding concerns, which refers back to the Safeguarding Child Protection Policy).

In our Online Safety Policy, reference is made to Cyber-bullying (e.g. the definition and that our response is in line with our Anti-bullying policy) which then signposts to our main antibullying policy.

In our Safeguarding Policy, reference is made to cyber-bullying and online-sexual/non-sexual abuse and how these issues will be responded to (referencing the Anti-bullying policy) dependent on that case.



Cyberbullying differs from “ordinary” bullying and can have a far greater impact because of a number of factors including:

- invasion of personal space – the victim can never escape it;
- the potential anonymity of the bully;
- The ability to broadcast upsetting messages and images rapidly to a potentially huge audience and to continue to do so repeatedly over a long period of time;
- Other pupils, who may not normally become involved in bullying behaviour, may be drawn in unwittingly by, for example, forwarding or circulating an image or message.

Pupils should remember the following:

- Always respect others - be careful what you say online and what images you send.
- Think before you send - whatever you send can be made public very quickly and could stay online forever.
- Don't retaliate or reply online.
- 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.
- Block the bully. Most social media websites and online or mobile services allow you block someone who is behaving badly.
- Don't do nothing - if you see cyberbullying going on, support the victim and report the bullying.

We will offer parents information sessions on the dangers of cyber-bullying and on-line child protection issues at regular intervals. Our ICT Co-ordinator has a duty to deliver age-appropriate guidance and information on cyber-bullying to all of our pupils.

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Online Forms of Abuse (Also see our Safeguarding Child Protection Policy): Information and communication technology (ICT)-based forms of child physical, sexual and emotional abuse can include bullying via mobile telephones or online (internet) with verbal and visual messages. This can also include child sexual abuse. All staff are alert to the signs that a child may be at risk of may have been abused online and will follow the school's child protection procedures (Please see our Child Protection Policy for more details).

Parental complaint or complaint from a child:-

- Headmaster / Director of Studies / Head of Boarding to be notified and to be kept fully informed at each stage
- Headmaster / Director of Studies / Head of Boarding to contact the parents who have made the complaint.

Signs and Symptoms: A child may indicate by signs or behaviour that he or she is being bullied. Adults should be aware of these possible signs and that they should investigate if a child:

is frightened of walking to or from school	attempts or threatens suicide or runs away
doesn't want to go on the school / public bus	cries themselves to sleep at night or has nightmares
begs to be driven to school	feels ill in the morning
changes their usual routine	begins to do poorly in school work
is unwilling to go to school (school phobic)	comes home with clothes torn or books damaged
begins to truant	has possessions which are damaged or " go missing"
becomes withdrawn anxious, or lacking in confidence	asks for money or starts stealing money (to pay bully)
starts stammering	has dinner or other monies continually "lost"
has unexplained cuts or bruises	is bullying other children or siblings
becomes aggressive, disruptive or unreasonable	stops eating
is frightened to say what's wrong	gives improbable excuses for any of the above
is afraid to use the internet or mobile phone	is nervous and jumpy when a cyber message is received

These signs and behaviours could indicate other problems, but bullying should be considered a possibility and should be investigated. Children are encouraged to share their concerns with the adults responsible for them. Staff will consult with the Headmaster or other Senior Management knowing that their response will be sympathetic and appropriate.

What Should the Pupils Tell an Adult?

Who has been bullying you?	How long has this been going on?
How many times has this happened to you?	Has anyone seen this happen? If so, who?
Has anyone else been bullied by the same person?	Have you told anyone else about this before?
Was anything done about it?	Have you done anything unhelpful that has not helped the situation?

What Should a Pupil Do If They Witness Bullying? : If any pupil is being bullied or someone who is being bullied is identified, they should report what is happening to someone else.

- Tell an adult in school
- Inform one of the Anti-bullying ambassadors or a prefect who will then inform an adult without delay.

Reporting a bully does NOT count as 'telling tales'.

Bullying can only be stopped if someone is told.

Everyone has an important duty to help stop bullying, even as a bystander.

What Should Parents Do About Bullying? Inform the School if they think their child is being bullied or is bullying other children. Try to establish the facts and keep an open mind. The symptoms at home of children being bullied or who are bullying can sometimes be very similar. With older children it might be useful to refer to this policy and the Home-School Agreement.

Why is it Important to Respond to Bullying? Bullying hurts. No one deserves to be a victim of bullying. Everybody has the right to be treated with respect. Bullying children need to learn different ways of behaving. The School has a responsibility to respond promptly and effectively to issues of bullying. Bullying is an extremely serious matter. It can cause psychological damage and even lead to suicide. It is worth remembering that in certain cases bullying can constitute harassment and threatening behaviour and as such is

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principle subject to criminal sanctions, demonstrating how serious it is. Pupils who are bullying need to learn different ways of behaving. We have a responsibility to respond promptly and effectively to issues of bullying. Handling of a bullying incident is given much thought to ensure that the facts are fully known, agreed and understood by the bully(/ies) and the victim(s). All children in our school will be informed about bullying. They will be made aware that we are a 'telling school' they must tell an adult if they or someone else is being bullied and that this is not telling tales. Children will be encouraged to talk to their Group Tutor, Headmaster, Director of Studies, Head of Boarding, support staff or parents.

Our Policy and Procedures are concerned with the following:

- To provide a clear framework for dealing with incidents of bullying;
- Proprietor; Headmaster; employees; children and parents should have an understanding of what constitutes bullying, through appropriate training etc;
- To encourage openness in which pupils, staff and parents act immediately if there is any suspicion of bullying;
- Proprietor and staff should know what the school policy is on bullying, and follow it when bullying is reported;
- To ensure that parents and the school community are aware of the pupils' right to be protected from physical, written and oral abuse or intimidation and to educate pupils in resisting bullying;
- To create and maintain a non-violent and non-threatening atmosphere in the School through a combination of regular staff training and educational opportunities that arise such as Personal Social Health Economic Education (PSHEE) lessons, English lessons, drama, literature, historical events, the involvement of guest speakers, assemblies and so on to highlight the essential anti-bullying messages and maintain awareness of potential problems;
- To raise awareness of staff through training, taking action to reduce the risk of bullying at times and in places where it is most likely;
- To ensure that as a result of staff being respectful towards pupils at all times, pupils will internalise and model these human encounters and thus treat each other respectfully;
- To increase the sensitivity of the school community to incidents of bullying;
- To provide support and help for victims of bullies and for bullies themselves;
- To make clear to pupils, staff, parents and guardians that bullying is unacceptable, including promoting a transparency in human relationships so that pupils, by default, are held to account for the feelings they may evoke in others - Bullying will not be tolerated;
- To educate pupils in resisting bullying;
- To ensure that the adults in the pupils' world do not endeavour to diminish pupils so that they lose respect amongst their peer group but rather enhance them, so as to continue to develop their self-esteem;
- To support those being bullied, and build a framework, within which those bullying others may recognise and reform their behaviour.

The DSL is responsible for coordinating and monitoring the response to a bullying incident and will arrange support and review processes. Information regarding bullying incidents be monitored and feedback will be given to specific staff as appropriate, and more broadly during staff training. The Headmaster also monitors behaviour and any cases of bullying to enable patterns to be identified and effective responses planned.

Anti-Bullying Strategies Adopted by Appleford School:

- To acknowledge that the problem of bullying exists everywhere in our society including potential for it here at Appleford.
- Ask pupils what they feel constitutes bullying. Discussions about what is and is not bullying can help establish support mechanisms to help pupils who are being bullied.
- Anti-bullying ambassadors are put in place throughout the School. These are a group of pupils formed through a voluntary scheme. The ambassadors encourage peer support schemes such as buddying and peer listening.
- We have a whole school approach in which pupils and adults work together to create an environment where bullying is not tolerated.
- We involve our pupils in anti-bullying activities within the classroom. Using these educational elements, we discuss differences between people and the importance of avoiding prejudice-based language.
- Appleford School finds ways to help those who are bullying change their behaviour. Punishing bullies doesn't end bullying. It is important to stress that it is the behaviour that is not liked, rather than the person.
- Bullying often takes place in groups. Pupils have a choice of watching from the margins, joining in, trying to remain uninvolved or trying to help those being bullied. Acknowledge and reward pupils who help prevent bullying.

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- Support schemes that encourage pupils to make friends. Having friends is one of the best defences against bullying, but not everyone has the right social skills to make friends easily. Teaching assertiveness skills and confidence-building to the class may be a way to help pupils make friends.
- Use time during PSHE classes to work on activities which explore bullying/intimidation in general.
- There are strategies for introducing new pupils to Appleford School. All new pupils are allocated a guide/buddy for their first two weeks, and all Appleford pupils look out for one another.
- Assemblies remind pupils and staff of the School's policy on bullying and reinforce the message that we are a telling school and that bullying will not be tolerated.

Teachers support all pupils in their class to establish a climate of trust and respect for all. By praising, rewarding and celebrating the success of all pupils, we aim to prevent incidents of bullying. Staff are continually watchful and available, promoting good behaviour and encouraging the care of others. Colleagues' report all cases of bullying on CPOMS. Parent's involvement and cooperation can be sought in the case of persistent offenders after consultation with the Headmaster.

Methods

We watch for early signs of distress in pupils.	We listen, believe and act when a child tells us that he or she is being bullied.
We intervene to stop the child who is bullying from harming the other child or pupils.	We explain to the child doing the bullying why his or her behaviour is unacceptable.
We give reassurance to the child or pupils who have been bullied.	We help the child who has done the bullying to recognise the impact of his or her actions.
We emphasise the importance of pupils informing staff of any incidents of bullying that occur.	

If an allegation of Bullying is disclosed or if there is a concern: members of staff to whom disclosures are made should initiate the following procedures themselves and/or consult with the relevant staff as appropriate. All disclosures, whether from a pupil, a parent or a member of staff, should be taken seriously and treated with sensitivity. The victim should be made aware that his/her safety is considered to be of paramount importance. Parents will always be informed if their child has been found to be either a victim or a perpetrator of a bullying incident. All instances of suspected bullying should be recorded on CPOMS by the person reporting it. This is read by the Head of Pastoral and Pastoral Team, class Tutor, Houseparent. The Headmaster is informed.

If an incident of bullying is reported, the following procedure will be adopted:

1. The member of staff to whom the incident was reported, or who first discovers the situation, will lead the situation (the "Case Handler"), and will reassure and support the pupils involved, without promising absolute confidentiality;
2. The Case Handler will inform an appropriate member of the School's pastoral team about the bullying allegation as soon as possible;
3. Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm', staff should follow the procedures set out in the Appleford's Safeguarding and Child Protection Policy rather than the procedure set out below;
4. The victim(s) and the alleged perpetrator(s) will each be interviewed individually by the Case Handler on their own (or, if appropriate, with a suitable person present for support) and asked to write their account of events;
5. Where the Case Handler considers that the reported bullying behaviour may be criminal, or considers that there may be a risk of harm to someone, the Case Handler will discuss this with the Headmaster, and will report the matter to the Police without delay, if considered necessary. The School will then follow the procedures set out in the Safeguarding and Child Protection Policy as well as any guidance from the Police;
6. The incident/s should be recorded on a school incident form and signed and dated by the Case Handler. It should then be given to the DSL who is responsible for securely storing all records of bullying and other serious disciplinary offences. If it is not practicable to use the incident form, the incident must still be written down, signed, and dated by the Case Handler, and held securely by the DSL;
7. The DSL will inform the Head of Boarding where alleged perpetrator(s) and victim(s) are boarding pupils. The Headmaster should be informed;
8. The victim(s) will be interviewed again at a later stage by a member of the pastoral team, separately from the alleged

- perpetrator(s). They will be offered support to develop a strategy to help. It will be made clear to them why revenge or retaliation is inappropriate;
9. The perpetrator(s) will be interviewed again at a later stage by a member of the pastoral team, separately from the victim(s), and it will be made clear why their behaviour was inappropriate and caused distress. They will be offered guidance on modifying their behaviour. The School's Behaviour Management Policy may also be invoked. Sanctions under the Behaviour Management Policy might include, for example, detention and withdrawal of privileges. The School may exclude a pupil, either temporarily or permanently, in cases of serious or persistent bullying, or in the event that the support put in place for the perpetrator(s) does not result in the modification of behaviour to an acceptable level;
 10. The parents/ guardians of all parties will be informed and may be invited into School to discuss the matter, and the appropriate sanctions. The parents' support will be sought in respect of preventative measures, and any concerns of either party will be addressed;
 11. A way forward, including where appropriate disciplinary sanctions and support for the perpetrator(s), should be determined, and where possible agreed with all parties. This should recognise that suitable support may be needed by the pupils who are being bullied, and also by the pupils who bully others, as well as dealing with disciplinary measures if appropriate;
 12. As part of this process, a meeting involving all the parties, with close staff supervision, may be convened to help develop a strategy which enables all concerned to close the episode;
 13. A monitoring and review strategy will be put in place and put on record;
 14. In very serious cases, and only after the Headmaster has been involved, it may be necessary to make a report to the Police or to Children's Services. However, in many cases it will be possible to resolve such issues internally under this policy and the School's Behaviour Management Policy.

Victims, alleged bullies and witnesses should be interviewed separately and their accounts of the incident are to be written down. In the course of this procedure, enquiries should be made to ascertain whether or not the alleged bully has been involved in similar incidents involving this or other pupils, thus enabling patterns or behaviour to be established. The relevant Group Tutor should always be informed. . Consultation with the Pastoral team, Director of Studies, Head of Boarding and Headmaster will determine which level of the school management is most appropriate to deal with the incident.

Action should then be taken with regard to each of the following:

- If possible, the pupil will be reconciled after the incident/incidents have been investigated and dealt with. Each case will be monitored to ensure repeated bullying does not take place.
- The bully (bullies) may be asked to apologise. Reflection and support for the bully will be given in accordance with the behaviour management policy.
- Informing the parent of the victim, the bully and possibly others involved.
- Formally recording the incident on the pupil(s) files and on CPOMS.
- Giving general information to all staff, through close liaison and inter- departmental communication.
- Giving relevant feedback and reminders about appropriate behaviour to pupils.

Appropriate actions may include:

Verbal warning	Detention
A loss of free time to complete a reflection	Isolation
Parents informed	Suspension
Parents asked to come into school	

If bullying persists, the parents of the perpetrator and victim are called to discuss the situation with the Headmaster. In serious cases, exclusion will be considered.

The Role of the Headmaster: The Headmaster supports the staff in minimising bullying in our School. All incidents of bullying are taken very seriously and dealt with appropriately. The Headmaster monitors bullying and reviews the school policy regularly. The Headmaster keeps records as required. The Headmaster implements the School anti-bullying strategy and ensures that staff are aware of the policy and know how to deal with bullying. The Headmaster ensures that all children know that bullying is wrong, and that it is unacceptable. The Headmaster ensures that staff receive sufficient training to deal with bullying. The Headmaster sets the school climate of mutual support and praise for success. When children feel they are important and belong to a friendly and welcoming school, bullying is less likely.

Bullying which occurs outside school premises: Staff at Appleford School have the power to discipline pupils for misbehaving outside the school premises. Sections 90 and 91 of the Education and Inspections Act 2006 direct that a school's disciplinary powers can be used to address pupils' conduct when they are not on school premises and are not under the lawful control or charge of a member of school staff, but only if it would be reasonable for the School to regulate pupils' behaviour in those circumstances. This may include bullying incidents occurring anywhere off the school premises, such as on school or public transport, outside the local shops, or in a town. Where bullying outside school is reported to school staff, it should be investigated and acted on. The Headmaster should also consider whether it is appropriate to notify the police or anti-social behaviour coordinator in their local authority of the action taken against a pupil. If the misbehaviour could be criminal or poses a serious threat to a member of the public, the police should always be informed. While school staff members have the power to discipline pupils for bullying that occurs outside school, they will only impose the disciplinary sanction and implement that sanction on the school premises or when the pupil is under the lawful control of school staff, for instance on a school trip.

Recording of Bullying Incidents: Staff at Appleford School create and maintain a written log on the Child Protection Management System (CPOMS) of all incidents of bullying, thus enabling staff to identify patterns in bullying from the written records if there are any. Incidents based on protected characteristics are distinguished in written records. This facilitates monitoring of success in meeting of other standards, for example instilling values of tolerance and respect and actively promoting the wellbeing of pupils.

Upskirting: In 2019 the Voyeurism Offences Act came into force and made the practice of upskirting illegal. Although we do not permit pupils to have mobile phones at school, and only digital cameras with express permission, we must ensure we are alert to the possibility that this could happen here. Upskirting is defined as someone taking a picture under another person's clothing without their knowledge, with the intention of viewing their genitals or buttocks, with or without underwear. The intent of upskirting is to gain sexual gratification or to cause the victim humiliation, distress or alarm. These are forms of bullying. If this is between pupils, we will follow the child-on-child abuse procedure. If staff in the school are made aware that upskirting has occurred, then this will be treated as a sexual offence and reported accordingly. It is a safeguarding concern and must be reported to the DSL immediately. There are behaviours that would be considered as sexual harassment which may be precursors to upskirting. The use of reflective surfaces or mirrors to view underwear or genitals will not be tolerated and the school will respond to these with appropriate disciplinary action and education.

SEND and Cared For Children: We are particularly aware of the need to support these children, who may be particularly vulnerable in situations where bullying takes place. In particular we will ensure that they understand what to do if they feel they are being bullied and enable them to express their concerns if their communication skills make it difficult for them to do so.

Remember we are a 'TELLING SCHOOL'. Bullying in any form will not be tolerated.

Appendix A
STAFF PROTOCOL FOR ADDRESSING ISSUES OF BULLYING

