Anti-Bullying Policy

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7	CGB	11.24	Slight adjustments to terminology of staff
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1. Policy Statement

At Luckley House School the whole community is based upon respect, good manners and fair play. We are committed to providing a safe and caring environment that is free from disruption, violence and any form of harassment so that pupils can develop their full potential. We expect staff and pupils to treat each other with courtesy and co-operation so that staff can teach and pupils learn in a relaxed, but orderly atmosphere.

All pupils should care for and support each other inside and outside of School.

Parents/Carers have an important role in supporting the School in maintaining high standards of behaviour. It is essential that School and homes have consistent expectations and that they co-operate closely together.

The School has a zero-tolerance approach to bullying. All forms of bullying are unacceptable, and any instances of bullying will be recorded and, where appropriate, met with disciplinary action in accordance with the Behaviour Management Policy.

This policy applies to all pupils, both Day and Boarding, and applies to actions undertaken both inside and outside of the School. It is available to parents of current and prospective pupils on the School website and on request and is communicated to all staff and pupils.

2. Definition of Bullying

There is no legal definition of bullying. For the purposes of this policy, the School defines bullying as behaviour by an individual or group, usually repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying often involves an imbalance of power, whether physical, psychological, social or otherwise, and can occur face-to-face or online. Not all harmful or unacceptable behaviour will meet the School's definition of bullying. A single incident may nevertheless constitute serious misconduct, harassment, discrimination, sexual harassment, sexual violence, assault or another safeguarding concern and will be responded to under the appropriate School policy. Staff should not delay reporting or responding to harmful behaviour because it does not meet the definition of bullying.

Bullying may take many forms including physical (including any threat of or use of violence of any kind), sexual (including the sharing of nudes/semi-nudes), verbal (including cyberbullying via text messages, email, social media, gaming, or other instant messages, and can include the use of images and video), and emotional (including by exclusion, being sarcastic, name-calling, tormenting, or spreading malicious rumours). It can involve manipulating a third party to tease or torment someone, and actions that fall short of direct participation where someone encourages others to bully or joins in with humiliating a victim.

Bullying can be overt or hidden and subtle. It often involves an imbalance of power between the perpetrator(s) and the victim(s) whether that be a physical, psychological (knowing what upsets someone), or intellectual imbalance, or by the perpetrator(s) having access to the support of a group, or the capacity to isolate the victim(s) socially.

Bullying can sometimes amount to child-on-child abuse, which is defined as abuse by one or more pupils against another pupil. It can be standalone or as part of wider abuse and can happen both inside and outside of School, and online. Further information about child-on-child abuse, including the procedures to follow when an incident on child-on-child abuse is reported can be found in the Child Protection and Safeguarding policy.

Bullying may be motivated by prejudice against particular groups involving actions or comments regarding a pupil's race, religion, gender, sexual orientation, special education needs and/or

disabilities (SEND), or certain health conditions, or because of a pupil's familial circumstances such as they are adopted, in care or have caring responsibilities. The School recognises that bullying may be discriminatory or prejudice-based and may relate to a protected characteristic or another aspect of a pupil's identity or circumstances. This may include race, ethnicity, religion or belief, sex, sexual orientation, disability, SEND, pregnancy or maternity, gender reassignment, socioeconomic circumstances, care experience or family circumstances. Staff must challenge discriminatory language and behaviour and must not allow stereotypes or assumptions to influence their response.

Bullying may be motivated by actual differences between pupils, or perceived differences (e.g. bullying can still be homophobic if directed towards a child that is perceived to be gay, whether or not this is the case).

Bullying can happen anywhere and at any time and can involve anyone including pupils, other young people, staff and parents.

Where an incident of bullying causes or is likely to cause significant harm to a pupil, the School will follow the procedures set out in the Child Protection and Safeguarding Policy.

3. Response to Bullying

The School always treats bullying, including allegations of bullying, very seriously. It conflicts sharply with the School's ethos and its social and moral principles relating to equal opportunities and will not be tolerated. When incidents of bullying do occur, they are dealt with quickly.

The School will never dismiss bullying as banter or horseplay, and all reported incidents of bullying will be dealt with by staff in accordance with this policy. Staff will reassure any victim(s) that they are being taken seriously and that they will be supported and kept safe. The School understands that bullying can be so serious that it may cause physical, emotional and psychological damage such as eating disorders, self-harm, and even suicide. Stopping violence and ensuring the immediate physical safety of pupils is the School's first priority.

The School acknowledges that emotional bullying can be more damaging than physical bullying, and therefore staff will use their discretion when dealing with an incident of bullying within the parameters of this policy and the Behaviour Management Policy. Whilst bullying is not a specific criminal offence, there are criminal laws which apply to harassment, sexual violence, assault, upskirting and violent and threatening behaviour. No one deserves to be a victim of bullying and everybody has the right to be treated with respect.

The School recognises that pupils with SEND or certain health conditions can face additional safeguarding challenges and may be more prone to child-on-child group isolation or bullying (including prejudice-based bullying) than other pupils. The School also recognises that certain pupils may face additional barriers to reporting an incident because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

The School will consider the needs and circumstances of both the pupil who has experienced bullying and the pupil who has engaged in bullying behaviour. Disciplinary consequences will be proportionate and consistent with the Behaviour Management Policy, while appropriate support, education and intervention will be considered to reduce the likelihood of recurrence.

Bullying which occurs on School trips or off School premises will not be tolerated any more than bullying on School premises. Teachers will, where appropriate, discipline pupils for misbehaviour off the School premises and outside School hours.

Staff will use their discretion when dealing with an incident of bullying within the parameters of this policy and the Behaviour Management Policy.

Where bullying or harassment is alleged to involve a member of staff, parent/carer or other adult, the School will respond under the relevant staff, complaints, safeguarding, disciplinary or other appropriate procedure. Where the behaviour involves a pupil, the School's Behaviour Management Policy may also apply.

Where a member of staff is the alleged victim of bullying or harassment, the School will provide appropriate support and ensure that the matter is managed through the appropriate staff or safeguarding procedures.

4. Signs of Bullying

Changes in behaviour that may indicate that a pupil is being bullied include:

- unwillingness to return to School
- displays of excessive anxiety, becoming withdrawn or unusually quiet
- failure to produce work, or producing unusually bad work, or work that appears to have been copied, interfered with or spoilt by others
- books, bags and other belongings suddenly going missing or are damaged
- changes to established habits (e.g. giving up music lessons, change to accent or vocabulary)
- diminished levels of self-confidence
- frequent visits to the Nurse with symptoms that may relate to stress or anxiety such as stomach pains and headaches
- unexplained cuts and bruises
- frequent absence, erratic attendance, or late arrival to class
- choosing the company of adults rather than peers
- displaying repressed body language and poor eye contact
- difficulty in sleeping, or experiencing nightmares
- talking of suicide or running away from home or School.

Although there may be other explanations for some of these signs, a repetition or combination of indicators should prompt staff and/or parents/carers to explore what may be happening and consider whether the pupil may require additional support or safeguarding intervention. Concerns should be reported and recorded in accordance with this policy and, where appropriate, the Child Protection and Safeguarding Policy.

5. Preventative Measures

The School's response to bullying does not start at the point at which a pupil has been bullied. We take preventative measures in order to create an environment that prevents bullying from becoming a problem in the first place.

Pupils

- The School promotes an ethos of good behaviour where pupils treat each other with respect at all times inside and outside of School
- All new pupils are briefed thoroughly on the School's expected standards of behaviour. They are told what to do if they encounter bullying, and those who report bullying in good faith will not be punished and will be supported
- We use assemblies to promote anti-bullying, and the PSHE (Life Skills) programme is structured to give pupils an awareness of their social and moral responsibilities as they progress through the School. This programme is structured to reinforce messages about community involvement and taking care of each other. It focuses on the importance of equality and diversity, and pupils are encouraged to avoid prejudicial and exclusionary language
- Life Skills explicitly teaches pupils to recognise cyberbullying and other forms of online intimidation and pupils are reminded of where they can report this

- Other lessons, particularly RS, English and Drama, highlight the issue of bullying and reinforce this message by developing social skills and by teaching moral and spiritual values that show bullying to be unacceptable
- Pupils can report bullying to any member of staff, their tutor, Head of Section, Head of Boarding, pastoral staff, DSL/DDSL, counsellor or through the School's pupil reporting mechanisms. Pupils may report concerns on behalf of themselves or another pupil.. They are reassured that they will be taken seriously and will be supported and kept safe.
- Parents and carers can report concerns to the School through the pupil's tutor, Head of Section, Head of Boarding, pastoral team or the School's published safeguarding/contact arrangements.
- All boarders know how to report anxieties to the Head of Boarding or to another member of the pastoral team
- All pupils have access to a telephone helpline enabling them to call for support in private
- The School buildings, including the boarding houses, display advice on where pupils can seek help, and include details of confidential help lines and websites where they can connect to external specialists such as Childline, Kidscape, Bullying UK and the Samaritans
- The School does not tolerate peer-group 'initiation ceremonies' or hazing rituals designed to cause pain, anxiety or humiliation. All staff remain alert to such actions.

Staff

- Upon induction, all new members of staff are given guidance on the Anti-Bullying Policy and on how to react to and record allegations of bullying at the School, including cyberbullying. The School will ensure that all staff understand the principles of the policy, the School's legal responsibilities, and the actions to be taken to resolve and prevent incidents of bullying from arising or escalating, and sources of further support
- The School recognises that certain pupils may be more at risk of bullying than others and who may require additional support when dealing with an incident of bullying (e.g. pupils with SEND or other potentially vulnerable pupils). The School will ensure that staff receive appropriate guidance and training where appropriate
- All reported incidents of bullying are recorded and investigated at once. Records are kept securely in the pastoral office and are carefully monitored in order that patterns of behaviour can be identified
- We have a strong and experienced pastoral team of tutors, Heads of Section and Boarding House staff who support the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSLs) and are trained in handling any incidents as an immediate priority and who are alert to possible signs of bullying and will know when to apply our Child Protection and Safeguarding Policy to bullying incidents
- The pastoral team gives support and guidance to other staff on handling and reporting incidents and on the follow-up work with both victims and bullies. INSET sessions are held, occasionally using outside experts
- The School Counsellors are an important part of our pastoral support team providing specialist skills in assessment and counselling. They are available to give confidential advice and counselling to pupils who can refer themselves *via* the Pastoral Care and Behaviour Co-ordinator, the Heads of Section or the Designated Safeguarding Lead (DSL) when they have social, emotional or behavioural concerns.
- The School maintains appropriate staff supervision when pupils are not in class, with particular attention given to areas and times where bullying may occur.In boarding houses there are teams of assistants supporting the Head of Boarding and who act *in loco parentis*. Staff are aware that boarding houses may provide more opportunities for bullying. The informal house environment is important in reinforcing standards and values, providing the opportunity for friendly, informal discussion of matters of concern to individual pupils outside the classroom. A member of the boarding house staff is always on duty. The School will comply with its obligations as set out in the National Minimum Standards
- The School has the right and duty to investigate incidents of bullying involving pupils that take place outside School hours, on School visits and trips, or that otherwise occur outside of School.

The School has the right to take disciplinary measures in respect of such incidents. Disciplinary measures will be taken in accordance with the Behaviour Management Policy and will be applied in a fair, consistent and reasonable manner, taking into account the needs of SEND and other potentially vulnerable pupils

- Staff will always consider the motive behind bullying behaviour and whether it raises any concerns for the welfare of the perpetrator. If staff suspect that a pupil may be suffering, or is likely to suffer significant harm, they should follow the procedures set out in the Safeguarding Policy and discuss their concerns with the Designated Safeguarding Lead (DSL) without delay.
- The School will seek the views of pupils affected by bullying, where appropriate, when reviewing the effectiveness of the response. Pupils will be given an opportunity to explain whether they feel safe, whether the bullying has stopped and whether further support is required.

Parents/Carers

- This Policy is available on the School website so that parents are well informed
- We encourage close contact between the tutors and the Heads of Boarding and parents, and will always make contact if there is concern about a pupil's well-being
- If parents know or suspect that their child, or another pupil, is being bullied, they should contact the School without delay
- We welcome feedback from parents on the effectiveness of these preventative measures and all other aspects of this policy.

6. Procedures for Dealing with Reported Bullying

The School ensures that all instances of, or concerns about bullying and cyberbullying, both on and off School premises, are easy to report and that they are recorded properly. Records of instances of bullying and allegations of bullying will be kept on the DSL's files and pupils' files. Records will also be kept relating to safeguarding, where appropriate, to enable the School to identify patterns of behaviour and evaluate the effectiveness of the policy.

The School recognises that pupils are likely to report bullying to someone they trust. The School also recognises that pupils may not find it easy to tell staff about bullying verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. All staff will be trained in handling an allegation and will be aware that they must listen to the pupil, not ask leading questions, and make a written record of the allegation to the best of their ability.

If an incident of bullying is reported, the following procedures are adopted:

- the member of staff to whom it is reported, or who first discovers the situation, will lead the situation (the Case Handler) and will reassure and support the pupils involved without promising absolute confidentiality
- the Case Handler will inform an appropriate member of the pastoral team about the bullying allegation as soon as possible
- where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm', staff should follow the procedures set out in the Child Protection and Safeguarding Policy rather than the procedure set out below.
- the victim and the alleged perpetrator will usually be interviewed individually by the Case Handler on their own (or, if appropriate, with a suitable person present for support) and asked to write their account of events
- where the Case Handler considers that the reported bullying behaviour may be criminal, or considers that there may be a risk of harm to someone, the Case Handler will discuss this with the DSLs and the Head, and will report the matter to the Police without delay as necessary

- the incident will be recorded on an incident form, signed and dated by the Case Handler. It will then be given to the DSL who is responsible for securely storing all records of bullying and other serious disciplinary offences. If this is not practicable, the incident must still be written down, signed and dated by the Case Handler, and held securely by the DSLs
- the DSL will inform tutors, and Boarding staff in the case of boarders, of both the alleged perpetrators and the victims as soon as possible. In very serious incidents, the Head will be informed
- victims will be interviewed at a later stage by a member of the pastoral team separately from the alleged perpetrators. They will be offered support to develop a strategy to help them. It will be made clear to them why any form of retaliation is inappropriate
- perpetrators will be interviewed at a later stage by a member of the pastoral team and separately from the victim, and it will be made clear why their behaviour was inappropriate and caused distress. They will be offered guidance on modifying their behaviour. The Behaviour Management Policy may also be invoked. Sanctions under the Behaviour Management Policy and/or Discipline and Exclusions Policy may include, for example, detention and the withdrawal of privileges. The School may exclude a pupil, either temporarily or permanently, in cases of severe or persistent bullying, or in the event that the support put in place for the perpetrators does not result in the appropriate modification of behaviour
- parents/carers of all parties may be informed and invited into School to discuss the matter and the appropriate sanctions under the Behaviour Management Policy and/or Discipline and Exclusions Policy. Their support should be sought in respect of preventative measures, and any concerns of either party will be addressed
- a way forward, including disciplinary sanctions and support for the perpetrator, should be determined and, where possible, agreed with all parties. This should recognise that suitable support is needed both for pupils who are being bullied and for those who bully others, as well as deal with appropriate disciplinary measures in accordance with the Behaviour Management Policy and/or Discipline and Exclusions Policy
- Where appropriate, and only following an assessment of the circumstances and the views and wishes of the pupils involved, the School may use a restorative or facilitated approach to help repair relationships. A victim will never be required to participate in a joint meeting with the pupil who has bullied them.
- Monitoring should normally include a planned review date and should continue for as long as necessary to establish that the bullying behaviour has stopped and that the pupil affected feels safe. The review should consider whether further support, intervention or safeguarding action is required in very serious cases, and only after the Head has been involved, it may be necessary to make a report to the Police or Social Services.

7. Cyberbullying

The way in which pupils relate to one another online can have a significant impact on the culture at school. Negative interactions online can damage the school's culture and can lead to the School feeling like an unsafe place. The School makes it clear to pupils that the same standards of behaviour are expected online as apply offline, and that everyone should be treated with kindness, respect and dignity.

Cyberbullying is bullying that takes place through digital technology, including social media, messaging services, gaming platforms, websites, email or mobile devices. It may involve messages, images, videos, exclusion from online groups, impersonation, threats, harassment, humiliation, the sharing of personal information or images, or encouraging others to participate in harmful behaviour. Cyberbullying can occur alongside face-to-face bullying and can take place inside or outside School.

Cyberbullying could involve communications by various electronic media, including for example:

- texts, instant messages or calls on mobile phones
- mobile phone camera images causing distress, fear or humiliation
- posting threatening, abusive, sexual, discriminatory, offensive or humiliating material or comments on websites (including blogs, personal websites and social networking sites such as Facebook, Instagram, WhatsApp, X (formerly known as Twitter) or YouTube
- using e-mail to message others in a threatening or abusive manner
- hacking/cloning e-mail accounts.

Cyberbullying may also involve artificial intelligence or other digital technologies, including the creation or manipulation of images, audio or video to impersonate, humiliate, threaten or sexually depict another person. This may include deepfakes or digitally manipulated sexual imagery. Such incidents will be treated seriously and may constitute a safeguarding concern, particularly where sexual imagery, coercion, threats or exploitation are involved.

The School acknowledges that cyberbullying may take many different forms including cyberstalking, exclusion or peer rejection, impersonation, unauthorised publication of private information or images, encouraging derogatory comments on online platforms, sharing nudes/semi-nudes, upskirting and sexting.

The School has a role to play in teaching pupils about the knowledge and behaviours that can help them navigate the online world safely and confidently regardless of the device, platform, or app. With reference to the DfE's RSE guidance (published July 2025), the school accepts that teaching pupils about recognising and managing cyberbullying is a priority.

8. Preventative measures

In addition to the preventative measures described above, the School:

- expects all pupils to adhere to its Acceptable Use Policy for the safe use of the Internet. Certain sites are blocked by a filtering system and the IT Department monitors pupils' Internet use
- may impose sanctions for the misuse, or attempted misuse of the Internet
- issues all pupils with their own personal School email address. Access to personal email sites such as Hotmail and all social media sites are not allowed inside the School
- some social media sites are opened for limited periods to allow boarders to make contact with friends and family; this is monitored by boarding staff
- ensures pupils are aware of the various forms in which cyberbullying can take, that it can have severe and distressing consequences, and that participation in cyberbullying will not be tolerated
- offers guidance on the safe use of social networking sites and cyberbullying in PSHE and ICT lessons that covers blocking, removing contacts from 'friend' lists and sharing personal data
- offers guidance on keeping names, addresses, passwords, mobile phone numbers and other personal details private and secure
- does not allow the use of cameras/mobile phone cameras in toilets, washing and changing areas or in the bedrooms of boarding houses.

Procedures for dealing with cyberbullying

The School will follow the procedures set out in this policy and in the Child Protection and Safeguarding Policy where relevant for incidents of cyberbullying, taking such disciplinary action that is considered reasonable in the circumstances, with a view to regulating pupil conduct and protecting the reputation of the School, and the welfare of its pupils.

Although cyberbullying is not a specific criminal offence, there are however criminal laws that may apply to communications of a harassing or threatening manner or the unauthorised publication of private images, upskirting, sharing nudes/semi-nudes, and sexting. Where the School considers that a reported incident of cyberbullying may amount to a criminal offence, it will inform the Police.

Where a concern involves the making or sharing of nudes or semi-nudes, staff must follow the specific procedures in the Child Protection and Safeguarding Policy and must not ask pupils to forward, copy or show images to them.

Electronic devices

Searches of pupils and their possessions, including electronic devices, will be conducted in accordance with the School's Behaviour Management Policy and the Department for Education guidance on Searching, Screening and Confiscation.

Where an electronic device has been lawfully confiscated following a search, authorised staff may examine data or files on the device where there is a good reason to do so, in accordance with the School's procedures.

Where a search is authorised and the statutory conditions are met, parental consent is not required for the search. The School will nevertheless inform parents/carers where appropriate, subject to safeguarding considerations.

Where staff suspect that a device contains a nude or semi-nude image of a child, they must not intentionally view, copy, print, save or share the image. The device should be secured and the matter referred immediately to the DSL or DDSL, who will determine the appropriate safeguarding response.

Where staff reasonably suspect that a device contains evidence of a criminal offence, the device and relevant evidence must be preserved and the Police consulted as appropriate. Staff must not delete potential evidence.

Any deletion of data must be undertaken only where permitted by the applicable guidance and School procedures, and after consideration of whether the material may constitute evidence of an offence or safeguarding concern.

9. Complaints Procedure

Parents and pupils may use the School's Complaints Procedure if they feel that their concerns about bullying have not been addressed appropriately. The School will ensure that complaints are handled in accordance with its published Complaints Policy. Where appropriate, concerns about safeguarding should also be raised through the School's safeguarding procedures.

As an independent school, complaints about the School may be referred to the Department for Education in accordance with the relevant external complaints arrangements. Where the School provides boarding provision, relevant concerns may also be considered by the appropriate regulatory or inspection body in accordance with its statutory functions.

10. Monitoring and Review

The School will record all incidents of reported bullying in accordance with this policy.

The Deputy Head (Pastoral) will review all incidents of reported bullying to help identify patterns of behaviour so that the School can take appropriate steps to address bullying behaviours within the School.

Records of bullying incidents will also be used to evaluate the effectiveness of the Anti-Bullying Policy and procedures and to highlight the need for any necessary amendments.

This policy is reviewed and updated at least annually by the Senior Leadership Team and Governors.

11. Appendix 1 – Related guidance

This policy has regard to:

- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children 2026
- Preventing and Tackling Bullying – DfE
- Behaviour in Schools – DfE
- Searching, Screening and Confiscation – DfE
- Relationships Education, Relationships and Sex Education and Health Education – DfE (July 2025, for introduction September 2026)
- Equality Act 2010
- the School's Child Protection and Safeguarding Policy
- the School's Behaviour Management Policy
- the School's Complaints Policy.