

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.

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

Cambian Whinfell School offers up to 52-weeks residential placements and day places for local students.

The School offers **OUTSTANDING** care and education for boys and young men aged 7-19. Students often arrive after difficult education and domestic experiences and are potentially lacking of confidence. Whinfell School provides stability, consistency and a sense of belonging within a safe and nurturing environment, whilst supporting students academic, social and emotional development to prepare them for the future.

Our young people have often experienced significant disruption to their schooling in the past and may come to us from multiple placement breakdowns. They may also present a risk to themselves or others due to high levels of challenging behaviour or deficits in personal development. Typically they are very disengaged, isolated and have little self-belief. By prioritising these deficits we create the conditions for young people to re-engage in education and achieve their full potential.

We believe that it is not enough to just provide a safe and happy school experience. We prioritise **connections before corrections**, recognising that strong, trusting relationships form the foundation for genuine growth and learning. In a supportive way, we want to challenge all of our young people to grow as individuals and acquire the skills, confidence, knowledge and qualifications to be as successful and resilient as they possibly can be when they eventually move on to further education or independence

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

Whinfell 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/ASN/ALN/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/Principal

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

Teachers/tutors & staff team (including residential/support teams)

- 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) / Local safeguarding team

- 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.

Paddy Sandham (Principal) Paddy.sandham@cambiangroup.com

Jennifer Carradus (Registered Manager and DSL)
Jennifer.carradus@cambiangroup.com

Michelle Turner (Head of Education) Michelle.turner@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.

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:** Email Paddy.Sandham@cambiangroup.com
- **Trusted adult routes:** Key Workers, Key Teachers
- **Out-of-hours & residential:** Jennifer.Carradus@cambiangroup.com
01539723322

Related policies: (Link: *Safeguarding/Child & Adult Protection Policy; Online Safety/Acceptable Use; Complaints/Whistleblowing*)

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 contact within 10 working days; review within 30 days.

- **Appeal/complaint route:** See complains policy
- **Recording:** (*Recording/Case Management Guidance; Data Protection/Retention Schedule*)

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.
- **Access**

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:** approved tools, reporting & moderation. (*Online Safety/Acceptable Use Policy; Filtering & Monitoring Statement*)
- **How to report platform abuse:** (*Online Safety – Report & Remove Guidance*)

13. Prejudice-Based and Targeted Bullying

We take a zero-ambivalence stance on prejudice-based bullying (e.g., disability/ASN/ALN/ASL, 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:**. (*See Equality, Diversity & Inclusion Policy/Objectives*)
- **Reporting hate incidents:** (*Prejudice-Based Incident Reporting Guidance*)

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.

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.

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.
- **Safeguarding contacts:** DSL/DSP, deputies, out-of-hours. (See: *Safeguarding & Child Policy*; See *Local Escalation Flowchart/Prevent Policy* [Westmorland and Furness Safeguarding Hub Single Contact Form](#))
- **Referral thresholds & forms:**
- **Online risk:** (See: *Online Safety/Filtering & Monitoring Statement*)

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.

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.

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
[Whinfell School | Autism Schools | Cambian Education](#)

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
- Curriculum/Tutorial Frameworks (where anti-bullying education lives)
- Work-based Learning / Placement Agreements (where relevant)
- Young Persons Handbook (if Learner living in a residential home)
- Residential home Anti-Bullying and Safeguarding / Child Protection Policy (if Learner living in a residential home)

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/carers 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.