



# Greenfields School Anti-Bullying Policy 2025-26

<b>Implemented</b> <b>August 2023</b>	<b>By Whom</b> <b>J. Parry</b>	<b>Last Review</b> <b>March 2026</b>	<b>By Whom</b> <b>R. Redman</b>	<b>Next Review</b> <b>March 2027</b>
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08/23	1	J. Parry	Review and amendment
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*This policy aligns with the ALN Code (Wales) 2021, the Equality Act 2010, the UNCRC, the Independent School Standards (Wales) Regulations 2024*

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**This policy has been developed in line with the following legislative framework and government guidance:**

- Rights, Respect, Equality' (2019) statutory guidance
- Newport Local Authority Safeguarding & Anti-Bullying Framework
- United Nations Convention on the Rights of the Child (UNRC)
- Rights of Children & Young Persons (Wales) Measure (2011)
- Keeping Learners Safe WAG (2022)
- Equality Act 2010
- The Independent Schools Standards (Wales) Regulations 2024
- Rights, respect, equality: Statutory guidance for governing bodies of maintained schools (2019)
- Public Order Act 1986
- Protection from Harassment Act 1997
- Malicious Communications Act 1988
- Communications Act 2003
- Curriculum for Wales (2022)
- Wales Safeguarding Procedures (2019)
- ALN Code (ALNET Act 2018)
- Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015
- Newport City Council Bullying Reporting Pathways

## Greenfields School: Culture – Ethos – Mission

### Our School

Greenfields School is an independent special school for young people with Social, Emotional and Mental Health (SEMH) difficulties for both boys and girls aged 9-16 years old. The school is registered for up to 30 learners and consists of 2 small primary style transition classes to provide a nurturing environment to develop and progress throughout the learning journey and the pupils transition to Secondary education; as well as providing English, Maths, Science, Expressive Arts, Humanities, PSE and PE lessons for our older learners. We are a school that is able to support children and teenagers who suffer with trauma or mental health problems and whose troubled behaviour acts as a barrier to learning. Located in Newport we therefore benefit from some amazing community spaces where we enhance our curriculum with equestrian skills, free running, farm skills, pottery painting, outdoor learning, swimming lessons, boxing and fitness classes. All the staff at Greenfields School are committed to creating a setting which not only focuses on academic success, but also provides our learners opportunities to develop their social, communication and independent skills.

Greenfields School reflects the principles of Cymreictod (Welsh identity), local Newport heritage and community values within its approach to relationships, behaviour and anti-bullying. Learners are supported to understand their rights under the UNCRC and their responsibilities as members of a Welsh learning community.

### Mission Statement

Preparing learners for the future by providing a sustainable outstanding educational experience where all learners realise pursue and achieve their full potential, enabling them to thrive as adults. This Anti-Bullying Policy supports the *Four Purposes* of the Curriculum for Wales by developing confident, ethical and healthy individuals who can form positive relationships and contribute to their communities.

### The school's approach:

Our core values at Greenfields School, are those of 'Present, Respectful and Engaged' and we are committed to providing a happy, caring, friendly and safe school environment and community for all of our young people and staff so they can thrive, develop and progress in a relaxed and secure atmosphere. As a school focused on trauma informed practice, we are committed to promoting the positive mental health and emotional well-being of both staff and pupils.

## Definition of bullying

### School definition of bullying:

Bullying is hurtful, unkind or threatening behaviour which is deliberate and repeated. It is a breach of the UN Convention on the Rights of the Child.

Bullying can be carried out by an individual or a group of people towards another individual or group, where the bully or bullies hold more power than those being bullied. If bullying is allowed it harms the perpetrator, the target and the whole school community. The vision and values of the school should lead to a diminishing of any such behaviour.

The Anti-Bullying Alliance defines bullying as: “***The repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power***” (2015). It can happen face-to-face or through cyberspace (on-line, via social media or texting).

We refer to the acronym below, to help children understand that bullying is hurtful behaviour that happens:

- **S**everal
- **T**imes
- **O**n
- **P**urpose

At Greenfields School, bullying is addressed within the framework of Rights, Respect, Equality (Welsh Government 2019). We recognise all forms of identity-based bullying, including prejudice-related bullying linked to ALN, gender identity, race, Welsh language use, care-experienced status, and socio-economic disadvantage.

### The nature of bullying can be:

- Physical (e.g. hitting, kicking, pushing or inappropriate/unwanted physical contact)
- Verbal (e.g. name calling, ridicule, derogatory comments, threats)
- Cyber (e.g. messaging, social media, email, on-line gaming platforms)
- Emotional/indirect/segregation (e.g. excluding someone, spreading rumours)
- Visual/written (e.g. graffiti, gesture, wearing racist insignia)
- Theft of or damage to personal property
- Threat with a weapon
- Theft of extortion
- Persistent over time / frequency

Where incidents do not meet the threshold for bullying, they are still recorded on BehaviourWatch either as incidents or contact logs as part of our safeguarding and wellbeing monitoring systems and reviewed weekly by SLT.

### Bullying could be based on many things, including prejudice-based bullying that targets:

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- Race
- Religion or belief
- Special Educational Needs or disability
- Culture or socio-economic background
- Appearance or health conditions
- Sexual orientation or Gender identity (homophobic, biphobic, transphobic)
- Gender
- Related to home or other personal circumstances

### What is not bullying?

- **friendship fallouts** – a friendship feud may however deteriorate into bullying behaviour that is enabled by the fact that former friends have an intimate knowledge of the fears and insecurities of one another;
- **a one-off fight** – guidance expects this situation to be addressed according to the school's Behaviour Policy unless it is part of a pattern of behaviour that indicates intentional targeting of another individual;
- **an argument or disagreement** – between two children or young people is not generally regarded as bullying. Nevertheless they may require assistance to learn to respect one another's views;
- **a one-off physical assault**- guidance expects it to be stopped and addressed immediately. Police involvement in cases where physical assault has happened may also be appropriate;
- **insults and banter** – children and young people will often protest that an incident was a joke or banter. If two friends of equal power are in the habit of bantering with one another it is not deemed to be bullying. If one learner uses banter to humiliate or threaten another who is powerless to stop it and made fearful by the act, the border between banter and bullying is likely to be crossed

### Bullying behaviour: the law

#### Harassing or threatening behaviour/communications

Although bullying itself is not a criminal offence, some types of harassment, threatening behaviour and/or communications may be considered criminal offences:

- Under the Malicious Communications Act 1988, it is an offence for a person to electronically communicate with another person with the intent to cause distress or anxiety, or in a way which conveys a message which is indecent or grossly offensive, a threat, or contains information which is false and known or believed to be false by the sender;
- The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct amounting to harassment;
- Section 127 of the Communications Act 2003 makes it an offence to send, by means of a public electronic communications network, a message, or other matter, that is grossly offensive or of an indecent, obscene or menacing character. It is unlawful to disseminate defamatory information through any media, including internet sites;

- Sexual Harassment and Sexual Violence can be considered as offences under the Sexual Offences Act 2003;
- Other forms of bullying, which are illegal and should be reported to the police include: violence or assault, theft, repeated harassment or intimidation and hate crimes.

If school staff feel that an offence may have been committed, they should seek assistance from the police. In Wales, bullying incidents that constitute harm or risk of harm must be escalated according to the Wales Safeguarding Procedures (2019) and the school's Child Protection Policy.

## Roles and responsibilities

**Every member of the school community is responsible for working together to create an environment where bullying cannot thrive. As an example of best practice, a school should make it explicit how it has consulted with and involved learners and parents in producing and reviewing this policy.**

### **The Proprietor is responsible for:**

- Ensuring that the school has a clear and consistent message and approach to bullying, across the school community, and embedded within the school's vision and values;
- Evaluating and reviewing this policy to ensure that it is not discriminatory;
- The overall implementation of this policy;
- Ensuring that the school adopts a tolerant and open-minded policy towards difference;
- Ensuring the school is inclusive;
- Analysing any bullying data to establish patterns and reviewing this policy in light of these.
- Ensuring effective oversight of bullying data and processes as required by ISSR Wales.
- Scrutinising termly safeguarding and anti-bullying reports from the Headteacher.
- Ensuring policies comply with all Welsh legislation and CIW expectations.

### **The Headteacher is responsible for:**

- Ensuring that the school has a clear and consistent message and approach to bullying, across the school community, and embedded within the school's vision and values;
- Ensuring that all staff, learners and stakeholders are fully conversant with the school's approach to bullying, and that said approach becomes embedded in practice. Ensuring that implementation of this policy is consistently evident in practice across all facets of the school community;
- Reviewing and amending this policy, accounting for new legislation and government guidance, and using experience of dealing with bullying incidents in previous years to improve procedures;
- Keeping a record of any bullying incident, using Behaviourwatch, and logged as a welfare concern in the Safeguarding file of each individual learner concerned (those presenting the behaviour, and those targeted by it) to allow for proper analysis of the data collected;
- Informing those with parental responsibility, and, where relevant, external stakeholders with a duty of care, by email about any learners involved in or targeted by bullying behaviour;
- Engaging with learners and those with parental responsibility around this policy, and ensuring that their views are listened to and included in policy and practice development where appropriate;

- Analysing the data in the bullying record at termly intervals to identify trends, so that appropriate measures to tackle them can be implemented;
- Arranging appropriate and regular training for all staff members.
- Ensuring the policy is implemented in line with the Independent School Standards (Wales) Regulations 2024.
- Ensuring data from BehaviourWatch is analysed termly and forms part of the School Self-Evaluation (SEF) and School Development Plan (SDP).
- Ensuring learner voice meaningfully informs anti-bullying practice.

#### **All staff are responsible for:**

- Upholding the school's vision and values, including the school's approach to tackling bullying;
- Being alert to social dynamics of the learner groups they work with;
- Being available for learners who wish to report bullying;
- Providing follow-up support after bullying incidents;
- Being alert to possible bullying situations, particularly exclusion from friendship groups, and that they inform the relevant staff of such observations;
- Deal fairly with any bullying incident without prejudice or stereotyping;
- Understanding the composition of learner groups, showing sensitivity to those who have been the victims of bullying;
- Reporting any instances of bullying using [e.g. *Behaviourwatch*];
- Role-modelling their own appropriate behaviours when engaged with any other party on school business.

#### **Parents are responsible for:**

- Informing the Headteacher if they have any concerns about bullying behaviour in school;
- Being watchful of their child's behaviour, attitude and characteristics and informing the relevant staff members of any changes;
- Engaging in opportunities to discuss and develop the school's approach to tackling bullying, as offered by the school.

#### **Learners are responsible for:**

- Upholding the school's vision and values, including the school's approach to tackling bullying;
- Their own behaviour: the reaction of bystanders can be pivotal as to whether bullying flourishes or is stamped out;
- Informing a member of staff if they witness bullying or are a victim of bullying;
- Not making counter-threats if they are victims of bullying;
- Walking away from dangerous situations and avoiding involving other learners in incidents.

#### **Learner Voice Responsibilities**

Learners contribute to the evaluation of anti-bullying procedures through School Council meetings, learner surveys, restorative discussions, and direct consultation with SLT. Their feedback shapes policy updates and preventative strategies.

## Responding to bullying

1. Staff will record the bullying incident centrally on Behaviourwatch.
2. The Headteacher will monitor incident reporting on Behaviourwatch.
3. If an incident does occur the designated school staff will produce a report summarising the information which the Headteacher will report to the proprietor representative.
4. Support will be offered to the victim of the bullying from staff within the school setting.
5. Staff will proactively respond to the bully who may require support from the therapeutic services on offer.
6. Staff will assess whether parents and carers need to be involved.
7. Staff will assess whether any other authorities (such as police or local authority) need to be involved, particularly when actions take place outside of school.

All responses must follow the Newport City Council escalation pathway for bullying incidents, including immediate contact with the local authority where prejudice-based incidents occur.

All incidents are mapped for patterns, including repeater victims, peer groups, times of day, and locations, and reviewed at weekly safeguarding meetings.

## Bullying outside school

At Greenfields School we do not tolerate injustice and bullying whether it takes place within the school gates or beyond. The nature of cyber bullying in particular means that it can impact on learners beyond the school day. Incidents in the local community can also have an impact on school life when they involve members of the school community. Staff, parents, carers, and learners must be vigilant to bullying outside school and report and respond according to their responsibilities outlined in this policy. The school is active in addressing responsible and respectful use of social media. The school is active in supporting parents and carers to take responsibility for their child's respectful use of social media especially as technology is constantly changing. The Headteacher will assess whether any other authorities (such as police or local authority) need to be involved. Staff are trained in recognising community-based harm, including county lines, online exploitation, and neighbourhood anti-social behaviour. Incidents involving Newport community spaces are escalated appropriately to local authority safeguarding teams.

## Derogatory language

Derogatory or offensive language is not acceptable and will not be tolerated in the school. This type of language can take any of the forms of bullying listed in our definition of bullying. It will be challenged by staff, recorded and monitored [on Behaviourwatch], and followed up with any appropriate actions. This is applicable to both staff and learners alike. Staff should also record the casual use of derogatory language [e.g. Behaviourwatch].

## Prejudice-based incidents

Prejudice-based bullying is when bullying behaviour is motivated by prejudice about an individual's actual or perceived identity. This may relate to one or more of the **protected characteristics** under the **Equality Act 2010**. These are:

- race,
- gender
- sexual orientation
- age
- disability
- gender reassignment
- marriage/ civil partnership
- pregnancy/ maternity
- religion/ belief

It can be targeted towards an individual or group of people and have a significant impact on those targeted. All prejudice-based incidents are taken seriously and investigated to see whether bullying has occurred. The Headteacher regularly reports incidents to the proprietor representative. There are many examples of prejudice-related behaviour. Some of these might include:

- Stigmatising a learner with a disability or ALN;
- Using homophobic, biphobic, transphobic, sexist or racist language;
- Actively trying to remove any religious clothing such as a hijab, kippah, turban, cap or veil;
- Using sexist comments, unwanted touching or the taking of images without permission;
- Commenting on someone's appearance such as their weight or hair colour.

All prejudice-based incidents are reported termly to the Proprietor and follow Newport LA procedures for data submission.

### **Allegations of abuse made against other learners (Peer-on-Peer Abuse)**

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for learners. Peer-on-peer sexual abuse is sexual abuse that happens between children of a similar age or stage of development. It can happen between any number of children, and can affect any age group as defined in the Wales Safeguarding Procedures (2019) and Keeping Learners Safe (2022). It can be harmful to the children who display it as well as those who experience it. Children can experience peer-on-peer sexual abuse in a wide range of settings, including:

- at school
- at home or in someone else's home
- in public spaces
- online

We also recognise the gendered nature of peer-on-peer abuse. However, all peer-on-peer abuse is unacceptable and will be taken seriously. Most cases of learners hurting other learners will be dealt with

under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence;
- Could put learners in the school at risk;
- Is violent, including sexual violence;
- Involves learners being forced to use drugs or alcohol;
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes).

All staff should be aware that children can abuse other children (often referred to as peer on peer abuse). This is most likely to include, but may not be limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- sexting (also known as youth produced sexual imagery);
- initiation/hazing type violence and rituals.

### **Sexual violence and sexual harassment between children in schools and colleges**

Sexual abuse/sexual behaviours can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with ALN and LGBT children are at greater risk.

#### **Staff should be aware of the importance of:**

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and

- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

## Sexual violence

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below:

- **Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents;
- **Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents;
- **Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

## What is consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. A child under the age of 13 years does not have the legal capacity to consent to any form of sexual activity (Sexual Offences Act, 2003, S.8).

## Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

## Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual

- violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature;
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
    - non-consensual sharing of sexual images and videos;
    - sexualised online bullying;
    - unwanted sexual comments and messages, including, on social media;
    - sexual exploitation; coercion and threats; and
    - upskirting.

## Upskirting

'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

## The response to a report of sexual violence or sexual harassment

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. If staff have a concern about a child or a child makes a report to them, they should follow the School's Safeguarding and Child Protection policy. As is always the case, if staff are in any doubt as to what to do they should speak to the Designated Safeguarding Person (or a deputy).

## Sexting – sharing of nudes and semi-nude images

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSP immediately. You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a learner to share or download it (if you have already viewed the imagery by accident, you must report this to the DSP);
- Delete the imagery or ask the learner to delete it;
- Ask the learner(s) who are involved in the incident to disclose information regarding the imagery (this is the DSP's responsibility);
- Share information about the incident with other members of staff, the learner(s) it involves or their, or other, parents and/or carers;
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the learner(s) that they will receive support and help from the DSP.

## Procedures for dealing with allegations of peer-on-peer abuse:

If a learner makes an allegation of abuse against another learner:

- You must record the allegation and tell the DSP, but do not investigate it;
- The DSP will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence;
- The DSP will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed;
- The DSP will contact the children and adolescent mental health services (CAMHS), if appropriate.

### **Creating a supportive environment in school and minimising peer-on-peer abuse**

We recognise the importance of taking proactive action to minimise the risk of peer-on-peer abuse, and of creating a supportive environment where victims feel confident in reporting incidents. To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female learners, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate learners about appropriate behaviour and consent
- Ensure learners are able to easily and confidently report abuse using our reporting systems
- Ensure staff reassure victims that they are being taken seriously
- Ensure staff are trained to understand:
  - How to recognise the indicators and signs of peer-on-peer abuse, and know how to identify it and respond to reports;
  - That even if there are no reports of peer-on-peer abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”;
  - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to;
    - A friend may make a report;
    - A member of staff may overhear a conversation;
    - A child's behaviour might indicate that something is wrong.
  - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation;
  - That a learner harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy;
  - The important role they have to play in preventing peer-on-peer abuse and responding where they believe a child may be at risk from it;
  - That they should speak to the DSP if they have any concerns.

## Initial review meeting

Following a report of an incident, the DSP will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to learner(s);
- If a referral needs to be made to the police and/or children's social care;
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed);
- What further information is required to decide on the best response;
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown);
- Whether immediate action should be taken to delete or remove images or videos from devices or online services;
- Any relevant facts about the learners involved which would influence risk assessment;
- If there is a need to contact another school, college, setting or individual;
- Whether to contact parents or carers of the learners involved (in most cases parents/carers should be involved).

### The DSP will make an immediate referral to police and/or children's social care if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSP knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any learner in the images or videos is under 13
- The DSP has reason to believe a learner is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming).

If none of the above apply then the DSP, in consultation with the Headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

### Further review by the DSP

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSP will conduct a further review to establish the facts and assess the risks. They will hold interviews with the learners involved (if appropriate). If at any point in the process there is a concern that a learner has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

## Informing parents

The DSP will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the learner at risk of harm.

## Referring to the police

If it is necessary to refer an incident to the police, this will be done through by dialing 101. Staff follow Welsh Government guidance on 'Safeguarding children in a digital world', supported by Hwb online safety materials.

## Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded.

### Please also refer to Greenfields School Safeguarding Policy

Learners are taught about the issues surrounding the sharing of nudes and semi-nudes as part of PSE sessions, which covers the following in relation to the sharing of nudes and semi-nudes:

- What it is;
- How it is most likely to be encountered;
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment;
- Issues of legality;
- The risk of damage to people's feelings and reputation;
- Specific requests or pressure to provide (or forward) such images;
- The receipt of such images.

## Cyberbullying

The rapid development of, and widespread access to, technology has provided a new medium for 'virtual' bullying, which can occur in or outside school. Cyber-bullying is a different form of bullying and can happen at all times of the day with a potentially bigger audience and more accessories as people forward on content at a click. The following link provides additional information and guidance for school to follow:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/623895/Preventing\\_and\\_tackling\\_bullying\\_advice.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/623895/Preventing_and_tackling_bullying_advice.pdf)

It is the schools responsibility to ensure that when an electronic device, such as a mobile phone, has been seized by a member of staff who has been formally authorised by the headteacher, that staff member can examine data or files, and delete these, where there is good reason to do so. This power

applies to all schools and there is no need to have parental consent to search through a young person's mobile phone.

If an electronic device that is prohibited by the school rules has been seized and the member of staff has reasonable ground to suspect that it contains evidence in relation to an offence, they must give the device to the police as soon as it is reasonably practicable. Material on the device that is suspected to be evidence relevant to an offence, or that is a pornographic image of a child or an extreme pornographic image, **should not be deleted prior to giving the device to the police**. If a staff member finds material that they do not suspect contains evidence in relation to an offence, they can decide whether it is appropriate to delete or retain the material as evidence of a breach of school discipline.

### Online bullying behaviour can take different forms including:

- **Profile:** people do not have to be physically stronger, older, or more popular than the person they are bullying online;
- **Location:** online bullying is not confined to a physical location and it can take place at any time. Incidents can take place in a learner's own home, intruding into spaces previously regarded as safe and private;
- **Audience:** online content can be hard to remove and can be recirculated and reposted. The potential numbers of people who can see content posted online is very large. Single incidents of online abuse can quickly escalate into bullying, e.g. by reposting, sharing and through comments;
- **Anonymity:** the person being targeted by bullying may not necessarily know the identity of the perpetrator(s) of the bullying behaviour. The target also will not know who has seen the abusive content. If the perpetrator actively hides their identity from the target this may be considered a form of passive aggression and, if repeated, this could constitute bullying;
- **Motivation:** online bullying is typically carried out on purpose. However, initial incidents may have unintended consequences, and can escalate through the involvement of others. An individual may not feel that by endorsing or reposting someone else's post that they are actively participating in bullying. The instigator may not have intended an offensive or hurtful comment to be repeated. A single incident – one upsetting post or message – may escalate into bullying involving a number of people over time.

## School strategies to prevent and tackle bullying

### Preventative measures

We recognise that our learners are especially vulnerable to being bullied and to exhibiting bullying behaviour themselves. Many have witnessed or experienced bullying or abuse previously; many have mental health issues at times as a result of their experiences; they may feel powerless in relation to their current situation; they may have low self-esteem; they may have poor social skills and be anxious about fitting in with their peers; they may be looking to impress other learners or to divert negative attention away from themselves to others. Many of our learners are all in care and living away from their families and home towns. Learners with ALN are three times more likely to experience bullying than their peers. These are all risk factors that can determine whether a child may present bullying behaviours towards

others. We recognise that we are likely to demonstrate bullying behaviour in our school at times. Our learners are supervised closely at all times and will never be left alone with another young person without an adult present.

The Anti-Bullying curriculum is delivered through Health & Wellbeing AoLE, Relationships and Sexuality Education (RSE), and digital competency sessions.

Learner voice and rights (UNCRC Articles 12, 19, 28, 29) shape our preventative work.

### **Company expectations of the school are such that we expect schools to:**

- Have a strong moral leadership from the Headteacher, other senior leaders and the proprietor representative, which models values and high expectations, thereby 'leading by example' by valuing health and well-being;
- Embed a climate and culture where learners feel safe, secure and valued, promote the UNCRC and, in particular, seek and listen to the voice of the child or young person;
- Have in place a secure understanding of the health and well-being of their learners and effective methods to monitor and evaluate this;
- Provide a curriculum that meets the needs of learners (both now and for their future), implemented with learning experiences that support and challenge learners about their health and well-being;
- Establish and maintain a strong and responsive approach to care, support and guidance for all learners;
- Create an environment that promotes health and well-being (e.g. space to play and relax maximising the benefits of outdoor learning where possible, suitable toilet facilities, support healthy food and drink, ensure site security, etc.);
- Ensure effective communication and partnership working with parents/carers and multi-agency stakeholders;
- Support professional learning for all staff, tailored to meet their needs and responsibilities.

### **We use a range of measures to prevent and tackle bullying including:**

Our school vision is at the heart of everything we do and ensures that all members of the school community are revered and respected as members of a community.

- We clearly communicate our whole-school commitment to address bullying;
- All reported or investigated instances of bullying will be investigated by a member of staff;
- Through the curriculum, we encourage learner cooperation and the development of interpersonal skills using group and pair work. Anti-Bullying work is carried out as part of PSE;
- Diversity, difference and respect for others is promoted and celebrated within lessons and beyond. Stereotypes and derogatory language is always challenged by staff at our school. Our learners are explicitly taught about the protected characteristics under the Equality Act 2010. Our PSE curriculum includes specific teaching about healthy relationships, recognising and responding to unhealthy relationships and bullying;
- Seating plans will be organised and altered to prevent instances of bullying.
- Potential victims of bullying are placed in working groups with learners who do not abuse or take advantage of others;

- Opportunities to extend friendship groups and interactive skills are provided through participation in whole school activities, e.g. Enrichment, PE and Friday Activities;
- All members of the school are made aware of this policy and their responsibilities in relation to it. We use a learner-friendly information to ensure that all learners understand what bullying is and know how to report it;
- Learners are continually involved in developing school-wide anti-bullying initiatives through consultation with the Headteacher;
- All staff members receive training on identifying and dealing with the different types of bullying
- Safe Places, supervised by staff, are available for learners to go to during free time if they feel threatened or wish to be alone.
- Before new learners join the school, the Headteacher and the DSP will consider how to prevent bullying from happening – this may include giving the learner a buddy to help integrate them into the school;
- The school will be alert to, and address, any mental health and wellbeing issues amongst learners, as these can be a cause of bullying behaviour. The school will ensure potential perpetrators are given support as required, so their educational, emotional and social development isn't negatively influenced by outside factors, e.g. mental health issues.

### **How learners can raise concerns**

We provide a range of opportunities for learners to raise concerns and be listened to. These include:

- The Headteacher and Senior Leadership;
- School staff team, with whom pupils have built an effective relationship;
- Residential care staff and management, particularly keyworkers;
- National Helplines;
- Local Authority representatives, including social worker, IRO and virtual school;
- Parents;
- School group meetings and tutor times;
- The company complaints system.

Learners are given multiple reporting avenues, including anonymous options, drop-in wellbeing sessions, and reflection sessions at the end of the day.

### **Responding to bullying**

- Learners are taught how to raise concerns and how these will be handled – this includes reporting concerns about others;
- Staff will never tolerate abuse as “banter” or “part of growing up”;
- Staff will treat reports of bullying seriously and never ignore signs of suspected bullying;
- Unpleasantness from one learner towards another is always challenged and never ignored;
- All staff act immediately when they become aware of a bullying incident;

- The first response to an incident of bullying should always be to: assess the ongoing situation and take steps to deescalate it; ensure the immediate safety and welfare of the young people involved; and reduce the chance of further incidents occurring whilst the investigation is taking place;
- If a member of staff believes a learner is in danger of immediate harm, they will inform the DSP without delay. The DSP will follow the Safeguarding Policy to keep all children safe from harm;
- Every incidents of bullying reported to the school is recorded and investigated;
- The Headteacher will decide who is best placed to investigate a report of bullying. This will usually be the tutor. Following the investigation, this member of staff will discuss their findings with the Headteacher and other relevant staff to consider what consequences and follow up action to take. The member of staff will record the incident and outcome on our online BehaviourWatch system, referring the incident to the Headteacher who will ensure a record is kept in the Safeguarding files of all of the learners concerned;
- The Headteacher will always take the individual needs of the learners concerned into consideration, in line with the principles of inclusion;
- A person who has been bullied does not feel in control of their life and may not feel free to exercise choice. By supporting children and young people to make choices, this helps restore their sense of agency; develop their resilience; and establish positive relationship approaches that they will need for the rest of their lives. These choices might concern what consequences follow on from the incident, and whether or not a restorative approach will work.

There are a variety of intervention methods schools may choose to use. Examples of these include:

- mediation – this involves helping the perpetrator and target of bullying talk about the issue and agree on a solution;
- restorative approaches – built on values, which separate the person from the behaviour. They promote accountability and seek to repair any harm caused in a situation;
- building resilience – strengthening the learner’s ability to effectively cope, adjust or recover from being bullied or facing other sources of trauma, stress or adversity; equipping learners with a solid foundation or emotional resilience by ensuring that they feel accepted;
- peer support – is about children and young people feeling accepted and included by other learners. It can help individuals feel like they belong in a school and can be an important factor in reducing bullying and conflict. It can be encouraged in schools in both informal and formal ways;
- school sanctions – schools can use disciplinary sanctions, as set out in their school policies, to address bullying. The consequences of bullying reflect the seriousness of the incident so that others see that bullying is unacceptable.

### **Investigating a bullying incident**

- If a learner is injured, member of staff takes immediate action with regards to first aid and assessment of their injuries;
- All those involved including witnesses will be interviewed separately in a suitably private room;

- Members of staff ensure that there is no possibility of contact between the learners being interviewed during this process;
- If appropriate, the alleged perpetrator, the victim and witnesses, will be asked to write down details of the incident; this may need prompting with questions from the member of staff to obtain the full picture;
- Do not make premature assumptions: be non-judgemental at this stage. Members of staff listen carefully to all accounts, are non-confrontational and do not attach blame until the investigation is complete;
- Use language carefully: separate the behaviour from the person;
- All learners involved are informed that they must not discuss the interview with other learners;
- Due to the potential for sexist, transphobic, sexual bullying to be characterised by inappropriate sexual behaviour, staff members involved in dealing with the incident are required to consider whether there is a need for safeguarding processes to be implemented.

## Consequences

- If the Headteacher is satisfied that bullying did take place, a plan will be drawn up to help the perpetrator understand the consequences of their actions. They will be warned that there must be no further incidents;
- The Headteacher informs the learner of the sanction to be used in this instance and future sanctions if the bullying behaviour continues;
- A Restorative Meeting may be held to attempt reconciliation and to obtain a genuine apology from the perpetrator. This will either be in writing to the victim (and/or witnesses if appropriate), or face-to-face, but only with the victim's full consent. Discretion is used: victims will never feel pressured into a face-to-face meeting with the perpetrator;
- Both the perpetrator and victim will have regular 1:1 meetings with their tutors to discuss the ongoing situation. The aim is to help the perpetrator recognise the consequences of their behaviour on others, and to consider the choices they have regarding the way they treat people;
- Those with parental responsibility and Social Workers for both young people will be informed of bullying incidents and the action taken. A meeting of the multi-agency team may be required involving Therapy and Carers;
- Therapists, where assigned, for all young people involved will be informed and may carry out relevant work as part of their sessions;
- Sometimes, bullying behaviour may continue in spite of intervention from staff and it is felt that it is causing serious harm, or put others at significant risk of harm. In this case an exclusion may be necessary;
- In serious circumstances if the bullying takes the form of criminal activity it will also be appropriate to involve the Police: this decision will be made on a case by case basis.
- Restorative approaches are used whenever appropriate, in line with Welsh Government's whole-school approach to emotional and mental wellbeing

## Support

- For at least month after the initial incident of bullying, the Headteacher will hold regular informal 1:1 discussion with the learners involved to check whether the bullying has stopped.

- All staff will monitor the situation and will challenge bullying behaviour - reporting and recording any incidents as before.
- Support may also include trauma-informed regulation strategies, sensory breaks, and therapeutic interventions delivered by school-based wellbeing practitioners

#### **Learners who have been bullied are supported in the following ways:**

- Being listened to;
- Having an immediate opportunity to meet with their tutor or a member of staff of their choice;
- Being reassured;
- Being offered continued support;
- Being offered counselling, where appropriate.

#### **Learners who have bullied others are supported in the following ways:**

- Identify the feelings that caused them to act this way;
- Develop alternative ways of responding to these feelings;
- Understand the impact of their behaviour on other people;
- Repair relationships;
- Receive a logical consequence for their actions;
- Being able to discuss what happened;
- Being helped to reflect on why they became involved;
- Being helped to understand what they did wrong and why they need to change their behaviour;
- Appropriate assistance from the Care Team, if residential, or those with parental responsibility.

#### **Reporting and recording incidents of bullying:**

- The children and young people involved, as well as staff or other adults;
- Where and when bullying took place;
- The type of bullying experienced, e.g. name-calling, rumours, threats etc;
- Any underlying prejudice including details of any protected characteristic(s);
- Consideration of personal or additional support needs and wellbeing concerns;
- Actions taken including resolution at an individual or organisational level.
- Incidents are categorised on BehaviourWatch according to type (cyberbullying, prejudice-based, physical, relational), and termly reports are provided to the Proprietor and Local Authority where required.

Under the Children Act 1989 a bullying incident should be addressed as a child protection concern when there is *'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm'*. Where this is the case, the School will report their concerns to their local authority safeguarding officer, and the placing authority for the child in question, and will follow the School's **Safeguarding and Child Protection Policy and Procedures**.

For incidents of harmful behaviours between learners (including sexting, CSE and sexual harassment) the school will follow the **Safeguarding and Child Protection Policy and Procedures**, responding to incidents, and safeguarding young people to assess the risk and to determine the most appropriate course of action.

### **Bullying between staff members**

Incidents of bullying reported to the School by an employee suffering bullying by another employee will be treated as a grievance, and is recorded, reported and followed through using the **Grievance and Disciplinary Policy and Procedures**.

### **Training**

The Headteacher is responsible for ensuring that all school staff and adults working in school receive training on the vision and values of the school and on this anti-bullying policy. Staff complete training to enhance their knowledge of bullying, how to identify when someone is being bullied, how to support them and reporting incidents.

### **Related policies**

- Safeguarding policy
- Admissions policy
- Attendance policy
- Safer Recruitment policy
- Curriculum policy
- Behaviour management policy
- Health and Safety policy
- Risk Assessments policy
- Online Safety policy
- Complaints policy
- Additional Learning Needs policy

### **Monitoring and review**

The Headteacher is responsible for ensuring that the vision and values of the school are rigorously applied to the anti-bullying work in the school and in reporting termly to the proprietor representative (and the local authority where applicable) on how the policy is being enforced and upheld. The proprietors are, in turn, responsible for supporting the vision and values and evaluating the effectiveness of the policy via the termly report and by in-school monitoring.

The policy and procedures are reviewed and updated on an annual basis, to ensure continued compliance with the Independent School Standards (Wales) Regulations 2024, and relevant guidance issued by the Welsh Government. This policy is evaluated as part of the school's Self-Evaluation (SEF)

under IA4 (Care, Support & Guidance) and IA2 (Wellbeing). Evidence from this policy feeds into the School Development Plan (SDP) and is reviewed annually with meaningful participation from learners, parents and staff.

**This document will be next reviewed by 1<sup>st</sup> September 2026**

## Resources

### Welsh Government Leaflet for Children:

- [leaflet-are-you-being-bullied.pdf](#)

### Welsh Government Posters for School/Children:

- [poster-if-you-need-help-dealing-with-bullying.pdf](#)
- [poster-if-you-are-being-bullied.pdf](#)

### Children's Guide Challenging Bullying: rights, respect, equality:

- [rights-respect-equality-guide-for-children.pdf](#)

### Hwb Resource: Challenging Bullying:

- [View - Hwb](#)

### Where to find further help & advice:

**Bullies Out** – Anti-bullying charity based in Wales that works with individuals, schools, colleges, youth and community settings. E-mentors offer online support (e-mail [mentorsonline@bulliesout.com](mailto:mentorsonline@bulliesout.com)).  
[www.bulliesout.com](http://www.bulliesout.com)  
e-mail: [mail@bulliesout.com](mailto:mail@bulliesout.com)

**Anti-Bullying Alliance** – Information for schools, parents/carers and children and young people on all aspects of bullying.  
[www.anti-bullyingalliance.org.uk](http://www.anti-bullyingalliance.org.uk)

**Kidscape** – Anti-bullying charity that runs workshops for children and young people who have been bullied.  
[www.kidscape.org.uk](http://www.kidscape.org.uk)

**The Diana Award** – Trains young anti-bullying ambassadors to help others.  
[www.antibullyingpro.com](http://www.antibullyingpro.com)

**Meic** – Information advice and advocacy for young people.  
[www.meiccymru.org](http://www.meiccymru.org)

**Childline** – Provide counselling for anyone aged under 19 in the UK.  
[www.childline.org.uk](http://www.childline.org.uk)  
Tel: 0800 1111

<b>Headteacher:</b>	Creslyn Singh	<b>Date:</b>	22 <sup>nd</sup> October 2025
<b>Proprietor:</b>	Rob McConomy	<b>Date:</b>	22 <sup>nd</sup> October 2025