Anti-Bullying Policy

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1 Aims

1.1 This is the Anti-Bullying Policy of Millbank Gardens Primary Academy.

1.2 The aims of this policy are:

1.2.1 to actively promote and safeguard the welfare of pupils at the Academy;

1.2.2 to maintain and drive a positive and supportive whole school culture among all pupils and staff throughout the Academy;

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

1.2.4 to create a calm, safe and supportive environment free from disruption in which pupils can thrive and flourish both in and out of the classroom and reach their full potential;

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

1.3 This policy forms part of the Academy's whole school approach to promoting child safeguarding and wellbeing, which seeks to involve everyone at the Academy to ensure that the best interests of pupils underpins and is at the heart of all decisions, systems, processes and policies.

1.4 Although this policy is necessarily detailed, it is important to the Academy that our policies and procedures are transparent, clear and easy to understand for staff, pupils and parents. The Academy welcomes feedback on how we can continue to improve our policies.

2 Scope and application

2.1 This policy applies to the whole Academy.

2.2 This policy applies at all times when the pupil is:

2.2.1 in or at the Academy (to include any period of remote provision);

2.2.2 representing the Academy or wearing school uniform;

2.2.3 travelling to or from the Academy;

2.2.4 on Academy organised trips;

2.2.5 associated with the Academy at any time;

2.2.6 in the care of the Academy, or not and the Academy becomes aware of an incident of bullying.

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

2.3.1 affect the health, safety or well-being of a member of the school community or a member of the public;

2.3.2 have repercussions for the orderly running of the Academy; or

2.3.3 bring the Academy into disrepute.

3 Regulatory framework

3.1 This policy has been prepared to meet the Academy's responsibilities under:

3.1.1 Education (Independent School Standards) Regulations 2014;

3.1.2 *National minimum standards for boarding schools* (Department for Education (**DfE**), September 2022);

3.1.3 Education and Skills Act 2008;

3.1.4 Children Act 1989;

3.1.5 Childcare Act 2006;

3.1.6 Data Protection Act 2018 and UK General Data Protection Regulation (**UK GDPR**); and

3.1.7 Human Rights Act 1998; and

3.1.8 Equality Act 2010.

3.2 This policy has regard to the following guidance and advice:

3.2.1 Keeping children safe in education (DfE, September 2026) (**KCSIE**);

3.2.2 Working together to safeguard children 2026 (DfE, May 2026) (**WTSC**);

3.2.3 Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (HM Government, May 2024);

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

3.2.5 Cyberbullying: advice for Headteachers and school staff (DfE, November 2014);

3.2.6 Sexual and sexist bullying: developing effective anti-bullying practice (Anti-bullying Alliance);

3.2.7 Sharing nudes and semi-nudes: advice for education settings working with children and young people (DSIT and UKCIS, March 2024)

3.2.8 Searching, screening and confiscation: advice for schools (DfE, updated July 202);

3.2.9 Behaviour in schools: advice for headteachers and school staff (DfE, February 2024)

3.2.10 Mobile phones in schools: guidance (DfE, June 2026);

3.2.11 Technical guidance for schools in England (Equality and Human Rights Commission, September 2025);

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

3.2.13 Relationships education, relationships and sex education (RSE) and health education guidance (DfE, July 2025).

3.3 The following Academy policies, procedures and resource materials are relevant to this policy:

3.3.1 Behaviour policy

3.3.2 Acceptable use policy for pupils

3.3.3 Online safety policy

3.3.4 Safeguarding policy

3.3.5 Complaints procedure

3.3.6 Special educational needs and disability policy

3.3.7 Equality, Diversity and Inclusion Policy

3.3.8 Policy on smoking, alcohol, and the misuse of drugs and substances

3.3.9 Relationships education, relationships and sex education policy

4 Publication and availability

4.1 This policy is published on the Academy's website.

4.2 This policy is available in hard copy on request.

4.3 A copy of the policy is available for inspection from governance@futureacademies.org during the school day.

4.4 This policy can be made available in large print or other accessible format if required.

5 Definitions

5.1 Where the following words or phrases are used in this policy:

5.1.1 References to the **Proprietor** are references to Future Academies Trust.

5.1.2 References to **Parent** or **Parents** means the natural or adoptive parents of the pupil (irrespective of whether they are or have ever been married, with whom the pupil lives, or whether they have contact with the pupil) as well as any person who is not the natural or adoptive parent of the pupil, but who has care of, or parental responsibility for, the pupil (e.g. legal guardian).

5.1.3 References to **school days** mean Monday to Friday, when the Academy is open to pupils during term time. The dates of terms are published on the Academy's website.

6 Responsibility statement and allocation of tasks

6.1 The Proprietor has overall responsibility for all matters which are the subject of this policy.

6.2 The Proprietor is aware of its duties under the Equality Act 2010 and the requirement under s 149 of the Equality Act 2010 to meet the Public Sector Equality Duty. This means in carrying out its functions, the Proprietor is required to have due regard to the need to:

6.2.1 eliminate discrimination, harassment, victimisation and other conduct that is prohibited by the Act;

6.2.2 advance equality of opportunity between people who share a protected characteristic and people who do not share it; and

6.2.3 foster good relations across all characteristics - between people who share a protected characteristic and people who do not share it.

6.3 Any action, decision or other application of this policy imposed on a pupil will be legal and proportionate. The action, decision or other application will be reasonable in all the circumstances and account will be taken of the pupil's age, any special educational needs or disability they may have, and any religious requirements affecting them.

6.4 The proprietor is aware that having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:

(a) tackle prejudice; and

(b) promote understanding.

6.5 To ensure the efficient discharge of its responsibilities under this policy, the Proprietor has allocated the following tasks:

Task	**Allocated to**	**When / frequency of review**
Keeping the policy up to date and compliant with the law and best practice	Director of Secondary	As a minimum annually, ideally termly, and as required
Monitoring the implementation of the policy, relevant risk assessments and any action taken in response and evaluating effectiveness	Director of Secondary	As a minimum annually, ideally termly, and as required
Seeking input from interested groups (such as pupils, staff, Parents) to consider improvements to the Academy's processes under the policy	Principal	As a minimum annually, ideally termly, and as required

Task	Allocated to	When / frequency of review
Formal annual review including a review of any trends relating to incidents of bullying	Proprietor	As a minimum annually, and as required
Overall responsibility for content and implementation	Proprietor	As a minimum annually

7 Bullying

7.1 Bullying 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 by the Academy because:

7.1.1 it is harmful to the person who is bullied, to those who engage in bullying behaviour, and those who support them, and can in some cases lead to lasting psychological damage and even suicide;

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

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

7.2 Bullying is behaviour by an individual or group, repeated over time, that is intended to hurt or harm another individual or group, either physically or emotionally. Bullying is often motivated by prejudice against particular groups. Bullying may be:

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

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

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

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

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

7.2.6 **General unkindness**: constant criticism, spreading rumours or writing unkind notes, mobile phone texts or emails;

7.2.7 **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;

7.2.8 **Low level disruptive behaviour:** wearing "banter" and "horseplay" over a prolonged period of time;

7.2.9 **Cyberbullying:** bullying that takes place using technology. This may include bullying through the use of mobile electronic devices, social media or gaming sites. See Appendix 1 to this policy for guidance for pupils about cyberbullying. The Academy's separate Acceptable use policy for pupils] sets out the Academy's policy and expectations on the use of technology including mobile electronic devices;

7.2.10 **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.

7.2.11 **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.

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

7.3.1 sexist, related to a person's sex or gender reassignment;

7.3.2 racist, or regarding someone's religion, belief or culture;

7.3.3 related to a person's sexual orientation (homophobic bullying);

7.3.4 related to pregnancy and maternity;

7.3.5 related to a person's home circumstances;

7.3.6 related to a person's disability, special educational needs, learning difficulty, health or appearance; or

7.3.7 related to a person's age.

7.4 **LGB and trans-based bullying**: Children who are lesbian, gay, bisexual or transgender (**LGB and trans**) 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.

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

7.6 Some individuals may see their conduct as "teasing" or "a game" or "for the good of" the other person and not deliberately intend to hurt. These forms of behaviour are equally unacceptable but may not be malicious and may be corrected quickly depending on the circumstances. 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 Academy adopts. In some circumstances it may be necessary to consider disciplinary sanctions in response to these forms of behaviour.

7.7 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 email) to another person with the intent to cause distress or anxiety.

7.8 **Safeguarding and child-on-child abuse:**

7.8.1 Bullying is closely connected with pupil wellbeing and therefore will often require a safeguarding response. Bullying demonstrates a lack of respect for others which can overlap with abusive and harassing behaviour and which, in turn, can lead to a culture of unacceptable behaviours and an unsafe environment for children. All this informs the Academy'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.

7.8.2 Child-on-child abuse can occur both inside and outside of school and may be taking place whilst not being reported. A one size fits all approach is not appropriate for all pupils, and a contextualised approach for more vulnerable pupils, victims of abuse and pupils with special educational needs and disabilities or certain medical or physical health conditions may be required. Certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours and create an unsafe environment for pupils. In worst case scenarios, dismissing sexual harassment can led to a culture that normalises abuse and pupils accepting it as normal and not coming forward to report it.

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

7.8.4 In line with the Academy's aims and culture of openness and encouragement to report, the Academy's policy and procedures with regard to child-on-child abuse are set out in the Academy's Safeguarding Policy. Concerns about a pupil's welfare because they are the victim, witness or perpetrator of bullying behaviour must be reported in accordance with the Safeguarding Policy and appropriate action taken, taking into account the local Safeguarding Partners' threshold document.

8 Anti-bullying culture and systems

8.1 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 special educational need or disability, home circumstances or because they are new in the Academy, appears to be uncertain or has no friends. They may also become a target because of an irrational decision by a bully.

8.2 Our expectation of all members of the school community is that:

8.2.1 everyone will uphold the Academy's policies on behaviour;

8.2.2 a pupil or a member of staff or volunteer who witnesses or hears of an incident of bullying will report it in accordance with the terms of this policy;

8.2.3 a complaint of bullying will always be taken seriously;

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

8.3 In the Academy and in every year group:

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

8.3.2 positive attitudes are fostered towards people with any protected characteristic including those who are disabled and towards ethnic, religious, cultural and linguistic groups within and outside the Academy;

8.3.3 positive attitudes are fostered towards gender and sexuality differences through the curriculum and tutorials; and

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

8.4 **Proprietor**

8.4.1 The Proprietor has overall responsibility for promoting and safeguarding the welfare of pupils at the Academy, 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:

(a) minimise the risk of bullying at the Academy so that pupils and staff feel safe and secure;

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

(c) deal swiftly with allegations and incidents of bullying at the Academy so that pupils and staff feel confident that all incidents will be dealt with appropriately;

(d) 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

8.5 **Staff**

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

(a) celebrating achievement;

(b) anticipating problems and providing support;

(c) 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;

(d) disciplining perpetrators fairly, consistently and reasonably, taking into account any special educational needs or disabilities of the pupil, taking into account the motivations and any underlying safety concerns of the perpetrator and providing support as appropriate;

(e) being alert to the fact that some victims, witnesses and perpetrators may themselves be vulnerable to bullying or harassment following any reports of sexual violence or sexual harassment;

(f) making opportunities to listen to pupils;

(g) acting as advocates of pupils;

(h) 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;

(i) reporting concerning behaviour in accordance with the provisions outlined in this policy, adopting a "it could happen here" approach.

8.5.2 Members of staff and volunteers are vigilant at all times but particularly:

(a) at the start and end of the school day when pupils arrive and leave the site;

(b) before lessons;

(c) in the queue for the dining hall and in the dining hall itself;

(d) in school corridors; and,

(e) on Academy transport / school trips.

8.5.3 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 strategies can be developed to prevent bullying incidents.

8.6 **Pupils**

8.6.1 Through the Academy's pastoral care systems, pupils are informed and taught that bullying will not be tolerated in the Academy. They are encouraged:

(a) to celebrate the effort and achievements of others;

(b) to hold and promote positive attitudes;

(c) to feel able to share problems with staff;

(d) to turn to someone they trust, if they have a problem;

(e) not to feel guilty about airing complaints;

(f) to be kind, considerate and tolerant towards others;

(g) to be aware of the impact their behaviour can have on others;

(h) to challenge their peers if they are unkind to others;

(i) to celebrate the diversity of others;

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

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

(a) the PSHE and relationships education curriculum includes lessons on bullying;

(b) the Academy community will challenge stereotypical opinions so negative views are not perpetuated e.g. misogyny or misandry;

(c) anti-bullying posters placed around the Academy;

(d) anti-bullying messages are given in assemblies;

(e) once a year we hold an anti-bullying week;

(f) online safety is a key aspect of all areas of the curriculum. Parents are informed about online safety issues and the Academy's strategies to safeguard pupils through correspondence and events held by the Academy to raise awareness. See the Academy's Online Safety Policy for further information about the Academy's online safety strategy;

8.6.3 The Academy recognises that children with special educational needs and disabilities and certain medical or physical health conditions can face additional safeguarding challenges, including the potential to be disproportionately impacted by behaviours such as peer group isolation, bullying, without outwardly showing any signs. The Academy will consider extra pastoral support for pupils with special educational needs and disabilities, as required.

8.7 **Parents**

8.7.1 The Academy will take active measures to promote an anti-bullying culture and make it clear to Parents that bullying amongst pupils or towards staff will not be tolerated by the Academy.

8.7.2 We will give parents access to training and support materials.

9 Reporting concerns

9.1 Pupils

9.1.1 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, form tutor, a senior leader or any member of staff or volunteer at the Academy or a responsible older pupil;

(b) use the 'worry box' if they do not feel comfortable speaking directly to them

9.2 Parents

9.2.1 Parents who are concerned that their child is being bullied should inform their child's form tutor without delay.

9.3 Staff

9.3.1 A member of staff or volunteer who learns of alleged bullying behaviour should:

(a) respond quickly and sensitively by offering advice, support and reassurance to the alleged victim;

(b) listen carefully and keep an open mind;

(c) not ask leading questions;

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

(e) report the allegation to the Assistant Headteacher as soon as possible;

9.3.2 The Assistant Headteacher must contact the relevant Form Tutor and other appropriate members of staff to agree on a strategy for dealing with the matter.

9.3.3 If the alleged bullying behaviour raises a safeguarding concern, the matter should be reported in accordance with the Academy's Safeguarding Policy before further investigation is carried out. In the case of bullying potentially involving harmful sexual behaviours, staff will follow guidance set out in Part 5 of KCSIE.

9.3.4 This policy focuses mainly on the bullying of pupils by pupils (i.e. child-on-child) although it is recognised that a staff member could be a victim of and on occasion may be perceived to be the perpetrator of bullying behaviour. The bullying of staff, whether by pupils, Parents or other colleagues, is unacceptable. Staff members who are concerned about being bullied or harassed should refer to the Academy's Staff Handbook. Pupils and Parents who feel that a member of staff is bullying should report this in accordance with the procedures set out above.

10 Why incidents might not be reported

10.1 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:

10.1.1 it is telling tales;

10.1.2 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;

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

10.1.4 it is all my fault anyway for being overweight / too studious, etc.;

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

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

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

10.1.8 I will lie low and not draw attention to myself;

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

10.2 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:

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

10.2.2 it is not my concern anyway;

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

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

10.3.1 every complaint of bullying will be taken seriously;

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

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

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

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

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

11 Assessment of concerns

11.1 The Assistant Headteacher 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:

11.1.1 the nature of the incident(s): Physical? Sexual? Verbal? Exclusionary? etc.

11.1.2 is it a "one-off" incident involving an individual or a group?[1]

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

11.1.4 has physical injury been caused?

11.1.5 who should be informed: the Principal? the Parents? the Academy's Designated Safeguarding Lead? Children's social care? The police?

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

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

[1][• The Academy will be alert to and take action in response to single incidents where necessary and make appropriate records in order to assist it to spot patterns and to ensure the single incident does not become the first of a series.]

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

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

11.2.2 the complaint is justified in whole or in part, and further action will be needed.

11.3 If at any stage the alleged bullying behaviour raises a safeguarding concern, the Academy's Safeguarding Policy 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 Academy's policy on sharing consensual or non-consensual nude and semi-nude images as set out in the Academy's Safeguarding Policy.

11.4 Otherwise, in cases where the Assistant Headteacher 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 Principal or Deputy.

11.5 The Principal or Deputy will:

11.5.1 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

11.5.2 send a summary of their findings to the Principal and other relevant staff.

11.6 Together with the Principal, the Deputy Principal will decide on the action to be taken in accordance with this policy.

11.7 The Principal or another senior leader will notify the Parents of the victim and bully giving them details of the case and the action being taken. Such action may include further investigation and action in accordance with the Academy's Behaviour Policy.

12 Response to concerns

12.1 When a complaint of bullying behaviour is upheld, the range of responses may include one or more of the following:

12.1.1 consideration as to whether the bullying incident should be addressed as a safeguarding concern and if so, the Academy's Safeguarding Policy will be followed;

12.1.2 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;

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

12.1.4 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 give rise to safeguarding concerns relating to the bullying, the Academy's Safeguarding Policy and procedures] will be followed;

12.1.5 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);

12.1.6 a disciplinary sanction against the bully, in accordance with the Academy's Behaviour Policy. In a very serious case or a case of persistent bullying, a pupil may be permanently excluded in accordance with the Academy's Behaviour 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;

12.1.7 action to break up a "power base";

12.1.8 confiscation of mobile electronic devices, increased monitoring procedures or limiting access to the Academy's internet and email facilities if cyberbullying (see also the Academy's Acceptable Use Policy for Pupils);

12.1.9 moving either the bully or victim to another form group after consultation with the pupil, their Parents and the relevant staff;

12.1.10 involving children's social care or the police;

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

12.1.12 notifying external agencies where appropriate;

12.1.13 such other action as may appear to the Principal to be appropriate.

12.2 The position should be monitored for as long as necessary thereafter. Action may include:

12.2.1 sharing information with some or all colleagues and with pupils in the Form / Year so that they may be alert to the need to monitor certain pupils closely;

12.2.2 ongoing counselling and support;

12.2.3 vigilance;

12.2.4 mentioning the incident at meetings of staff; and

12.2.5 reviewing vulnerable individuals and areas of the Academy.

13 Supporting those severely impacted by bullying

13.1 The Academy recognises that removing bullied pupils from the Academy is disruptive and can make it difficult to reintegrate. The Academy understands in some circumstances, however, the consequences of being bullied may have had a severe impact on a pupil's social, emotional or mental health and may have impacted seriously on a pupil's ability to learn.

13.2 The Academy will do all that is reasonably possible to ensure bullied pupils continue to attend the Academy and maintain their educational progression by putting in place proportionate short term alternative on-site provision plans where necessary.

13.3 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 Academy will consider whether the pupil will benefit from being assessed for special educational needs (SEN).

14 Training

14.1 Staff

14.1.1 The Academy ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff (including governors and Trustees) and volunteers understand what is expected of them by this policy and have the necessary knowledge and skills to carry out their roles especially:

(a) having an understanding of the groups who may be more vulnerable to bullying;

(b) awareness of the risk and indications of bullying, and how to deal with cases;

(c) counselling skills (including bereavement);

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

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

14.1.3 The Academy maintains written records of all staff training.

14.2 Pupils

14.2.1 We emphasise with older pupils the role which is expected of them in setting a good example and being helpful to younger pupils and each other. We have peer mentors.

15 Risk assessment

15.1 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.

15.2 The format of any such risk assessment may be a stand-alone document or recorded on the Academy's electronic safeguarding management system. It may vary and may be included as part of the Academy'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 Academy's approach to promoting pupil welfare will be systematic and pupil focused.

15.3 The Principal 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.

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

16 Record keeping

16.1 All records created in accordance with this policy are managed in accordance with the Academy's policies that apply to the retention and destruction of records.

16.2 The Academy will establish and maintain a strong and effective system for data recording including all parts of behaviour culture that is collected from a range of sources and that is regularly objectively analysed and monitored by appropriate skilled staff.

16.3 The Academy's staff maintain records of the welfare and development of individual pupils. Every complaint or report of bullying is recorded centrally and monitored to enable patterns to be identified, both in relation to individual pupils and across the Academy as a whole and to evaluate the effectiveness of the Academy's approach.

16.4 The Assistant Principal will maintain a centralised record of all allegations or reports of bullying, including details of those involved and the action taken.

16.5 The Assistant Principal will monitor the centralised record of bullying incidents on a regular basis to identify patterns in behaviour and the effectiveness of the Academy's anti-bullying procedures.

16.6 This record will be reviewed by the Proprietor in order to evaluate all data recorded in order to meet its obligations under this policy and, in particular, establish any trends (for example, in respect of particular socio-economical groups, or groups with a protected characteristic).

16.7 The records created in accordance with this policy may contain personal data. The Academy has a number of privacy notices which explain how the Academy will use personal data. The Academy's approach to data protection compliance is set out in the overarching data protection policy. In addition, staff must ensure that they follow the Academy's data protection policies and procedures when handling personal data created in connection with this policy; this includes the Academy's Data protection policy: practical guidance for staff and the information security policy.

Appendix 1 Cyberbullying: Guidance for Pupils

1 The Department for Education's guidance Preventing and tackling bullying (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:

(a) harmful messages (text, instant, multimedia, email);

(b) impersonating another person online;

(c) sharing private messages;

(d) uploading photographs or videos of another person that leads to shame and embarrassment;

(e) creating hate websites / social media pages;

(f) excluding people from online groups.

3 Pupils should remember the following:

3.1 use the security settings when using technology;

3.2 regularly change your password and keep it private;

3.3 always respect others - be careful what you say online and what images you send;

3.4 think before you send - whatever you send can be made public very quickly and could stay online forever;

3.5 if you or someone you know are being cyberbullied, tell someone. You have the right not to be harassed or bullied online. Tell an adult you trust - your Parents, any member of staff or volunteer or a helpline such as the NSPCC Helpline (0808 800 5000) or ChildLine on 0800 1111;

3.6 don't retaliate or reply online;

3.7 save the evidence - learn how to keep records of offending messages, pictures or online conversations. Ask someone if you are unsure how to do this. This will help to show what is happening and can be used by the Academy to investigate the matter;

3.8 block the bully. Most social media websites and online or mobile services allow you block someone who is behaving badly;

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:

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

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

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

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

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

4.6 https://www.bbc.com/ownit

5 Please see the Academy's Acceptable Use Policy for Pupils which sets out the Academy's policy on the use of technology including mobile electronic devices. Internet safety measures (including the use of filters and monitoring of usage and mobile technology) are set out in the Academy's Online Safety Policy and / or Acceptable Use Policy.

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

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