



New Direction School



Anti-Bullying Policy

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1. Statement of intent

New Direction School believes that all pupils are entitled to learn and develop in a safe, calm, inclusive and supportive environment. Pupils should be free from bullying, discrimination, harassment, intimidation and abuse in all forms, including online.

This policy sets out how the school prevents, identifies, records, investigates and responds to bullying. It should be read alongside the Behaviour Policy, Child Protection and Safeguarding Policy, Child-on-child Abuse Policy, Online Safety Policy, RSHE/PSHE Policy, SEND Policy, Equal Opportunities Policy, Complaints Policy, GDPR/Data Protection Policy and Suspension and Exclusion Policy.

New Direction adopts a positive relationships and restorative ethos. This means that the school will seek to understand behaviour, repair harm where safe and appropriate, and help pupils develop the skills to form respectful relationships. Restorative work will never replace safeguarding action, proportionate sanctions, protective measures or referrals to external agencies where these are required.

The school has a zero-tolerance approach to bullying. This means that all concerns will be taken seriously, investigated fairly, recorded appropriately and acted on proportionately. It does not mean that the school will make assumptions before an investigation is complete. The proprietor, leaders and staff are committed to creating a culture where bullying is not accepted as “banter”, “part of growing up” or “just a joke”. Pupils are encouraged to report concerns, whether they are experiencing bullying, witnessing bullying or worried about a friend.

2. Legal framework

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

- Education and Inspections Act 2006, including the duty to have measures to encourage good behaviour and prevent all forms of bullying among pupils.
- Education Act 2011.
- Equality Act 2010 and the public sector equality duty, as relevant to the school’s functions.
- Human Rights Act 1998.
- Protection from Harassment Act 1997.
- Malicious Communications Act 1988.
- Public Order Act 1986.
- Communications Act 2003.
- Crime and Disorder Act 1998.
- Voyeurism (Offences) Act 2019.
- Online Safety Act 2023.
- Data Protection Act 2018 and UK GDPR.
- The Education (Independent School Standards) Regulations 2014.
- DfE: Preventing and Tackling Bullying.
- DfE: Keeping Children Safe in Education 2025.
- DfE: Working Together to Safeguard Children 2026.
- DfE: Behaviour in Schools: Advice for headteachers and school staff.

- DfE: Searching, Screening and Confiscation at School.
- DfE: Relationships Education, Relationships and Sex Education and Health Education guidance, including the revised guidance for introduction from 1 September 2026.
- DfE: Mental Health and Behaviour in Schools.
- UKCIS: Sharing nudes and semi-nudes: advice for education settings working with children and young people.

Where this policy refers to statutory guidance, the school will follow that guidance unless there is a clear and defensible reason not to do so. Where there is any conflict between this policy and statutory safeguarding guidance, the Child Protection and Safeguarding Policy and current statutory guidance will take precedence.

3. Definitions

For the purpose of this policy, bullying is behaviour by an individual or group, usually repeated over time, that intentionally hurts, harms, intimidates, humiliates or excludes another individual or group. Bullying often involves an imbalance of power, whether actual or perceived.

Bullying is generally characterised by:

- **Repetition:** incidents are often repeated or form part of a pattern over time.
- **Intent:** the behaviour is intended to cause physical, emotional, social or psychological harm, or the person responsible should reasonably have known that harm would be caused.
- **Targeting:** the behaviour is directed at a particular individual or group.
- **Power imbalance:** the person or group responsible has, or is perceived to have, greater power, status, strength, confidence, social influence, online influence or access to information.

A single serious incident may also be treated as bullying, harassment, discrimination or a safeguarding concern where it involves significant harm, intimidation, prejudice, sexual harassment, online abuse, hate-related behaviour, exploitation or an abuse of power.

Bullying may occur face to face, indirectly, through others, through exclusion, through technology, on transport, in the community, during school activities, at alternative provision, or outside school where it affects a pupil's safety, wellbeing or education.

Pupils who may be particularly vulnerable to bullying include, but are not limited to:

- pupils with SEND or disabilities;
- looked-after children and previously looked-after children;
- pupils with a social worker or who have experienced adversity, trauma or abuse;
- pupils who are adopted or in kinship care;
- pupils with caring responsibilities;
- pupils from socioeconomically disadvantaged backgrounds;
- pupils who are LGBTQ+ or perceived to be LGBTQ+;
- pupils from Black, Asian, Gypsy, Roma, Traveller or minority ethnic backgrounds;
- pupils who experience racism, prejudice or discrimination because of religion or belief;
- pupils with health needs, mental health needs or medical conditions;
- pupils who are new to the school, including pupils joining in-year or pupils attending after previous placement breakdown;
- pupils who are perceived as different by others for any reason.

4. Types of bullying

Bullying can take many forms and can be related to almost anything, including appearance, race, culture, religion or belief, sex, sexual orientation, gender reassignment, disability, SEND, home circumstances, health, family background, social status, perceived difference or online activity.

Bullying may include:

- **Verbal bullying:** name-calling, insults, threats, comments, taunts, ridicule, sexualised comments, racist language, homophobic, biphobic or transphobic language, ableist language or deliberate misgendering.
- **Physical bullying:** hitting, kicking, pushing, taking or damaging belongings, intimidation, unwanted touching, physical threats or coercive behaviour.
- **Emotional or relational bullying:** excluding, isolating, manipulating friendships, spreading rumours, humiliating, controlling, coercing or ostracising someone.
- **Online or cyberbullying:** abusive messages, images, videos, posts, group chats, impersonation, doxxing, threats, harassment, sharing private information or using technology to intimidate or humiliate.
- **Racist bullying:** bullying based on ethnicity, nationality, culture, language, skin colour, immigration status or perceived racial identity.
- **Religious or belief-related bullying:** bullying related to religion, belief, non-belief, religious dress, customs or perceived faith identity.
- **Homophobic, biphobic and transphobic bullying:** bullying linked to actual or perceived sexual orientation, gender identity, gender expression or not conforming to gender stereotypes.
- **Sexist, sexual and misogynistic bullying:** bullying based on sex, gender stereotypes, sexual comments, sexual rumours, sexualised name-calling, harassment, image-based abuse or unwanted sexual attention.
- **Ableist bullying:** bullying linked to disability, SEND, support needs, communication needs, learning differences, medical needs or mental health.
- **Socioeconomic bullying:** bullying linked to poverty, clothing, possessions, housing, parental occupation, food, transport or perceived social status.
- **Prejudicial bullying:** bullying based on prejudice towards a protected characteristic or perceived difference.

Some bullying behaviours may also be criminal offences, safeguarding concerns, child-on-child abuse, discriminatory incidents or hate incidents. Staff must not attempt to decide alone whether an incident is criminal or safeguarding-related; concerns must be referred to the DSL or a Deputy DSL.

5. Roles and responsibilities

5.1 Proprietor

The Proprietor, Yvonne Evans, has overall responsibility for ensuring that the school has effective arrangements to promote pupil welfare, prevent bullying, meet safeguarding duties and comply with the Independent School Standards.

The Proprietor is responsible for:

- ensuring this policy is implemented, monitored and reviewed;

- ensuring that the policy does not discriminate against pupils on the basis of protected characteristics, SEND, background or vulnerability;
- ensuring that leaders analyse bullying and behaviour data to identify patterns, risks and areas for improvement;
- ensuring that the DSL has the appropriate status, authority, training, time and resources to carry out safeguarding responsibilities;
- ensuring that pupils are taught how to keep themselves and others safe, including online;
- ensuring that leaders promote an inclusive, anti-discriminatory and respectful culture.

5.2 Directors and senior leaders

The Directors, Luke Collins and Hannah Oliver, support the Proprietor in ensuring that the policy is understood, applied and monitored across the school and equine provision.

The Head of Education, Luke Collins, is responsible for the day-to-day implementation of this policy. This includes ensuring staff are trained, incidents are investigated, records are maintained, parents/carers and placing/local authorities are informed where appropriate, and trends are reviewed.

The Head of Equine Provision, Hannah Oliver, is responsible for ensuring that the same anti-bullying expectations apply within the equine provision, yard areas, outdoor learning, practical activities and any off-site or alternative provision activity led by the school.

The Head of Student Welfare and Communication, Nikki Morris, supports communication with pupils, parents/carers and external partners and helps coordinate pastoral follow-up, where appropriate.

The Behaviour Coordinator, Colette Rhodes, supports the consistent recording, monitoring and response to bullying-related behaviour through the school's behaviour systems.

5.3 DSL and Deputy DSLs

The DSL is Luke Collins. The Deputy DSLs are Hannah Oliver, Emily Smith and Nikki Morris. The DSL and Deputy DSLs are responsible for:

- ensuring that bullying incidents with safeguarding features are responded to in line with the Child Protection and Safeguarding Policy;
- making decisions about referrals to children's social care, the police, local authority services, early help or other agencies;
- ensuring that child-on-child abuse, sexual harassment, sexual violence, online abuse, exploitation, coercion, hate-related incidents and significant mental health concerns are recorded and escalated appropriately;
- ensuring relevant information is shared lawfully and proportionately with parents/carers, placing/local authorities and safeguarding partners;
- reviewing CPOMS records to identify patterns or risks.

5.4 Staff

All staff are responsible for:

- being alert to signs of bullying, including subtle, relational and online bullying;
- challenging unkindness, prejudice, discriminatory language, sexualised language and harmful behaviour immediately and proportionately;
- taking all reports seriously and avoiding assumptions;
- recording concerns promptly and accurately using the school's systems;
- referring safeguarding concerns to the DSL or a Deputy DSL without delay;
- supporting pupils who report bullying and ensuring they know what will happen next;

- maintaining confidentiality while recognising that safeguarding information must be shared with appropriate staff.

5.5 Parents and carers

Parents and carers are encouraged to work in partnership with the school by:

- reporting concerns about bullying as soon as possible;
- supporting their child to share concerns safely and not retaliate;
- working with the school to implement support plans, restorative work or behaviour interventions where appropriate;
- monitoring online activity and reporting cyberbullying or harmful content;
- treating staff, pupils and other families respectfully when concerns are being investigated.

5.6 Pupils

Pupils are supported and expected to:

- treat others with respect and kindness;
- tell a trusted adult if they are being bullied, have witnessed bullying or are worried about another pupil;
- avoid retaliation or counter-threats;
- keep evidence of cyberbullying, such as screenshots or messages, and show it to a trusted adult;
- take part in restorative or reflective work where it is safe and appropriate;
- contribute to a school culture where bullying, prejudice and discrimination are not accepted.

6. Statutory requirements and equality duties

The school recognises its duties under the Equality Act 2010 to eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity; and foster good relations between people who share a protected characteristic and those who do not.

The school will take particular care to identify and respond to bullying linked to protected characteristics, including disability, race, religion or belief, sex, sexual orientation and gender reassignment. The school will also consider the needs of pupils who are vulnerable due to SEND, trauma, care experience, mental health, family circumstances or social disadvantage. The school recognises that failing to respond appropriately to bullying may affect pupils' rights, welfare, safety, access to education and mental health. The school will take reasonable and proportionate steps to prevent and respond to bullying, including where it occurs online or outside school but affects the school community.

The school recognises that the Independent School Standards require effective arrangements for safeguarding and promoting pupils' welfare, promoting good behaviour, preventing bullying, promoting pupils' spiritual, moral, social and cultural development, and ensuring effective leadership and management.

7. Prevention

The school will clearly communicate a whole-school commitment to preventing bullying and promoting positive relationships. Prevention will be embedded through leadership, curriculum, staff practice, supervision, pastoral support, behaviour systems and safeguarding systems.

The school will prevent bullying by:

- promoting a culture of respect, kindness, inclusion and anti-discrimination;

- teaching pupils about healthy relationships, respectful behaviour, consent, boundaries, equality, online safety, prejudice, stereotyping, harmful sexual behaviour and how to seek help through PSHE/RSHE, tutor time, assemblies, ASDAN PSE, employability, Zones of Regulation, RE and wider independence curriculum work;
- reviewing the PSHE/RSHE curriculum during 2025-26 to prepare for the revised statutory RSHE guidance from 1 September 2026;
- using Newsround and tutor-time discussion to explore current issues, respectful debate, online safety and wellbeing in an age-appropriate way;
- building staff awareness of pupils who may be vulnerable to bullying or may display bullying behaviour due to unmet needs, trauma, peer dynamics, social communication needs or emotional regulation difficulties;
- planning transitions and slow inductions for new pupils, including regular check-ins with a trusted adult;
- using seating plans, groupings, supervision and environmental planning to reduce opportunities for bullying;
- providing safe spaces and trusted adults for pupils who feel threatened, overwhelmed or isolated;
- supporting pupils with social communication, emotional regulation and relationship skills;
- working with parents/carers and placing/local authorities where concerns emerge;
- providing staff training on bullying, child-on-child abuse, online safety, safeguarding, equality, SEND and trauma-informed practice.

The school will not rely only on pupils making disclosures. Staff will actively notice patterns, changes in behaviour, group dynamics, exclusion, repeated conflict, online concerns and pupil voice information.

8. Reporting bullying and raising concerns

Pupils can report bullying to any trusted adult, including a tutor, teacher, key adult, class lead, the Head of Student Welfare and Communication, the Behaviour Coordinator, the Head of Education, the DSL or a Deputy DSL.

Parents and carers can report bullying by contacting the school on 01246 810456 or by contacting the Head of Education, the Head of Student Welfare and Communication, the Behaviour Coordinator, the DSL or a Deputy DSL.

Staff must record and pass on concerns promptly. Where there is a safeguarding element, staff must report to the DSL or a Deputy DSL immediately and record the concern on CPOMS in line with the Child Protection and Safeguarding Policy.

The school will make reasonable adjustments to help pupils report concerns, including pupils with SEND, communication needs, anxiety, trauma responses or limited confidence. This may include using visuals, trusted adults, written accounts, social stories, emotion scales, communication aids or supported conversations.

Reports will be handled sensitively. Pupils will be told what will happen next, who needs to know, and how they will be kept safe. Staff will not promise absolute confidentiality where safeguarding action may be required.

9. Signs of bullying

Staff will be alert to signs that may indicate a pupil is experiencing bullying. These may include:

- fear of coming to school or travelling to and from school;

- repeated or persistent absence, lateness or requests to leave lessons or social spaces;
- changes in mood, confidence, behaviour, presentation, sleep, appetite or friendships;
- withdrawal, isolation, anxiety, low mood or emotional dysregulation;
- unexplained injuries, damaged possessions or missing belongings;
- loss of money, requests for additional money or signs of coercion;
- reduced engagement in learning or activities previously enjoyed;
- avoidance of phones, computers, social media or particular pupils;
- becoming distressed after receiving messages or notifications;
- self-harm indicators, suicidal thoughts, risk-taking behaviour or significant mental health concerns.

These signs may also indicate wider social, emotional, mental health, family or safeguarding concerns. Staff must respond with curiosity, care and professional vigilance.

Staff will also be alert to indicators that a pupil may be displaying bullying behaviour, including repeated targeting of others, controlling behaviour, use of discriminatory language, group intimidation, secretive online behaviour, escalating conflict, lack of empathy, peer pressure or behaviour linked to unmet needs.

10. Staff principles

- All reports of bullying will be taken seriously.
- Staff will act promptly when they become aware of bullying or suspected bullying.
- Unkindness, discriminatory language, sexualised language, harassment and intimidation will be challenged and not ignored.
- Staff will listen to pupils carefully, calmly and without judgement.
- Staff will not dismiss bullying as banter, teasing, personality clashes or a normal part of growing up.
- Staff will consider whether there is a safeguarding concern and will consult the DSL or a Deputy DSL where there is any uncertainty.
- Staff will protect the privacy and dignity of pupils, sharing information only with those who need to know in order to safeguard, investigate, support or monitor.
- Staff will recognise that pupils may not be ready, able or confident to make a direct disclosure.
- Staff will continue to monitor the situation after an incident to ensure that bullying has stopped and that no retaliation has occurred.

11. Child-on-child abuse

The school has a zero-tolerance approach to all forms of child-on-child abuse. All staff recognise that children can abuse other children and that this can happen inside school, outside school, online, in the community, during travel, in intimate relationships or through group dynamics.

Child-on-child abuse can include bullying, cyberbullying, physical abuse, sexual violence, sexual harassment, consensual and non-consensual sharing of nude or semi-nude images, upskirting, initiation or hazing type violence, coercive behaviour, teenage relationship abuse, exploitation, harmful sexual behaviour and abuse within intimate relationships.

All staff will:

- recognise that child-on-child abuse could happen here;

- treat all concerns seriously, regardless of the age, sex, gender, SEND, vulnerability or background of those involved;
- avoid victim-blaming and avoid language that minimises harm;
- understand that just because abuse is not reported does not mean it is not happening;
- challenge harmful sexual behaviour, misogyny, sexualised language, homophobia, biphobia, transphobia, racism, ableism and other discriminatory behaviours;
- refer concerns to the DSL or a Deputy DSL without delay.

Where an allegation involves sexual violence, sexual harassment, image-based abuse, coercion, exploitation, significant harm or risk of harm, the DSL will consider immediate safety, risk and needs assessments, separation arrangements, parent/carer communication, support for all pupils involved, referral to children's social care, police involvement and local authority notification where appropriate.

Pupils who report child-on-child abuse will be supported and protected from retaliation, intimidation or further harm. The school will consider whether alleged perpetrators need supervision, timetable changes, restricted contact, online safety measures or other protective arrangements.

12. Cyberbullying and online abuse

Cyberbullying is bullying using technology. It can take place through phones, computers, tablets, games, apps, group chats, social media, messaging platforms, images, videos, emails, online forums, anonymous accounts or emerging technologies.

Cyberbullying can be particularly harmful because it can reach pupils at any time, involve a wide audience, be shared quickly, be anonymous, leave a digital footprint and affect home life as well as school life.

Cyberbullying may include:

- threatening, intimidating, abusive or humiliating messages;
- sharing, threatening to share or manipulating images or videos;
- sexual comments, coercion, pressure or image-based abuse;
- impersonation, fake accounts or using another person's device or account;
- excluding someone from online groups or encouraging others to target them;
- posting private, embarrassing, discriminatory or defamatory information;
- recording or sharing incidents of bullying, fights or humiliation;
- doxxing or sharing personal information;
- online hate, harassment or discriminatory abuse.

Pupils and staff should not retaliate or respond to online abuse. Evidence should be preserved where safe to do so, such as screenshots, URLs, usernames, dates and times. Staff should not ask pupils to forward nude or semi-nude images. Such incidents must be handled in line with safeguarding guidance.

Where offensive content is posted online, the school will support pupils and families to use reporting and removal mechanisms. Where the person responsible is known to the school, leaders may request removal directly and take appropriate action.

The school may search, screen or confiscate devices where there is a lawful basis and good reason to do so, in line with the Searching, Screening and Confiscation Policy and current guidance. Staff must not view, copy or share sexual imagery unless there is a clear safeguarding need and this has been discussed with the DSL.

13. Procedures for responding to bullying

When bullying is reported or suspected, the school will respond promptly, proportionately and fairly. The exact response will depend on the nature, seriousness and context of the concern. The school will usually take the following steps:

- Ensure immediate safety and provide reassurance to the pupil who has reported or experienced bullying.
- Consider whether there is a safeguarding concern. If there is, inform the DSL or a Deputy DSL immediately and follow safeguarding procedures.
- Record the concern on Arbor as a behaviour/bullying incident. Where there is a safeguarding concern, record on CPOMS as well.
- Identify an appropriate member of staff to investigate, usually a senior leader, Behaviour Coordinator, DSL/deputy DSL or other suitable staff member depending on the nature of the incident.
- Speak to the pupil who has reported or experienced bullying, taking account of communication needs, SEND, trauma and emotional state.
- Speak separately to the alleged perpetrator and any witnesses. Pupils should not be placed together in a way that could intimidate, influence accounts or increase risk.
- Gather relevant evidence, such as written accounts, staff observations, Arbor/CPOMS records, CCTV where available, online evidence, screenshots, messages, photographs or reports from parents/carers.
- Avoid premature assumptions. Listen carefully and consider all available information.
- Inform parents/carers where appropriate and safe to do so. Where pupils are placed by a local authority, inform the placing authority where appropriate, especially if the incident affects safety, attendance, placement stability, EHCP provision or safeguarding.
- Decide whether bullying, harassment, discrimination, child-on-child abuse, a safeguarding concern or another behaviour concern has occurred.
- Implement proportionate protective measures, support, sanctions, restorative work and follow-up monitoring.
- Review whether the bullying has stopped and whether further action is needed.

If a pupil is injured, a first aider or appropriate medical lead will assess the pupil and records will be completed in line with the school's first aid and health and safety procedures. Serious injuries or concerns about assault will be escalated to the DSL and senior leaders.

Where a concern may constitute a criminal offence, hate crime, serious threat, sexual offence, exploitation or significant harm, the DSL or senior leader will consider police advice or referral alongside safeguarding procedures.

14. Sanctions, consequences and restorative approaches

Where the school concludes that bullying has taken place, the pupil responsible will be helped to understand the impact of their behaviour and the need to change. Consequences will be proportionate, consistent with the Behaviour Policy, and informed by the pupil's age, SEND, understanding, intent, previous behaviour, risk and the seriousness of the incident.

Possible responses may include:

- restorative conversation or reflective work where safe and appropriate;
- verbal warning and clear expectations for future behaviour;
- loss of privileges or structured time;
- detention or supervised time, where appropriate;

- parent/carer meeting;
- behaviour support plan or pastoral intervention;
- targeted work on empathy, relationships, online safety, prejudice, sexual harassment or emotional regulation;
- changes to grouping, seating, supervision, timetable, transport or social spaces;
- risk assessment or safety plan;
- internal suspension, fixed-term suspension or permanent exclusion where the incident is serious or persistent and in line with the Suspension and Exclusion Policy;
- referral to external services or multi-agency support.

Restorative work will only take place where it is safe, appropriate and agreed by the pupil who has experienced bullying. Pupils who have experienced bullying will never be pressured into face-to-face meetings, apologies or reconciliation.

Disciplinary action and support are not mutually exclusive. The school will support pupils who have bullied others to change their behaviour, while also making clear that bullying is unacceptable and has consequences.

The school will avoid unnecessarily criminalising pupils where possible, but it will not hesitate to contact the police or children's social care where there is serious harm, risk, criminal behaviour, sexual violence, exploitation, hate crime, repeated harassment or significant safeguarding concern.

15. Support for pupils who have experienced bullying

Pupils who have experienced bullying will be offered support according to their needs. This may include:

- immediate reassurance, emotional support and a trusted adult;
- a clear explanation of what action will be taken and how they will be kept safe;
- regular check-ins with a tutor, key adult, Head of Student Welfare and Communication, DSL/deputy DSL or other appropriate staff member;
- support to rebuild confidence, friendships and sense of safety;
- online safety advice and help to block, report or remove harmful content;
- support with preserving evidence of cyberbullying;
- liaison with parents/carers and, where appropriate, placing/local authorities;
- reasonable adjustments or additional support linked to SEND, communication needs, anxiety, trauma or mental health;
- referral to counselling, CAMHS, early help, social care or other external services where appropriate.

The school will not place responsibility on the pupil who has experienced bullying to resolve the situation by leaving the school. Where a pupil's needs, safety or placement require consideration of additional provision or a change of placement, this will be discussed with parents/carers, the placing/local authority and relevant professionals, and will be based on the pupil's best interests, safety, SEND/EHCP needs and welfare.

16. Follow-up support

The school will monitor both the pupil who experienced bullying and the pupil who displayed bullying behaviour after an incident. Follow-up will be proportionate to the seriousness and persistence of the concern.

Follow-up may include:

- daily or weekly check-ins initially, moving to less frequent reviews when safe;
- a formal review meeting within an agreed timeframe;
- parent/carer communication;
- review of Arbor and CPOMS records;
- monitoring of social spaces, groupings, transport, online concerns and lessons;
- support for peer relationships and emotional regulation;
- review of behaviour plans, risk assessments or safety plans;
- further action where bullying continues or retaliation occurs.

Where bullying has had a significant impact on a pupil's mental health, attendance, learning, safety or placement stability, the DSL and senior leaders will consider additional support and external agency involvement.

17. Bullying outside school

Bullying can occur outside school, including online, on transport, in the community, at clubs, during activities, at alternative provision or between pupils outside school hours. Where bullying outside school is reported to school staff, the school will investigate and act where the behaviour affects pupils' welfare, safety, education, relationships or the orderly running of the school.

The Head of Education may regulate pupils' conduct outside school where this is permitted by law and is linked to the school community, school activities, travel to and from school, online behaviour affecting school, or behaviour that poses a threat to another pupil, staff member or member of the public.

The school will work with parents/carers, placing/local authorities, transport providers, police, social care or other agencies where appropriate.

18. Record keeping, monitoring and data analysis

The school will keep robust records of all reported or identified bullying concerns, investigations, decisions, actions, support, sanctions, parent/carer communication, external agency contact and follow-up.

Bullying incidents will be recorded on Arbor as behaviour/bullying incidents. Where an incident raises a safeguarding concern, a CPOMS record will also be completed and shared with the DSL/deputy DSL in line with safeguarding procedures.

Records should include, where known and appropriate:

- date, time and location of incident;
- pupils involved and witnesses;
- type of bullying and whether it involved protected characteristics, prejudice, discrimination, online abuse, sexual harassment or child-on-child abuse;
- description of the concern and evidence gathered;
- immediate safety actions;
- parent/carer contact;
- placing/local authority contact where relevant;
- DSL/deputy DSL involvement and safeguarding decisions;
- sanctions, restorative work, support and referrals;
- follow-up dates and review outcomes.

The Head of Education, DSL, Head of Student Welfare and Communication and Behaviour Coordinator will review bullying information at least termly to identify patterns, including repeat

victims, repeat perpetrators, locations, times of day, online platforms, protected-characteristic themes, peer groups, curriculum or supervision issues.

Analysis will be used to strengthen prevention, staff training, supervision, curriculum, pupil support and policy review.

19. Monitoring and review

This policy will be reviewed at least annually by the Head of Education, DSL and Proprietor, or sooner if there are changes to statutory guidance, legislation, school structure, safeguarding practice or significant incidents.

The school will communicate relevant changes to staff, pupils, parents/carers and placing/local authorities as appropriate. Staff will receive training and reminders so that the policy is understood and applied consistently.

Appendix 1: Quick response pathway

Stage	Action
1. Listen and reassure	Take the concern seriously. Ensure immediate safety. Do not promise absolute confidentiality.
2. Safeguarding check	If there is risk of harm, sexual harassment/violence, exploitation, coercion, online sexual imagery, hate-related harm, significant injury or mental health risk, contact the DSL/deputy DSL immediately.
3. Record	Record bullying/behaviour on Arbor. Record safeguarding concerns on CPOMS.
4. Investigate	Speak to pupils separately, gather evidence, avoid assumptions, consider SEND/communication needs.
5. Decide and act	Determine whether bullying, discrimination, harassment, child-on-child abuse or another concern has occurred. Put support, protective measures and consequences in place.
6. Communicate	Inform parents/carers and placing/local authorities where appropriate and safe.
7. Review	Check that bullying has stopped, monitor for retaliation and update records.