



Anti-bullying Policy

POLICY STATEMENT

Clifton College does not tolerate any form of bullying against pupils or staff. We believe that everyone has the right to live and work at Clifton without fear of harassment and intimidation by other individuals or groups and we aim to provide an environment in which staff and pupils feel happy and safe. We celebrate individual differences and aim to develop each person's talents and abilities.

SCOPE

This is a cross-College policy for pupils. The whole College community is made aware of ways of reporting incidents of bullying.

AIMS AND OBJECTIVES

The aim of this policy is:

- To create and maintain an atmosphere of tolerance, co-operation and mutual respect in which bullying is seen to be unacceptable
- To be vigilant and to deal with incidents appropriately and swiftly
- To protect and safeguard pupils in their use of ICT and e-technology
- To raise awareness of and counter instances of cyberbullying
- To support all parties who are involved in bullying incidents
- To have strategies to deal with bullying as it occurs
- To provide time for reflection and discussion of the policy and offer INSET when needed

LEGISLATION AND GUIDANCE

- Preventing and Tackling Bullying Advice for Headteachers, Staff and Governing Bodies (July 2017)
- Keeping Children Safe in Education (DfE, September 2019)
- The Equality Act 2010
- Guidance for safer working practice for those working with children and young people in education settings (Safer Recruitment Consortium, May 2019)
- Sexual violence and sexual harassment between children in schools and colleges (DfE, May 2018)
- Sexting in schools and colleges (UK Council for Child Internet Safety, January 2017)
- Police action in response to youth produced sexual imagery ('Sexting') (College of Policing, November 2016)
- What to do if you're worried that a child is being abused (March 2015)

ROLES AND RESPONSIBILITIES

Housemasters and Housemistresses (HoMs)/member of staff who has the trust of the pupil (Pre-Prep) will:



- Initiate and undertake investigations
- Keep a written record of individuals consulted and actions taken
- Take written statements from those involved
- Report incidents on CPOMS
- Inform parents of any proposed disciplinary action
- Following up incidents and communication with staff, pupils and parents as necessary

The Deputy Head (Pastoral) will:

- Assist the HoM with the investigation and following up incidents where required
- Liaise with other HoMs, the Deputy Heads (Academic), Heads and other agencies as necessary

Other staff members are responsible for:

- Role modelling good behaviour
- Supporting anti-bullying strategies and initiatives
- Assisting with investigations and following up incidents as necessary

Pupils are responsible for:

- Reporting incidents to their HoM or other member of staff

The Head of the Pre-Prep has particular responsibility for children in the Early Years Foundation Stage.

LINKS WITH THE CURRICULUM

The promotion of the values of tolerance and teamwork permeate every aspect of education at Clifton. More specifically, pupils have a chance to discuss bullying as part of the PSHE programme of study.

RELATED POLICIES AND DOCUMENTS

- Rewards and Sanctions Policy
- School Rules
- Pupil Mobile Phone Policy
- E-Safety Policy
- Electronic Device Acceptable Use Agreement
- Safeguarding and Protecting Children Policy
- Searching and Confiscation Policy and Guidance

DISSEMINATION AND IMPLEMENTATION

All members of the teaching staff share a responsibility for the implementation of the College's Anti-bullying Policy. Behaviour expectations are made clear to pupils through School Rules and a copy of the policy is published on the College website.

MONITOR AND REVIEW



This policy is regularly monitored to ensure that it is working as effectively as possible. It will be reviewed annually and at other times in the intervening period as necessary.

Anti-bullying Procedures

WHAT IS BULLYING?

“Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages, social media or gaming, which can include the use of images and video) and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, special educational needs or disabilities, or because a child is adopted, in care or has caring responsibilities. It might be motivated by actual differences between children, or perceived differences.” - DfE Preventing and tackling bullying (July 2017)

Ofsted defines bullying as “aggressive or insulting behaviour by an individual or group, often repeated over time, that intentionally hurts or harms.” Perpetrators and victims may include adults as well as children. Bullying may take a number of different forms, the principal ones being verbal and cyber bullying, physical and manipulative. Perception of the situation by the victim may be distorted, but the experience is very painful and difficult to defend against.

Bullying often focuses on individual differences. In this respect it undermines the College’s work in promoting tolerance and understanding in the community. Bullying may seize upon aspects of physical shape or appearance, or focus on parental, cultural or ethnically-based lifestyles. It may dwell upon race, religion or nationality. Sexual bullying may involve misogyny or homophobia, or focus on alleged sexual attractiveness or lack of it.

Research suggests that a large number of incidents of intimidating behaviour such as name-calling or “dirty looks” actually take place in classrooms when the teacher is present. This emphasises the need for constant awareness and vigilance by staff.

Signs of bullying may include changes in behaviour such as: becoming shy and nervous, taking unusual absences or clinging to adults, anxiousness about coming to school or fear of lessons; a request to change study, dormitory or class; deterioration of academic work; books, clothes or other possessions missing, damaged or destroyed, unexplained physical injuries; sitting or eating alone; being late for school; a refusal to say what is wrong.

Cyberbullying is a 'method' of bullying, rather than a 'type' of bullying. It includes bullying via text message, via instant-messenger services and social networking sites, via email, and via images or videos posted on the Internet or spread via mobile phone. It can take the form of any of the previously discussed types of bullying, i.e. technology can be used to bully for reasons of race, religion, sexuality, disability, etc.

Verbal and **cyberbullying** may involve name calling or “banter”, make use of written notes, e-mails, mobile telephone messages or postings on social networking websites and may include threats of physical violence.



Physical bullying often consists of deliberate jostling, bumping, pushing or shoving. Those responsible often maintain that it is accidental when it first comes to light. It is a criminal offence where it involves assault, actual bodily harm, or wounding. It may involve theft or damage to property, accompanied by the threat of violence or by the abuse of power.

Manipulative bullying manipulates social networks with the intention of insulting, excluding, ostracising or marginalising individuals from their friends and normal relationships. It may involve the spreading of rumours or malicious accusations.

In accordance with the College's Code of Conduct for Staff who Work with Children and Young People, members of staff are asked to set an example of respect, kindness and courtesy, to ensure that proper discipline is maintained and to help to monitor all areas of the school. Staff should be vigilant about the location and the geography of bullying and aim to promote an open and honest anti-bullying ethos across the school at all times. Reported incidents should be dealt with promptly, with relevant staff being informed, as applicable. We ask parents to support this policy and to assist by reporting incidents or bringing their concerns to us at an early stage.

Peer on Peer Abuse (Including Sexual Violence and Sexual Harassment between children)

The conduct of pupils towards each other will, in most instances, be covered by the College's Behaviour Policies. However, some behaviour by a pupil towards another may be of such a nature that safeguarding concerns are raised.

Peer on peer abuse rarely takes place in isolation and can often indicate wider safeguarding concerns that are linked to other things that are happening in a child's life and/or the spaces in which they spend their time. This is known as contextual safeguarding, which simply means that assessments of children should consider whether wider environmental factors are present in a child's life that may be a threat to their safety and/or welfare. All staff, but especially the DSL (or Deputy DSL) should be considering the context within which such incidents and/or behaviours occur. Research has also shown that many children who present with harmful behaviour towards others, in the context of peer on peer abuse, are themselves vulnerable and may have been victimised by peers, parents or adults in the community prior to their abuse of peers. Children's social care should be informed of all such information to allow any assessment process to consider all available evidence and the full context of any abuse.

Peer on peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate). Peer on peer abuse can take various forms, including (but not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

References to sexual violence are references to sexual offences under the Sexual Offences



Act 2003, specifically rape, assault by penetration and sexual assault. References to sexual harassment mean "unwanted conduct of a sexual nature" that can occur online and offline. In the context of child on child sexual harassment, it 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.

Harmful sexual behaviour is an umbrella term that includes sexual violence and sexual harassment. The College recognises that problematic, abusive and violent sexual behaviours are inappropriate and may cause developmental damage. Harmful sexual behaviour can occur online and offline (both physical and verbal) and the College recognises the gendered nature such behaviour can take. Harmful sexual behaviour, like all peer on peer abuse, is never acceptable and will be taken seriously.

The DfE guidance *Sexual violence and sexual harassment between children in schools and colleges* (May 2018) provides further detailed advice.

Clifton College takes allegations of peer on peer abuse very seriously; abuse in all situations is unacceptable and should never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". Behaviour such as initiation violence or any form of sexual violence or sexual harassment is not acceptable.

Sexual violence and sexual harassment 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. All incidents will be taken seriously by the College and those affected will be offered appropriate support. Staff should be aware that some groups of individuals are potentially more at risk of peer on peer sexual violence – for example evidence shows that girls, children with SEND and LGBT+ children are at greater risk.

All staff should be alert to the well-being of pupils and to signs of abuse, and should engage with these signs, as appropriate, to determine whether they are caused by peer on peer abuse. Signs that a child may be suffering from peer on peer abuse can also overlap with those indicating other types of abuse (see the College's Safeguarding and Protecting Children Policy for further details on the indicators of abuse). Any child can be vulnerable to peer on peer abuse due to the strength of peer influence during adolescence.

PREVENTION

Listening: There are many opportunities for Clifton pupils to be heard. The "Who Can I talk to?" poster, which is displayed around school buildings and in Houses, provides all students with clear guidance on where to seek support.



Feedback: Periodically, from Year 4 onwards, we receive pupils' feedback via a confidential questionnaire. Notices in Houses and at the back of the Calendar remind pupils to whom they might talk (or write) if they feel unhappy or anxious.

Counselling: Counselling can play an important part in supporting both the victim and the perpetrator of bullying. The College uses the services of three trained counsellors: Mrs Tracey Richardson (in the Upper School), and Miss Laura Denmead (in the Preparatory School), who are independent.

Education: Use of curriculum opportunities, such as the College's PSHE programme, to discuss issues related to Human Rights, moral responsibility and for drawing out anti-bullying messages. Weekly assemblies, Chapel addresses and tutor/mentor groups provide further reinforcement and opportunities for discussion. In addition, both the Preparatory and Upper School may deliver age-related initiatives that aim to address specific issues.

Training: Members of staff receive regular updates on Safeguarding. The Praepostors in the Upper School and Twelves in the Preparatory School also receive Safeguarding training.

Minimising the Risk of Peer on Peer Abuse

Clifton College actively seeks to raise awareness of and prevent all forms of peer on peer abuse by:

- Educating children about the nature and prevalence of peer-on-peer abuse via PSHE and the wider curriculum;
- Having robust anti-bullying procedures in place (see also the College's Safeguarding and Protecting Children Policy) and pupils are taught at all stages of the College about acceptable behaviour and how to keep themselves safe;
- Encouraging staff and volunteers that all peer on peer abuse issues are reported as safeguarding concerns in accordance with the procedures in this policy to enable the DSL to spot and address any concerning trends and identify pupils who may need additional support;
- Challenging the attitudes that underlie such abuse (both inside and outside the classroom);
- Working with members of Council, Senior Leadership Team, all staff and volunteers, pupils and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the College community;
- Creating conditions in which pupils can aspire to and realise safe and healthy relationships;
- Creating a culture in which pupils feel able to share their concerns openly, in a non-judgmental environment, and have them listened to. The Prep diary contains details of what a pupil should do if they have a complaint.
- Responding to cases of peer-on-peer abuse promptly and appropriately.

DEALING WITH INCIDENTS



The outcome that is sought is understanding and a change of behaviour. Immediate action will be taken where there is clear evidence that bullying has taken place; sanctions may or may not be appropriate, depending on the circumstances.

Investigation will usually start with the HoM (at Pre-Prep level it may be appropriate for a member of staff who has the trust of the child to initiate the investigation), who will talk to individuals and/or groups. Pupils will always be allowed to state their opinions and feelings.

If a search is required then the policy and guidance on searching and confiscation should be followed.

A written record is kept and written statements should be taken from those involved. These will be reported on CPOMs <https://cliftoncollege.cpoms.net> to the HoM, DSL, DDSL and other linked staff.

If there is evidence that the incident is sufficiently serious to require discipline at a School level, parents will be informed and investigation may continue with the Deputy Head (Pastoral) and HoM.

Any sanction that is applied will depend on the severity and history of the incident(s) and might involve any of the range of measures which are available.

The Deputy Head (Pastoral) will liaise with other Housemasters/mistresses (HoMs), the Deputy Heads (Academic) and Heads as necessary. Other agencies may also be contacted.

The Head of the Pre-Prep has particular responsibility for children in the Early Years Foundation Stage.

How Allegations of Peer on Peer Abuse are Recorded, Investigated and Dealt With

It is essential that all concerns/allegations of peer on peer abuse (including sexual violence or sexual harassment between children) are handled sensitively, appropriately and promptly. If a member of staff thinks, for whatever reason, that a child may be at risk of abuse by their peer(s), they should discuss their concerns with the DSL without delay so that a course of action can be agreed.

The DSL will, where necessary, take any immediate steps to ensure the safety of the child/all children affected, in line with the advice for practitioners in: *What to do if you're worried that a child is being abused* (March 2015). The DSL will use their professional judgement to determine whether it is appropriate for the alleged behaviour to be dealt with internally, or whether any external specialist support is required. In borderline cases the DSL may wish to consult with First Response and/or any other external agencies on a no-names basis to determine the most appropriate response.

Where there is an allegation or a concern of peer on peer abuse, the College will carry out a robust risk and needs assessment in respect of each child affected by the abuse. This may range from an unwritten 'dynamic' assessment to a detailed written assessment



depending on the severity of the case. Please see the College's Risk Assessment Policy for further details.

In cases where the DSL deems it appropriate to contact First Response, The DSL will discuss the allegations/concerns with First Response and agree on a course of action, which may include:

- Managing the incident internally with help from external specialists where appropriate and possible;
- Undertaking/contributing to an inter-agency early help assessment, with targeted early help services provided to address the assessed needs of a child/children and their family;
- Referring the child/children to children's social care for assessment;
- Reporting alleged criminal behaviour to the Police.

All concerns/allegations of peer on peer abuse will be assessed on a case by case basis, and in light of the wider context.

Staff involved with cases of peer on peer abuse should ensure that they keep accurate records of all related conversations, meetings, communications, discussions, decisions and outcomes on CPOMS.

BYSTANDERS

The issue of being a bystander or accessory is addressed with all pupils. Pupils are encouraged to respect one another and this includes when they are using electronic devices.

FOLLOWING UP INCIDENTS

This is likely to involve communication between staff: the Heads, Deputy Heads, HoMs and other linked staff.

It will often be appropriate to speak to the pupils involved, either individually or in groups and to bring perpetrators and victims together in an atmosphere of trust so that they can discuss their feelings openly.

Normally contact will be made by the respective HoMs with the parents/guardians of both the victim and the perpetrator.

Thereafter vigilance and monitoring will be important to ensure that there is no repetition or unpleasant consequences and that the victims feel safe.

If a pupil is found to have made a malicious allegation against a member of staff then appropriate disciplinary action will be taken in consultation with the Heads, Deputy Heads and HoMs and might involve any of a range of measures that are available.

Support for those Affected by Peer on Peer Abuse



Support for those involved in cases of peer on peer abuse will consider their age, the nature of the allegations and the risk of further abuse. The College must ensure that all those involved are safeguarded, providing pupils with education and support as necessary. The views of the child/children affected should also be taken into account.

Unless it is unsafe to do so (for example where a referral needs to be made immediately), the DSL should discuss proposed action with the child/children involved and their parents, as well as obtaining consent to any referral before it is made. The College should manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so.

If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the College will ensure that, subject to the advice of First Response, the pupil's parents are informed as soon as possible and the pupil is supported during the interview by an appropriate adult. In the case of pupils whose parents are abroad, their guardian will be requested to provide support and to accommodate the pupil should it be necessary to suspend them during the investigation.

Normally the DSL will try to discuss any concerns about a child's welfare with the family, and where possible seek their agreement to make a referral. However, in accordance with DfE guidance, this will only be done when this will not place the child at increased risk. The child's views will also be taken into account. Where there are doubts or reservations about involving the child's family, the DSL should clarify with First Response or the Police whether, and if so when and by whom, the parents should be told about the referral. This is important in cases where the Police may need to conduct a criminal investigation.

It is important for Clifton College to ensure that any pupils involved with an allegation of peer on peer abuse remain protected, especially from bullying or harassment. Clifton College will support all pupils involved in accordance with the advice of the relevant agencies.

CYBERBULLYING

Visual evidence after cyberbullying has taken place should be retained and pupils should be encouraged to pass the evidence to a member of staff or their parents. In some cases, it will be necessary to contact mobile phone companies, Internet service providers or social networking sites. Members of the IT staff can help in this regard.

The Education Act 2011 amended the power in the Education Act 1996 to provide 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 Head, 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.

The following advice should be given to those experiencing cyberbullying:



Not to retaliate or reply but retain the evidence.

To block or remove offenders from buddy lists.

To review the information given out.

To make sure to tell a trusted adult.

To keep calm and not to let the bully see a reaction.

If the person responsible for the bullying is identified, sanctions will be applied under the College's Rewards and Sanctions Policy.

The following sanctions might be implemented, depending upon the nature and severity of the bullying:

Confiscating equipment such as mobile phones.

Withdrawing access to the Internet for a set period of time.

Limiting use of the Internet for a set period of time.

Contacting the police, CEOP.

Where the cyberbullying is sufficiently severe, informing external agencies such as social networking or email member sites.

Support will be provided for the victim. This may include meeting the bully to discuss what has happened and agreeing a way forward. It is important that all children and staff recognise that when an incident of 'cyberbullying' takes place it is dealt with swiftly.

E-MAILING AND INSTANT MESSAGING

Pupils should never reply to unpleasant or unwanted emails and should not open files from people they do not know. They should also not open files which have been sent to them in error and in these circumstances they should contact their HoM, a member of the ICT Department or a member of SMT/SLT to report the incident. When writing e-mails or instant messages, pupils are taught to think carefully about the content. Pupils are taught that when angry or distressed, they might send something likely to cause further anguish; on these occasions they should leave the computer and discuss the issue with someone else.

Sexting

Staff should be aware of the dangers posed to children and young people in relation to 'sexting' and 'youth produced sexual imagery'. These terms refer to messages, photos and videos of a sexual nature created by children or young people which can be shared via mobile phones, webcams over the internet and social media.



The College treats all incidences of sexting as safeguarding matters to be actioned in accordance with this policy.

Members of staff should not view sexual imagery which is reported to them, or copy, print or share the images under any circumstances. In referring any incident of sexting, members of staff should describe the content of the images as reported to them.

Staff should report any concerns regarding sexting and youth produced sexual imagery immediately to the DSL. Staff should also be alert to the fact that children with SEN and disabilities (SEND) can face additional risks online, for example, from online bullying, grooming and radicalisation.

The DSL may in exceptional circumstances view images with the prior approval of the Head and only where:

- it is the only way to make a decision whether to involve other agencies, as there is insufficient information available as to its contents;
- it is necessary to report the image to a website or agency to have it taken down; or
- a pupil has reported the image directly to a member of staff in circumstances where viewing the image is unavoidable.

Where viewing an image is unavoidable:

- viewing should take place on School premises wherever possible;
- the image should be viewed by a person of the same sex as the person alleged to be shown in the image (where this is known);
- a senior member of staff should be present to monitor and support the person viewing the image. This member of staff should not view the image;
- full details of the viewing must be recorded in the College's safeguarding records, including who was present, the date and time, the nature of the image and the reasons for viewing it;
- any member of staff who views an indecent image should be given appropriate support.

If any devices need to be confiscated (whether in order to view the image(s) or to pass evidence to the appropriate authority), they should be locked away securely until they are required.

If an electronic device that is prohibited by the College rules has been seized and the member of staff has reasonable grounds to suspect that it contains evidence in relation to an offence, or that it contains a pornographic image of a child or an extreme pornographic image, the device will be given to the police.

If external agencies do not need to be involved, the College must consider the deletion of any images. Pupils should be asked to delete images themselves and to confirm that this is done. Members of staff should not search devices to delete images.

If images have been shared online and cannot now be deleted by the person who shared them, the College should consider reporting the images to the relevant web host or



service provider (if an option is provided), or contacting the Internet Watch Foundation or ChildLine (if the website does not provide this option).

Where a pupil receives unwanted images, the College should advise the pupil and his / her parents of options that may be available to block the sender or to change the pupil's mobile phone number or email address.

For further information of support agencies and further information on how to respond to incidents of sexting, staff can refer to *Sexting in schools and colleges* (UK Council for Child Internet Safety, January 2017).

The College of Policing has also produced a briefing note *Police action in response to youth produced sexual imagery ('Sexting')* (November 2016) which provides information on how police forces treat instances of sexting by young persons.

SAFEGUARDING CHILDREN AND YOUNG PEOPLE

When there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm' a bullying incident should be addressed as a child protection concern under the Children Act 1989. Where this is the case, the school staff should discuss with the school's Designated Safeguarding Lead and report their concerns to First Response and work with them to take appropriate action.

First Response contact number: 0117 903 6444

BULLYING WHICH OCCURS OUTSIDE COLLEGE PREMISES

School staff members have the power to discipline pupils for misbehaving outside the school premises. Sections 90 and 91 of the Education and Inspections Act 2006 say that a school's disciplinary powers can be used to address pupils' conduct when they are not on school premises and are not under the lawful control or charge of a member of school staff, but only if it would be reasonable for the school to regulate pupils' behaviour in those circumstances. This may include bullying incidents occurring anywhere off the school premises, such as on school or public transport, outside the local shops, or in a town or village centre.

Where bullying outside school is reported to school staff, it should be investigated and acted on. The Head should also consider whether it is appropriate to notify the police or anti-social behaviour coordinator in their local authority of the action taken against a pupil. If the misbehaviour could be criminal or poses a serious threat to a member of the public, the police should always be informed.

While school staff members have the power to discipline pupils for bullying that occurs outside school, they can only impose the disciplinary sanction and implement that sanction on the school premises or when the pupil is under the lawful control of school staff, for instance on a school trip.

FREQUENTLY ASKED QUESTIONS



Q: Should we prioritise tackling some types of bullying over others?

A: Immediate physical safety obviously comes first. All bullying, whatever the motivation or method, is unacceptable and should not be tolerated. Some issues will be more familiar to schools than others and this policy points to guidance documents for further information about how to tackle specific types of bullying.

Q: Should I discipline pupils for bullying outside the school?

A: Yes. If an incident of bullying outside the school premises or online is reported to the school, it is important that it is investigated and appropriate action is taken. This will send a strong signal to pupils that bullying will not be tolerated and perpetrators will be held to account.

Q: How can we involve parents more in our anti-bullying work?

A: Schools should talk to parents about their anti-bullying policy and make it available to them and prospective parents as part of their behaviour policy. Schools should ensure that parents know what measures are being taken to prevent bullying, as well as how incidents are responded to, and may also encourage positive messages about good behaviour and respect for others at home.

Q: Should I record incidents of bullying?

A: Staff should develop a consistent approach to monitoring bullying incidents in their school and evaluating whether their approach is effective. All incidents of bullying and perceived bullying will be recorded on CPOMS.