

POLICY

Education – Anti Bullying

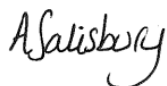
Policy Author	Laura Dickie, Head of Policy Tonia Lewis, Education and Quality Improvement Lead
Approval Date	Feb 2026
Policy Approver	Jo Dunn, Compliance, Regulation and Quality Director
Next Review Date	Feb 2029
Version No.	001
Policy Level	Education
Staff groups affected	All Education

Monitoring and Review

This policy will be monitored on an ongoing basis through the service's established governance and quality assurance systems. Responsibility for ensuring that the policy remains compliant with legislation and regulatory frameworks sits with the Proprietor Representative and Regional Lead.

A formal review of this policy will be undertaken no later than three years from the date of approval, or sooner if changes in legislation, regulatory guidance, or operational requirements necessitate it.

The Head of Policy will support this process by identifying relevant changes in legislation, regulation, national standards and emerging best practice. The Head of Policy will also incorporate learning from inspections, audits and practice developments into future revisions whilst overseeing all proposed amendments to the universal content to ensure accuracy, consistency and compliance.



Abigail Salisbury-Headteacher

Terminology

Our aim is to use consistent terminology throughout this policy and all supporting documentation as follows:

Term	Definition
‘Establishment’ or ‘Site’	A generic term referring to the school/college owned by CareTech.
Learner	Any child or young person under the age of 18, or young adult over 18 who receives education.
Service Head	The senior person with overall responsibility for the school/college.
Tutor/Teacher	Members of staff who have teaching responsibility for learners at the school/college.
Parent/Carer	Parent or person with parental responsibility.
Regulatory Authority	The independent regulatory body responsible for inspecting and regulating services (e.g., Ofsted, Estyn, Education Scotland).
Social Worker	The worker allocated to the individual learner; if none is allocated, the Duty Social Worker or Team Manager is responsible.
Placing Authority	The local authority/agency responsible for placing the learner or commissioning the service.
Local Authority	The local authority for the establishment’s location.
Staff	All staff working at the location, including employed staff, students on placement, contractors, agency staff, volunteers and proprietors.

1. Local Site Profile

Devon School is an independent specialist provision for students aged 7 to 18 with Social, Emotional and Mental Health (SEMH) needs. We provide a nurturing and supportive environment where students can access learning that is tailored to their individual needs. Our approach focuses not only on academic progress, but also on helping every student develop confidence, self-esteem, resilience and positive relationships. At Devon School, we believe that every young person deserves the opportunity to succeed and to discover their strengths in a safe and compassionate learning community.

At Devon School, our vision is to collaborate with students and families to create a respectful and compassionate school community. We aim to foster a lifelong love of learning, empowering everyone to become the best versions of themselves.

Our school community is guided by five core values that shape everything we do:

- Respect
- Honesty
- Responsibility
- Resilience
- Kindness

These values help us create a positive environment where students feel safe, valued and supported to grow.

2. Purpose

Every Learner has the right to learn and work in a safe, respectful environment. This policy sets out our universal approach to preventing, identifying and responding to bullying, including online harm. It applies across all sites, to all Learners (under and over 18), all members of the staff team/education team, Teachers/tutors, volunteers, contractors and visitors.

This policy provides a consistent framework that each site implements through the marked **[Adapt Locally]** sections.

3. Scope

- Applies to all learning, social and residential contexts linked to the site (on-site, off-site visits, transport arranged by the site, work placements, online spaces and messaging connected to learning).
- Covers bullying between Learners, and between Learners and adults connected to the site.

- Interfaces with safeguarding, behaviour, online safety, equality/inclusion, complaints and data protection arrangements.

4. Local Adaptation Requirement (Adapt Locally)

Some sections in this policy are marked **Adapt Locally**. These sections are completed by each site to reflect local operational procedures or national equivalents (e.g., safeguarding framework, inspection remit, curriculum/quality framework, data protection contacts).^{**}

All local additions must be:

- Accurate
- Up to date
- Consistent with national legislation and regulator guidance
- Fully aligned with the universal standards in this policy
- Where no local adaptation or local equivalent is required, the universal content remains fully applicable.

5. Legal and Regulatory Context

Devon School is governed by the statutory duties, safeguarding requirements and inspection arrangements of the nation in which it operates. The universal standards in this policy are implemented in line with the correct national frameworks set out in **Appendices A–C**, which summarise the legal, regulatory and inspection requirements for England, Wales and Scotland.

6. Principles (Our Commitments)

- **Relational & trauma-responsive:** We prioritise safety, dignity and connection. Responses aim to stabilise, understand and repair harm, not to escalate distress.
- **Inclusive & equitable:** We recognise that some Learners are more at risk of bullying and require proactive support and reasonable adjustments.
- **Learner voice:** We make it easy, safe and routine to report concerns—privately or with a trusted adult.
- **Preventive culture:** We teach and model respect, digital citizenship, and bystander confidence in every phase/programme.
- **Clear, timely response:** Concerns are taken seriously and addressed promptly, fairly and proportionately.
- **Evidence-informed:** We record, analyse and act on data to reduce recurrence and improve practice.

7. What We Mean by Bullying

Bullying is repeated, intentional or pattern-forming behaviour that aims to cause physical, emotional or social harm, or to exercise power over another person or group. It may be:

- **Verbal/face-to-face:** name-calling, threats, humiliation, coercion, excluding or isolating.
- **Physical:** assault, unwanted contact, damage to property or belongings.
- **Social/relational:** rumours, intimidation, “silent treatment,” pressuring others to act harmfully.
- **Online/cyber:** posts, images, doxxing, impersonation, harassment, non-consensual sharing of content, group-chat pile-ons.
- **Prejudice-based:** involving hostility or derogatory language/actions linked to protected or personal characteristics (e.g., race/ethnicity, religion/belief, disability/SEN, sex, sexual orientation, gender identity, care-experienced status, socioeconomic background, appearance). Bullying is different from ordinary conflict: it involves a power imbalance (perceived or actual).

8. Roles and Responsibilities

Headteacher

- Sets culture, ensures resourcing, approves local procedures, and assures impact through governance reporting.

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Teachers/tutors & staff team

- Teach and model respectful relationships and digital conduct.
- Notice early indicators; respond proportionately; record and escalate concerns.
- Implement agreed supports and reasonable adjustments.

Education leaders/curriculum/programme leads

- Embed anti-bullying education across the curriculum and FE programmes; coordinate workload-aware responses and restoration.

Designated safeguarding lead(s)

- Advise on threshold, coordinate with the multi-agency team, maintain oversight of risk and safety plans.

Learners

- Treat others with respect; report concerns for self or others; participate in restorative processes where safe and appropriate.

Parents/carers and partners

- Work with the site to resolve concerns and sustain positive relationships.

Headteacher/DDSL-Abbi Salisbury Abbi.Salisbury@cambiangroup.com

Designated Safeguarding Lead/Assistant Headteacher-Claire Benjafield

Claire.Benjafield@cambiangroup.com

Assistant Headteacher/DDSL-Scott Salisbury Scott.Salisbury@cambiangroup.com

9. Prevention (Culture, Curriculum and Skills)

We build a culture where bullying is unlikely to thrive by:

- **Teaching:** proactive curriculum on respect, consent, digital literacy, bystander action, and prejudice-based bullying (age/phase appropriate, including FE contexts).
- **Environment:** safe supervision zones, visibility on transport and in residences, clear online expectations.
- **Learner participation:** councils/ambassadors, co-designed campaigns, peer mentors.
- **Staff competence:** regular training on trauma-responsive practice, online trends, and prejudice-based harm.

Primary Programme (Key Stages 1–2):

- Taught through PSHE lessons and key worker sessions focusing on respect, friendships, emotions, and early understanding of bullying, including simple digital safety.
- Reinforced through whole-school assemblies and themed weeks (e.g. Anti Bullying Week).

Secondary Programme (Key Stage 3-4):

- Delivered through PSHE and SMSC curriculum, including explicit teaching on consent, diversity, prejudice-based bullying, online behaviour, and bystander responsibility.
- Supported by regular key worker sessions
- Assemblies follow a structured calendar aligned to safeguarding themes and national awareness events.

SEMH Therapeutic Programme (All Phases):

- Anti-bullying themes are reinforced through individual and group therapeutic work, including emotional regulation, empathy development, and conflict resolution.
- Restorative approaches are used to address incidents and build understanding.

Reporting and Help-Seeking

We make multiple low-barrier routes available: in-person, discreet written alerts, online forms, anonymous options, and trusted-adult reporting. No concern is too small.

- **Report a concern:** Abbi.Salisbury@cambiangroup.com
- **Trusted adult routes:** Claire Benjafield-Designated Safeguarding Lead

10. Responding to Concerns (Trauma-Responsive Process)

Step 1 — Stabilise & listen: Ensure immediate safety; listen without judgment; avoid compelling disclosure; signpost next steps; consider communication needs and reasonable adjustments.

Step 2 — Record & triage (same day): Log accurately; check for indicators of prejudice-based harm, online harm, exploitation, or group dynamics; review history for patterns.

Step 3 — Plan: Agree proportionate actions—support for the targeted Learner(s), fair

process for those alleged to have caused harm, contact parents/carers where appropriate (age/consent-aware), and decide if safeguarding threshold is met.

Step 4 — Act & support: Implement supports (Section 10); consider restorative approaches where safe/appropriate; apply sanctions only where proportionate and educative; address online footprint (takedown/reporting).

Step 5 — Review: Re-check with Learners; adjust support; record outcomes; analyse for learning.

Response timeframes:

- Initial acknowledgement and contact made within 1 working day of a concern being reported.
- Triage and initial actions completed on the same day wherever possible.
- A formal review of actions and impact undertaken within 5 working days, with further reviews scheduled as required based on need and risk.

Appeal/complaint route:

- Any concerns about how a case has been managed may be raised via the school's complaints process which can be accessed on our website.

Recording:

- All concerns are recorded on the school's behaviour watch system
- Records are factual, timely, and reviewed by safeguarding leads and SLT to ensure quality, consistency, and appropriate follow-up.

11. Support for Learners (Under and Over 18)

- **Targeted by bullying:** named adult; safe spaces; timetable/placement adjustments; catch-up and assessment flexibility; therapeutic input; digital hygiene coaching; travel/residential safety plan.
- **Those who caused harm:** structured reflection; reparative tasks; coaching on empathy/digital conduct; proportionate consequences; monitored re-integration.
- **Groups/classes:** restorative circles or facilitated discussions, if safe and consented.
- **Online harm:** guidance on evidence capture; platform reporting; privacy/security resets.

Pastoral Support:

- Internal therapeutic support is led by the Pastoral Lead (Charlotte Ford) and Senior Mental Health Lead (Daniel Wilson), who deliver targeted interventions including Emotional Literacy and Thrive.
- Referrals are made via the DSL/Deputy DSL or SENCO, following review of need at pastoral/safeguarding meetings.
- Pupils may also be supported through small group interventions, regulation programmes, or 1:1 therapeutic work based on EHCP outcomes.
- Where additional needs are identified, referrals can be made to external services (e.g. CAMHS, educational psychology, specialist SEMH services) in line with local authority pathways

Multi-agency pathways:

- Referrals to external services are coordinated by the DSL, SENCO, and senior leaders, ensuring a joined-up approach to safeguarding and support.
- The school works with local authority Early Help teams, social care, CAMHS, and other specialist services where thresholds are met.
- Early Help or targeted support referrals are initiated through the appropriate local authority referral route, with consent sought where required.
- Strategy discussions and multi-agency meetings are attended by the DSL or delegated senior leader.

12. Online/Cyber Bullying

Expectations apply in all learning-related digital spaces. The site uses approved platforms; staff do not use personal accounts with Learners. Learners are taught how to report, block, preserve evidence and seek help quickly.

Platform list & controls:

- The school uses approved educational platforms and systems to support teaching and communication.
- All internet access is subject to filtering and monitoring systems in line with the school's safeguarding requirements.
- Staff oversee online activity within lessons and structured sessions, with clear reporting and moderation procedures in place for any concerns.

How to report platform abuse:

- Learners are encouraged to report concerns verbally to a member of the Senior Leadership Team (SLT), DSL, or trusted adult.
- Concerns can also be logged by staff using the school's Behaviour Watch safeguarding system to ensure timely recording and follow-up.
- Learners are supported to understand how to block users, preserve evidence (screenshot) and seek support.

13. Prejudice-Based and Targeted Bullying

We take a zero-ambivalence stance on prejudice-based bullying (e.g., disability/SEND, race/ethnicity, religion/belief, sex, sexual orientation, gender identity, care-experienced status, socioeconomic background, appearance). Responses consider identity-based impact, power dynamics and wider group effects. Leaders monitor patterns and reduce disparities.

Equalities objectives & data cycle:

- The school sets Equality, Diversity and Inclusion (EDI) objectives annually, informed by analysis of behaviour, safeguarding, attendance and admissions data, including patterns of prejudice-based incidents.
- Progress against objectives is reviewed termly through governance, providing oversight, challenge, and assurance that actions are addressing any identified disparities.

- Senior leaders use this review cycle to adapt provision, curriculum content, and targeted interventions where needed.

Reporting hate incidents:

- **All** prejudice-based incidents are recorded on Behaviour Watch by staff, categorised appropriately (e.g. race, SEND/disability, sexuality, gender identity, religion).
- Incidents are reviewed by the DSL and senior leaders to ensure appropriate safeguarding responses and support.
- Where thresholds are met, incidents are escalated to the local authority in line with reporting requirements.
- Patterns and trends are monitored to inform preventative work and whole school responses

14. Reasonable Adjustments and Accessibility

We adapt processes, communications and learning tasks to remove barriers for Learners (including disabilities, neurodivergence, SEMH needs, EAL). Flexible reporting options, accessible formats and adjusted timelines are available.

Access Planning:

- Reasonable adjustments are identified, recorded, and reviewed through each pupil's Education, Health and Care Plan (EHCP), Behaviour Support Plans and Individual Risk Assessments
- Adjustments are discussed and agreed during admissions, induction, and review meetings, and are updated regularly through reviews led by the SENCO and SLT.
- All staff have access to relevant pupil information to ensure consistent implementation of adjustments across lessons and activities.
- For further information please access our SEND Policy

Assistive technology & formats:

- The school uses a range of assistive approaches and technologies to support access, including adapted resources, visual supports, structured timetables, and scaffolded learning materials.
- Where appropriate, learners are supported with digital tools (e.g. laptops, speech-to-text, reading aids) and differentiated formats to meet communication and learning needs.
Teaching materials can be provided in accessible formats (e.g. simplified text, visual formats, or alternative recording methods) to reduce barriers to engagement.

15. Recording, Data and Privacy

- Record concerns/actions/outcomes on the site system; flag repeat patterns.
- Collect the minimum necessary personal data; store securely; follow retention rules.
- Use aggregated data to drive prevention and improvement.

Case system:

- All concerns, actions, and outcomes are recorded on Behaviour Watch
- Access is restricted to DSLs, Deputy DSLs, Senior Leadership Team (SLT), and other authorised staff on a need-to-know basis, ensuring confidentiality and appropriate safeguarding oversight.

Retention reference: Records are managed in line with the school's data protection requirements and retention schedule

Analytics cadence:

- Incident and safeguarding data, including bullying and prejudice-based incidents, are reviewed regularly by the Senior Leadership Team (SLT).
- Key patterns, trends, and actions are reported through governance review processes, supporting strategic oversight and continuous improvement.

16. Safeguarding

Bullying can be a symptom or driver of wider risk (on-site, online, at home, in the community, in residences/work placements). We treat bullying concerns as safeguarding-relevant by default and apply a trauma-responsive approach:

16.1 Early identification & threshold thinking

- Consider indicators of **significant harm** or **risk of harm** (e.g., coercion, sexual harassment/violence, criminal or sexual exploitation, self-harm, hate incidents, persistent online abuse, group pressure, threats to safety).
- For **over-18 Learners**, consider adult-safeguarding concerns, capacity, and consent; balance autonomy with duty to protect.
- Where threshold is met, **escalate immediately** via the site safeguarding procedure.

16.2 Immediate safety & stabilisation

- Safety planning for targeted Learners (environmental tweaks, supervision, timetable changes, contact restrictions, travel/residential adjustments).
- Limit contact between parties while enquiries proceed; avoid actions that escalate distress; prioritise dignity and choice.

16.3 Information sharing & consent

- Share information **lawfully, proportionately and on a need-to-know basis** with the multi-agency team when risk is identified; record rationale.
- For adults, assess capacity and obtain consent where appropriate; override only where justified by risk/serious harm tests.
- Keep Learners informed about what will be shared and why; offer advocacy or a trusted adult.

16.4 Online/contextual safeguarding

- Consider **contexts** (class, residence, transport, local community, online platforms).

- Take steps to reduce ongoing harm (report to platforms; secure evidence; educate peer group; amend access/visibility settings).

16.5 Multi-agency coordination

- Consult/escalate to local safeguarding partners as needed; follow agreed local thresholds and referral pathways.
- Align anti-bullying actions with any child/adult protection plan or early-help plan; avoid duplicated or conflicting actions.

16.6 Documentation & review

- Record decisions, actions, and outcomes; set review points; monitor for recurrence or escalation; capture Learner voice in reviews.

17. Training and Competence

All staff receive induction and regular refreshers on: recognising bullying (incl. online and prejudice-based), trauma-responsive conversations, safe documentation, restorative practice, and the safeguarding interface.

Training matrix & cadence:

- All staff receive safeguarding and anti-bullying training regularly, including recognising bullying (online and prejudice-based), trauma-responsive approaches, recording expectations, and restorative practice.
- Annual safeguarding refresher training is mandatory for all staff.
- Targeted training (e.g. SEMH strategies, online safety, prejudice-based incidents, and behaviour support) is delivered termly through the CPD programme, led by the DSL, Behaviour and Pastoral Lead, and senior leaders.
- Key staff (such as: DSLs, deputies, SLT) receive enhanced and updated training regularly, with regular updates in line with local and national guidance.

Completion records:

- Staff training records are kept on My Hippo or in the school training matrix.
- Any gaps in training are identified and addressed by SLT.

18. Quality Assurance and Governance

Leaders monitor: reporting volumes, response times, repeat incidents, prejudice-based patterns, Learner/parent feedback, staff training completion, and impact of prevention/education. Findings feed improvement planning and governance reporting.

QA calendar:

- Admissions, behaviour, safeguarding, and bullying data are reviewed through regular SLT monitoring cycles, including standing agenda items in leadership meetings.
- A termly QA cycle is used to review trends (e.g. incident volumes, response times, repeat concerns, and prejudice-based patterns), alongside the impact of

interventions and curriculum delivery.

- Data is triangulated with learner voice, parent/carers feedback, and staff training compliance to inform continuous improvement.

Governance reports:

- Key findings and trends are reported termly to the Director of Education (Day Schools) as part of the school's governance and oversight arrangements.
- Reports include analysis of safeguarding, behaviour, bullying (including prejudice-based incidents), and the effectiveness of preventative strategies.
- This ensures appropriate challenge, support, and strategic direction at proprietor level.

19. Communication and Publishing Duties

- Publish this policy on the **site website** in an accessible format; provide alternative formats/languages on request.
- Provide a **plain-language summary** to Learners and parents/carers at induction and re-share annually.
- Display reporting routes around the site and on Learner platforms.

20. Linked Policies and Procedures

- **Safeguarding / Child & Adult Protection** (*core*)
- **Online Safety / Acceptable Use / Filtering & Monitoring**
- **Positive Behaviour Support**
- **Equality, Diversity & Inclusion** (incl. objectives)
- **Inclusion**
- **SEND / ASN / ALN**
- **Data Protection**
- **Records Management**
- **Complaints & Whistleblowing**

Appendix A — England

Legislation, guidance and regulatory frameworks underpinning anti-bullying in England

Preventing and Tackling Bullying (DfE) Guidance updated 2017

- **Means:** National guidance for leaders and staff on preventing and responding to bullying (including online); applies to schools and is useful for FE settings.
- **Requires:** A whole-site approach, clear reporting routes, proportionate responses, and targeted support for vulnerable Learners.
- **Our stance:** We embed prevention, early help and equitable access to help-seeking across all programmes and ages.
- **Implementation example:** Site behaviour/relationships policy references this guidance; incident logs show actions, outcomes and learner voice.
- **Links:** <https://www.gov.uk/government/publications/preventing-and-tackling-bullying>
- **Behaviour in Schools (DfE) updated 2024**
- **Means:** Non-statutory guidance that sets behaviour policy expectations, including responses to peer-on-peer abuse and incidents online.
- **Requires:** A published behaviour policy, consistent practice, and proportionate sanctions alongside support to prevent recurrence.
- **Our stance:** Anti-bullying practice is part of the behaviour curriculum and daily routines, not a standalone activity.
- **Implementation example:** Walkthroughs and work scrutiny show how routines, language, and restorative approaches reduce recurrence.
- **Links:** <https://www.gov.uk/government/publications/behaviour-in-schools--2>

Keeping Children Safe in Education (KCSIE) 2025

- **Means:** Statutory guidance for schools and colleges how cater for under 18s on safeguarding; covers child-on-child abuse, sexual harassment/violence and online harm.
- **Requires:** Clear reporting/escalation, DSL oversight, staff training, safe recording, and coordinated support when bullying indicates wider risk.
- **Our stance:** All bullying concerns are triaged through safeguarding; thresholds and multi agency team engagement are applied consistently.
- **Implementation example:** Case files show same-day logging, threshold decisions, parent/carer updates and review points.
- **Links:** <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Equality Act 2010

- **Means:** UK-wide law prohibiting discrimination, harassment and victimisation; relevant to prejudice-based bullying and reasonable adjustments.
- **Requires:** Eliminate unlawful conduct, advance equality of opportunity, foster good relations; evidence of accessible anti-bullying processes.
- **Our stance:** We design reporting, responses and curriculum messages to prevent prejudice-based bullying across all characteristics.

- **Implementation example:** Termly review of prejudice-based incident data with actions and communication to Learners and staff.
- **Links:** <https://www.legislation.gov.uk/ukpga/2010/15/contents>

Education (Independent School Standards) Regulations 2014 (ISS)

- **Means:** Standards independent schools must meet (e.g., welfare, health and safety; leadership; complaints); anti-bullying sits within welfare & leadership.
- **Requires:** Safe culture, effective behaviour and anti-bullying arrangements, compliant information/complaints and leadership oversight.
- **Our stance:** Proprietor and Headteacher/Principal review anti-bullying data and compliance at least termly.
- **Implementation example:** Governance minutes and compliance checks link incidents, actions and ISS Parts 3/8 assurance.
- **Links:** <https://www.legislation.gov.uk/ukxi/2014/3283>

Ofsted: Education Inspection Framework (schools)

- **Means:** National inspection framework; inspectors consider behaviour, attitudes, personal development and safeguarding culture (bullying included).
- **Requires:** Evidence that Learners feel safe, bullying is rare/handled well, and staff act quickly and proportionately.
- **Our stance:** We maintain an inspection file with live evidence of prevention, response times, outcomes and learner voice.
- **Implementation example:** EIF evidence map: policies, logs, staff training records, learner surveys, and trend analysis.
- **Links:** <https://www.gov.uk/government/collections/ofsted-handbooks-and-frameworks>

Ofsted: Further Education & Skills inspection

- **Means:** Toolkit and operating guides for inspecting FE & skills providers under the EIF; includes whole-provider safeguarding and inclusion.
- **Requires:** Providers show safe culture, effective reporting, and proportionate responses to bullying across adult and 16–19 cohorts.
- **Our stance:** Anti-bullying is embedded in induction, tutorials and programme leadership across FE provision.
- **Implementation example:** FE inspection pack: tutorial plans, incident analysis by programme, reasonable-adjustment records, and learner feedback.
- **Links:** <https://www.gov.uk/government/publications/further-education-and-skills-inspection-toolkit-operating-guide-and-information>

Appendix B — Wales

Legislation, guidance and regulatory frameworks underpinning anti-bullying in Wales

Rights, Respect, Equality 2019



- **Means:** Statutory guidance for schools on preventing, recording and responding to bullying, including prejudice-based and online.
- **Requires:** A whole-site strategy, accessible reporting, consistent responses, recording/monitoring and engagement with Learners and parents/carers.
- **Our stance:** We use the guidance to shape the behaviour/relationships policy and incident workflow.
- **Implementation example:** Annual policy review evidences use of RRE definitions, data trends and improvement actions.
- **Links:** <https://www.gov.wales/rights-respect-equality-guidance-schools>

Keeping Learners Safe 2022

- **Means:** National safeguarding guidance for schools and colleges; bullying escalates where risk indicates harm.
- **Requires:** Clear reporting/escalation, DSP arrangements, information-sharing, and multi-agency coordination for concerns arising from bullying.
- **Our stance:** All bullying concerns are screened against safeguarding thresholds for under-18s and coordinated through the site safeguarding team.
- **Implementation example:** Case records show same-day logging, threshold decisions, referrals where needed, and review of safety plans.
- **Links:** <https://www.gov.wales/keeping-learners-safe>

Independent School Standards (Wales) Regulations 2024

- **Means:** Standards that independent schools must meet (quality of education, welfare/health/safety, leadership, premises, information, complaints).
- **Requires:** Active promotion of safeguarding, clear behaviour/anti-bullying arrangements, proprietor accountability and transparent complaints handling.
- **Our stance:** Proprietor and Headteacher monitor anti-bullying compliance and publish required information.
- **Implementation example:** Compliance file maps policies, training, incident data and complaints outcomes to the relevant standards.
- **Links:** <https://www.legislation.gov.uk/wsi/2024/27/made>

Estyn: Inspection (schools and post-16)

- **Means:** Estyn's published approach and resources explain what/how inspection considers wellbeing, care, support, guidance and safeguarding (bullying in scope).
- **Requires:** Evidence of safe culture, effective reporting, consistent practice and improvement planning; applies across schools and post-16.
- **Our stance:** We keep an inspection pack aligned to Estyn's "what/how we inspect" resources (independent schools and independent specialist colleges).

- **Implementation example:** Inspection folder with policy links, incident analytics, learner voice, and QA cycles available via the VIR on request.
- **Links:** <https://estyn.gov.wales/inspection-guidance-resources/>

Appendix C — Scotland

Legislation, guidance and regulatory frameworks underpinning anti-bullying in Scotland

Respect for All: The National Approach to Anti-Bullying (2024)

- **Means:** National framework defining bullying (including online), prevention, response, recording and monitoring for schools across Scotland.
- **Requires:** Whole-school approach, accessible reporting, responsive supports and data-informed improvement on prejudice-based bullying.
- **Our stance:** We use *Respect for All* to shape definitions, processes and staff development.
- **Implementation example:** Termly anti-bullying data review with actions and communication to Learners and the education team.
- **Links:** <https://www.gov.scot/publications/respect-national-approach-anti-bullying-scotlands-children-young-people/>

National Guidance for Child Protection in Scotland (2021, updated 2023)

- **Means:** Multi-agency guidance on roles, thresholds and processes when risk of significant harm is identified (bullying may be an indicator).
- **Requires:** Prompt escalation, lawful information-sharing and multi-agency planning where bullying concerns reach child-protection threshold.
- **Our stance:** Safeguarding and anti-bullying workflows are integrated; threshold decisions are recorded with rationale.
- **Implementation example:** Child protection records show decisions, referrals and reviews linked to bullying-related risk.
- **Links:** <https://www.celcis.org/application/files/2216/9358/2979/national-guidance-child-protection-scotland-2021-updated-2023.pdf>

Getting it right for every child (GIRFEC)

- **Means:** National approach for wellbeing, early help and multi-agency working; informs prevention and support when bullying affects wellbeing.
- **Requires:** Named point of contact, coordinated planning and proportionate support to improve outcomes and prevent recurrence.
- **Our stance:** Anti-bullying actions are built into wellbeing planning (National Practice Model) and reviewed with Learners.
- **Implementation example:** Child's Plan/Wellbeing notes show supports, reasonable adjustments and review checkpoints.
- **Links:** <https://www.gov.scot/policies/girfec/>

How Good Is Our School? (HGIOS4) — HMIE/Education Scotland



- **Means:** National self-evaluation framework; QI 3.1 (wellbeing, equality and inclusion) and leadership/learning QIs underpin inspection of anti-bullying culture.
- **Requires:** Evidence that Learners feel safe, bullying is prevented/handled well, and data and stakeholder feedback drive improvement.
- **Our stance:** We use HGIOS4 to self-evaluate anti-bullying practice and set measurable improvement targets.
- **Implementation example:** Self-evaluation summary with ratings, evidence sources and next-step actions shared with governance.
- **Links:** <https://educationinspectorate.gov.scot/inspection-frameworks/hgios4/>

Equality Impact Statement

This policy has been developed to promote equality, safeguard individual's rights, and ensure fair and inclusive practice across all services. The potential impact of the policy on children, young people, young adults, families, and staff with protected characteristics has been considered in line with the Equality Act 2010.

No negative impacts have been identified. Staff must apply this policy with sensitivity to individual need and make reasonable adjustments to ensure equitable access, safety, wellbeing, and participation for every individual. Any emerging risks of differential impact should be reported and addressed through ongoing review and quality assurance.