

Anti-Bullying Policy

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School:	<i>All Schools</i>
Issue:	2-7
Portfolio Director:	<i>Director of Education, Safeguarding & Standards</i>
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1. Policy Statement

- 1.1** Educ8 is committed to providing a safe, respectful and inclusive environment in which every learner is protected from bullying, harassment, discrimination, abuse and intimidation.

Bullying in any form is unacceptable and will not be tolerated.

- 1.2** Educ8 recognises that bullying can have a significant impact on a learner's safety, welfare, emotional wellbeing, attendance, engagement, educational achievement and sense of belonging.

The school will take reasonable steps to prevent bullying, identify concerns at the earliest opportunity and respond promptly, proportionately and effectively when concerns arise.

- 1.3** Bullying may also constitute, or be an indicator of, a safeguarding concern. Where behaviour raises safeguarding concerns, including concerns about child-on-child abuse, exploitation, sexual harassment, harmful sexual behaviour or significant harm, safeguarding procedures will take precedence and the Designated Safeguarding Lead (DSL) will be informed.

- 1.4** The school maintains a whole-school approach to preventing bullying through safeguarding, behaviour expectations, curriculum education, relationships and sex education, online safety, staff training, effective supervision, learner voice and partnership with parents, carers and relevant agencies.

2. Aims

This policy aims to:

- Prevent bullying so far as reasonably practicable;
- Create a culture in which bullying, harassment, discrimination and abusive behaviour are not tolerated;
- Ensure learners understand what bullying is and how to report concerns;
- Ensure staff recognise and respond appropriately to bullying and associated safeguarding concerns;
- Ensure concerns are recorded, assessed and responded to consistently;
- Protect and support learners who experience bullying;

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- Address the needs and behaviour of learners who bully others;
- Recognise and respond to bullying occurring online and outside school where it affects learners within the school community;
- Identify patterns, emerging themes and locations or circumstances where bullying may be more likely to occur;
- Ensure the voice, wishes, feelings and lived experience of the learner inform the school's response;
- Work appropriately with parents, carers and external agencies; and
- Ensure safeguarding information is shared lawfully, proportionately and when necessary to protect children.

3. Purpose & Scope

This policy applies to all Educ8 learners and to all staff, volunteers, agency staff and contractors working with learners.

The policy applies to bullying:

- On Educ8 premises;
- During lessons, breaks and other school activities;
- While travelling to or from school where the behaviour affects the welfare of learners;
- During educational visits and off-site activities;
- Within alternative provision or other education arranged by Educ8;
- Through social media, messaging services, gaming platforms, group chats and other online environments;
- Through mobile phones and other digital technology; and
- Outside school where the behaviour has an impact upon the safety, welfare, education or relationships of learners within Educ8.

Where behaviour occurring outside Educ8 raises safeguarding concerns, staff must respond in accordance with the Safeguarding and Child Protection Policy.

4. Definition Of Bullying

4.1

Bullying is behaviour by an individual or group, usually repeated over time, which intentionally hurts another individual or group physically or emotionally.

Bullying commonly involves an imbalance of power between those involved. This imbalance may be physical, psychological, social or intellectual, or may result

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from access to information, images, technology or the support of a wider peer group.

Bullying may be:

4.2

Verbal – including name-calling, insults, threats, intimidation, offensive comments or persistent teasing.

Physical – including hitting, kicking, pushing, unwanted physical contact, damaging or taking belongings or threatening physical harm.

Social or relational – including deliberately excluding someone, spreading rumours, humiliation, manipulating friendships or encouraging others to isolate an individual.

Online – including abusive or threatening messages, posts or comments; online harassment; impersonation; exclusion from online groups; sharing harmful content; misuse of photographs, videos or other images; or using digital technology to intimidate, humiliate or target another person.

Prejudice-based or discriminatory – including bullying connected to actual or perceived protected characteristics or other aspects of a person's identity, circumstances or vulnerability.

Sexual or sexist – including sexualised comments, jokes, rumours, gestures, unwanted sexual attention, sexual harassment, misogynistic behaviour or the sharing or threatened sharing of sexual images.

Bullying may also relate to appearance, family circumstances, care experience, socioeconomic circumstances, additional needs or any other perceived difference.

4.3

Not every disagreement, friendship difficulty or isolated incident constitutes bullying.

However, staff must not dismiss harmful behaviour simply because it has occurred once. A single incident may constitute harassment, violence, abuse or another safeguarding concern and must be considered according to the nature, context, impact and risk involved.

5. Bullying and Safeguarding

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Bullying and safeguarding are closely connected.

5.1

Bullying may constitute child-on-child abuse or may indicate that a learner is experiencing wider harm or vulnerability.

All staff must be alert to the possibility that behaviour initially presented as bullying may involve:

- Physical abuse;
- Sexual violence or sexual harassment;
- Harmful sexual behaviour;
- Intimate relationship abuse;
- Prejudice-based or discriminatory abuse;
- Online abuse or harassment;
- Coercion, intimidation or threats;
- Exploitation;
- Sharing or threatening to share nude or semi-nude images;
- Extortion or financially motivated sexual extortion;
- Criminal behaviour;
- Serious violence; or
- Other forms of child-on-child abuse.

Child-on-child abuse can occur inside or outside school and online.

5.2

Staff must never dismiss abusive behaviour as "banter", "having a laugh", "part of growing up" or similar language.

5.3

The absence of reported bullying does not necessarily mean that bullying is not occurring. Staff must remain professionally curious and alert to changes in behaviour, attendance, presentation, relationships and engagement that may indicate a learner is experiencing harm.

5.4

Where there is any indication that bullying may constitute a safeguarding concern, staff must report the concern to the DSL or Deputy DSL and record the concern promptly on **CPOMS** in accordance with Educ8 safeguarding procedures.

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Where there is an immediate risk of harm, staff must seek immediate assistance from the DSL or Deputy DSL and must not delay safeguarding action in order to complete the CPOMS record.

Where the incident also constitutes a behaviour or bullying incident, an appropriate record should also be made on **Arbor** in accordance with Educ8's behaviour recording procedures.

6. Vulnerability and Additional Considerations

6.1 Educ8 recognises that any learner may experience bullying, but some learners may be particularly vulnerable because of their circumstances, needs, identity or perceived difference.

This may include learners:

- With SEND or additional communication needs;
- With disabilities or medical needs;
- Who are or have been known to children's social care;
- Who are looked after or previously looked after;
- Experiencing difficulties at home;
- Experiencing poor mental health or emotional wellbeing;
- Who are socially isolated;
- Experiencing persistent or severe absence;
- Who are perceived as different by their peers; or
- Who may find it difficult to recognise, describe or report bullying.

6.2 Staff must consider whether a learner requires reasonable adjustments or additional support to understand what has happened, communicate their experiences or participate in any investigation.

7. Prevention

7.1 Educ8 will seek to prevent bullying through a whole-school approach which includes:

- Clear standards and expectations of behaviour;
- A safeguarding culture in which learners feel able to speak to trusted adults;

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- Appropriate staff supervision;
- PSHE and relationships education;
- Online safety education;
- Teaching about respectful relationships, equality and diversity;
- Challenging discriminatory, prejudicial, sexualised and abusive language;
- Staff safeguarding and behaviour training;
- Learner voice;
- Pastoral support;
- Identifying patterns and emerging themes;
- Appropriate risk assessment and safety planning; and
- Working with parents, carers and external agencies where appropriate.

7.2 Staff are expected to model respectful relationships and challenge inappropriate behaviour consistently.

8. Reporting Bullying

8.1 Any learner who experiences or witnesses bullying is encouraged to report it.

A concern may also be raised by:

- Another learner;
- A parent or carer;
- A member of staff;
- A visitor;
- An external professional; or
- Any other person who becomes aware of the concern.

8.2 Learners may report concerns to any member of staff or trusted adult within Educ8.

Staff receiving a disclosure or report must listen carefully, take the learner seriously and avoid making promises of confidentiality that cannot be maintained.

8.3 Learners must be reassured that reporting bullying is the right thing to do and that they will be supported.

No learner should be made to feel responsible for the behaviour they have experienced.

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9. Responding to Bullying

9.1 When a concern is reported or identified, staff will respond promptly and proportionately.

The response should include, as appropriate:

1. Ensuring the immediate safety and welfare of the learner;
2. Listening to and recording the learner's account;
3. Considering the wishes and feelings of the learner;
4. Establishing the nature, context and impact of the behaviour;
5. Considering whether there is an immediate safeguarding risk;
6. Informing the DSL where safeguarding concerns exist;
7. Gathering relevant information from those involved; and
8. Recording the incident appropriately on **Arbor and/or CPOMS according to the nature of the concern**, ensuring that safeguarding concerns, decisions and actions are recorded on CPOMS;
9. Considering the needs of all learners involved;
10. Informing parents and carers where appropriate and safe to do so;
11. Implementing appropriate behaviour consequences and support;
12. Considering whether a risk assessment or safety plan is required;
13. Considering whether external agency involvement is necessary; and
14. Reviewing the situation to establish whether the behaviour has stopped and whether further intervention is required.

9.2 Responses will be child-centred and proportionate to the circumstances.

The school will avoid automatically requiring learners who have experienced bullying or abuse to participate in restorative work with the learner responsible for the behaviour.

Restorative approaches will only be considered where they are appropriate, safe and in the interests of the learners involved.

10. The Voice of The Child

10.1 The learner's voice is central to Educ8's response.

Staff should seek to understand:

- What happened;

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- How the learner experienced the behaviour;
- How safe they currently feel;
- Whether the behaviour has happened previously;
- Whether other learners are involved or affected;
- What the learner is worried may happen next;
- What support they feel would help; and
- Their wishes and feelings about what happens next.

10.2 The learner's wishes and feelings should inform decision-making but will not override the school's responsibility to safeguard them or other children.

Staff should explain, in an age-appropriate way, what action is being taken and why.

11. Support For Learners

11.1 Learners Experiencing Bullying

Support may include:

- A trusted adult;
- Regular pastoral check-ins;
- Mentoring or counselling;
- Safe spaces;
- Adjustments to arrangements within school;
- Support with peer relationships;
- Online safety support;
- Risk assessment or safety planning;
- Liaison with parents and carers; and
- Referral to appropriate external services.

11.2 Learners Displaying Bullying Behaviour

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Learners displaying bullying behaviour will be held appropriately accountable for their actions while also being provided with support to understand and change their behaviour.

Staff should consider whether the behaviour may indicate unmet needs, vulnerability, previous experiences of harm or exposure to harmful behaviour.

Where appropriate, support may include:

- Pastoral intervention;
- Behaviour support;
- Targeted education;
- Work around relationships and empathy;
- Online safety education;
- Risk assessment;
- Parental involvement; and
- Referral to external services.

Safeguarding concerns relating to a learner displaying harmful behaviour must be considered separately from any disciplinary response.

12. Online Bullying

12.1 Online bullying can occur at any time and may reach a large audience rapidly. Content may remain available and may be copied or redistributed beyond the control of the person originally posting it.

12.2 Online bullying may include:

- Abusive or threatening messages;
- Harassment through social media or messaging applications;
- Harmful group chats;
- Spreading rumours online;
- Impersonation or creation of false accounts;
- Deliberately excluding someone from online groups;
- Sharing photographs or videos to humiliate another person;
- Sharing private information;
- Discriminatory or prejudicial content;

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- Sexual harassment;
- Manipulated or AI-generated images or content used to target another person; and
- Sharing or threatening to share intimate images.

Educ8 will seek to prevent online bullying through online safety education, appropriate supervision and monitoring, clear expectations for the responsible use of technology, and by supporting learners to recognise, report and respond safely to harmful online behaviour.

12.3 Where online behaviour raises a safeguarding concern, staff must follow the Safeguarding and Child Protection Policy and Online Safety procedures.

Staff must not unnecessarily view, copy, download, print or distribute intimate images of children.

13. Parents and Carers

13.1 Educ8 will work in partnership with parents and carers to prevent and respond to bullying.

Parents and carers are encouraged to report concerns as early as possible.

13.2 Parents and carers of learners involved in bullying will normally be informed where appropriate.

However, where a concern constitutes or may constitute a safeguarding matter, the DSL will determine when and how to inform parents or carers.

Parents or carers must not be informed where doing so could place a child at increased risk of harm, prejudice a safeguarding enquiry or investigation, or otherwise be contrary to the child's welfare.

14. Information Sharing and Confidentiality

14.1 Effective information sharing is an essential part of safeguarding and promoting the welfare of children. No single practitioner can have a complete picture of a child's needs and circumstances, and relevant information must be shared

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appropriately to support the early identification of need, assessment of risk and protection of children.

Educ8 will follow the information-sharing requirements applicable from September 2026, alongside *Working Together to Safeguard Children 2026*, data protection legislation and relevant statutory safeguarding guidance.

- 14.2** Where bullying raises, or may raise, safeguarding concerns, staff must not allow uncertainty about information sharing, confidentiality, consent or data protection to prevent appropriate safeguarding action.

Information should be shared where this is necessary to safeguard or promote the welfare of a child and in accordance with the applicable statutory information-sharing duty and safeguarding guidance.

- 14.3** Practitioners should be proactive in sharing relevant safeguarding information as early as possible where this is necessary to:

- Identify emerging needs or risks;
- Assess the nature and extent of harm;
- Protect a learner or other children from harm;
- Support effective decision-making;
- Enable appropriate help, support or intervention;
- Contribute to effective multi-agency safeguarding arrangements; or
- Prevent concerns from escalating.

- 14.4** Information sharing should be understood as part of effective safeguarding communication and multi-agency working. Where information is shared with another organisation or agency, appropriate communication should support an understanding of what action has been taken and any further action required.

- 14.5** Information shared for safeguarding purposes should be:

- Necessary for the safeguarding purpose;
- Relevant to the concern;
- Proportionate to the identified need or risk;
- Accurate and, where necessary, up to date;
- Shared securely;
- Shared in a timely manner; and

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- Limited to the information required to achieve the safeguarding purpose.

14.6 Consent is not always required to share personal information for safeguarding purposes.

Where there is a lawful basis to share information to safeguard or promote the welfare of a child, information may be shared without consent where this is necessary and proportionate.

Staff should be open and transparent with learners and parents or carers about information sharing wherever it is appropriate and safe to do so. Information should not be disclosed to a parent, carer or other person where doing so could place a child or another person at increased risk, prejudice an investigation or otherwise undermine safeguarding action.

14.7 Data protection legislation does not prevent appropriate information sharing for safeguarding purposes.

Staff must consider the safeguarding purpose of sharing information and apply professional judgement rather than assuming that confidentiality or data protection requirements prevent information from being shared.

14.8 Where bullying involves concerns about more than one learner, information relating to each child must be considered separately. Information about another child or family should not be unnecessarily disclosed when communicating with parents or carers.

14.9 Where safeguarding information is shared, records should identify:

- What information was shared;
- With whom it was shared;
- The date and method of sharing;
- The safeguarding purpose for sharing;
- Any relevant decision regarding consent;
- Any significant decision not to share information and the reason for that decision;
- Advice sought where applicable; and

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- Any response, outcome or further action arising from the information shared.

14.10 Where staff are uncertain about whether information should be shared, they must seek advice from the DSL.

Seeking advice must not cause unnecessary delay where a learner or another child may be at risk of harm.

14.11 Where appropriate, the DSL will work collaboratively with children's social care, police, health services, education partners and other relevant agencies to ensure that information contributes to a coordinated understanding of the child's circumstances, needs and risks.

The child's voice, wishes, feelings and lived experience should remain central to safeguarding decision-making and multi-agency working.

15. Recording

15.1 All reported or identified bullying incidents must be recorded appropriately according to the nature and circumstances of the concern.

Arbor is used to record behaviour and bullying incidents, including the nature of the behaviour, relevant bullying category, actions taken and behaviour consequences or interventions.

CPOMS is used to record safeguarding concerns and the safeguarding chronology relating to a learner.

15.2 Where bullying raises or may raise a safeguarding concern, the concern must be recorded promptly on CPOMS and brought to the attention of the DSL or Deputy DSL in accordance with Educ8 safeguarding procedures.

The CPOMS record should include, where relevant:

- What happened, was observed, heard or disclosed;
- The learner's own words where appropriate;
- The learner's voice, wishes and feelings;

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- Relevant context and known previous concerns;
- Immediate safeguarding action taken;
- Decisions made and the rationale for those decisions;
- Discussions with the DSL or Deputy DSL;
- Contact with parents or carers where appropriate;
- Referrals, consultations or information shared with external agencies;
- Risk assessments or safety planning;
- Support provided; and
- Follow-up actions and outcomes.

15.3

Where an incident is primarily a behaviour or bullying matter and does not raise a safeguarding concern, it should be recorded appropriately on Arbor in accordance with Educ8's behaviour recording procedures.

Where an incident involves both behaviour and safeguarding concerns, appropriate records may be required on both Arbor and CPOMS.

Recording an incident on Arbor does not replace the requirement to report a safeguarding concern to the DSL or Deputy DSL or to record safeguarding information on CPOMS.

15.4

Records must be:

- Timely;
- Accurate;
- Factual;
- Proportionate;
- Confidential; and
- Child-centred.

Records must distinguish between fact, observation, allegation, opinion and professional judgement and should clearly identify actions taken, decisions made and the rationale for significant safeguarding decisions.

15.5

Staff must avoid unnecessary duplication of sensitive safeguarding information between systems.

Where information is recorded on both Arbor and CPOMS, the information recorded must be appropriate to the purpose of each system. Detailed safeguarding information should be recorded on CPOMS and access restricted in

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accordance with Educ8's safeguarding and information governance arrangements.

- 15.6** Records must be reviewed where appropriate to ensure that actions have been completed, support remains effective and repeated incidents or developing patterns are identified.

16. Monitoring, Review and Quality Assurance

Educ8 will monitor bullying incidents to identify:

16.1

- Repeated incidents;
- Learners experiencing repeated harm;
- Learners displaying repeated harmful behaviour;
- Peer-group patterns;
- Prejudice-based or discriminatory bullying;
- Online trends;
- Locations or times where incidents occur more frequently;
- Links with attendance, behaviour or safeguarding concerns; and
- Emerging safeguarding themes.

- 16.2** Individual incidents must not be considered in isolation where there is evidence of a developing pattern.

- 16.3** School leaders and the DSL will review relevant information recorded on Arbor and CPOMS, within their respective areas of responsibility and access, to identify repeated incidents, patterns, emerging risks and links between behaviour, bullying, attendance and safeguarding concerns.

Safeguarding records will be reviewed to ensure that appropriate action has been taken, decisions and rationale are clearly recorded and support remains effective.

- 16.4** The Head of Safeguarding will use relevant safeguarding information and aggregated data from CPOMS and Arbor, as appropriate, to identify group-wide themes, emerging risks, training requirements and areas for improvement

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- 16.5** Relevant themes and assurance information will be reported through Educ8's safeguarding reporting arrangements to the Proprietor and Executive Board as appropriate.

17. Roles and Responsibilities

17.1 Proprietor/ Executive Board

The Proprietor/Executive Board are responsible for ensuring that Educ8 has an effective anti-bullying strategy and that appropriate arrangements are in place to safeguard and promote the welfare of learners.

They will receive appropriate assurance information regarding bullying, safeguarding themes, emerging risks and the effectiveness of arrangements, and will provide appropriate challenge and oversight.

17.2 School Leaders

School leaders are responsible for ensuring this policy is implemented consistently and effectively within their site and that staff understand their responsibilities.

17.3 Head of Safeguarding

The Head of Safeguarding provides strategic oversight of safeguarding aspects of this policy, supports consistent practice across Educ8 and monitors themes and emerging risks.

17.4 Designated Safeguarding Lead

The DSL is responsible for considering and coordinating the response to bullying where safeguarding concerns arise and for ensuring appropriate referrals, information sharing, recording and multi-agency working.

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17.5 All Staff

All staff are responsible for:

- Promoting respectful behaviour;
- Challenging bullying, discriminatory and abusive behaviour;
- Listening to learners;
- Responding promptly to concerns;
- Recognising when bullying may constitute a safeguarding concern;
- Reporting safeguarding concerns to the DSL or Deputy DSL; and
- Recording behaviour and safeguarding concerns appropriately on Arbor and/or CPOMS in accordance with Educ8 procedures, recognising that recording on Arbor does not replace safeguarding reporting and recording requirements.

18. Relevant Legislation and Guidance

18.1

This policy has been developed with regard to relevant legislation, statutory guidance and national safeguarding guidance applicable to the 2026/27 academic year, including:

- Keeping Children Safe in Education 2026;
- Working Together to Safeguard Children 2026;
- the Children Act 2004, as amended by the Children’s Wellbeing and Schools Act 2026, including the new statutory information-sharing duty and applicable statutory guidance;
- Preventing and Tackling Bullying – Department for Education;
- Education (Independent School Standards) Regulations 2014;
- Equality Act 2010;
- Children Act 1989;
- Children Act 2004;
- Data Protection Act 2018;
- UK General Data Protection Regulation (UK GDPR); and
- relevant local multi-agency safeguarding arrangements and procedures.

19. Linked Educ8 Policies and Procedures

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This policy should be read alongside:

- Safeguarding and Child Protection Policy;
- Behaviour Policy;
- Online Safety Policy;
- Equality, Diversity and Inclusion Policy;
- Attendance Policy;
- SEND Policy;
- Relationships and Sex Education Policy;
- Complaints Policy;
- Staff Code of Conduct; and
- relevant safeguarding recording and reporting procedures.

20. Metrics and Assurance

The following information may be monitored at site and group level:

- number of reported bullying incidents;
- number and nature of repeated incidents;
- categories and themes of bullying;
- prejudice-based and discriminatory incidents;
- online bullying incidents;
- incidents escalated as safeguarding concerns;
- patterns involving particular locations, times or peer groups;
- actions and interventions undertaken;
- timeliness and completion of agreed actions and follow-up;
- recurrence following intervention; and
- relevant learner voice and safeguarding themes.

Data will be considered alongside contextual safeguarding information and will not be interpreted solely on the basis of the number of reports. An increase in reporting may reflect increased learner confidence in reporting concerns rather than an increase in bullying itself.

21. Review

This policy will be reviewed at least annually and earlier where required as a result of:

- Changes to legislation or statutory guidance;
- Safeguarding developments;

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- Emerging patterns or risks;
- Learning from incidents;
- Inspection or audit findings; or
- Changes to Educ8's provision or operating arrangements;
- Feedback and themes identified through learner voice.

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Issue & Revision History

Issue	Description	Author	Effective Date
1.0	Initial Release	D.Payne	29/08/17
2.0	Re-write	D. Payne	11/09/19
2.1	Annual Review	S.Thornton	15/10/21
2.2	Update 8.1 Policy Aims 8.4 Preventative measures	O. Howell	07/02/22
2.3	Annual Review Reference to KCSIE '22 Reference to MyConcern	S. Thornton	01/09/22
2.4	Annual Review 1. Removal of general incident form	J. Payne	04/07/23
2.5	Annual Review Removed My Concern from definitions Update 8.1protected characteristics Reviewed 8.7 Witnesses will be required to write and sign an account of the incident	J. Payne	21/07/24
2.6	Annual Review MIS to replace incident report form throughout policy Safeguarding Director has responsibility for policy development	J. Payne	26/08/25
2.7	Annual Review	D. Payne	01/09/26