Anti Bullying Policy

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1. POLICY STATEMENT

Plymouth CAST is committed to ensuring that all pupils feel **safe, valued and respected**, and are free from bullying in all its forms.

Bullying can have a profound and lasting impact on children's **well-being, mental health, attendance and achievement**. It is therefore treated as a **safeguarding concern where appropriate** and addressed promptly, consistently and effectively.

As a Catholic Trust, our approach is rooted in the teaching of Jesus Christ:

> *"Love one another. As I have loved you, so you must love one another."* (John 13:34)

This principle underpins our commitment to a culture of **belonging, dignity and compassion**, where all relationships are characterised by **kindness, forgiveness and respect**.

This policy reflects the Trust's commitment to:

- Gospel values, Catholic virtues and British values
- Relational and restorative practice
- Equity and inclusion
- Psychological safety and belonging

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2. LEGAL FRAMEWORK

This policy complies with:

- DfE *Preventing and Tackling Bullying*
- KCSIE 2025 (Parts 3 & 4)
- Equality Act 2010
- Education and Inspections Act 2006

Schools must:

- Prevent bullying through structured measures
- Address off-site bullying impacting welfare
- Prevent discrimination and harassment

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3. DEFINITION OF BULLYING

Bullying is:

> Behaviour that is **intentional, repeated, harmful**, and involves a **power imbalance**.

Not all conflict is bullying; however, all harmful behaviour is addressed.

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4. TYPES OF BULLYING

- Physical
- Verbal
- Social/relational
- Cyber
- Prejudice-based

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5. TRUST APPROACH

Aligned with the Behaviour Policy:

- Behaviour is communication
- Relationships are central
- Responses are **relational and restorative**

Core expectations:

- **Ready**
- **Respectful**
- **Safe**

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6. PREVENTION STRATEGY

To meet DfE expectations, all schools must implement a **codified, monitored prevention strategy**.

6.1 Five-Part Prevention Model

1. Preventative Curriculum

- PSHE/RHE curriculum covering:

    - Bullying, prejudice, protected characteristics
    - Online safety and digital conduct
- Assembly and tutor-time sequencing across the year
- Explicit teaching of **bystander responsibility**

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2. Environmental Controls

- Staff deployment in hotspots
- Structured unstructured times
- Safe reporting systems
- Clear expectations: *Ready, Respectful, Safe*

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3. Monitoring Cycles

Each school must implement:

- **Weekly operational review (DSL/SLT)**
- **Half-termly strategic review (SLT)**

Analysis must include:

- Frequency
- Severity
- Location
- Timing
- Repeat pupils
- Protected characteristics

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4. Intervention Pathways

- Early intervention (emerging patterns)
- Behaviour support plans
- Restorative conferencing
- Safeguarding escalation (where threshold met)
- External agency involvement

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5. Pupil Voice

- Annual survey
- Targeted vulnerable group voice
- Findings feed into improvement planning

7. REPORTING AND RESPONSE

7.1 Reporting Routes

All schools must provide:

- Direct reporting to staff/trusted adult
- Alternative reporting routes:

Wish my teacher knew boxes

Via other pupils – Mini Vinnies, buddies, school council or wellbeing

ambassadors

All schools must ensure that:

- All children, including those who are vulnerable, understand and are able to report concerns.

All concerns must be:

- Recorded accurately on CPOMS
- Categorised accurately
- Clearly identify:
    - Nature of concern
    - Actions taken
    - Outcomes and follow-up

Confidentiality will be respected, but will not prevent appropriate information sharing where safeguarding concerns exist

- CP/CIN named social worker notified (victim + perpetrator)
- EHCP student – SENCo + LA allocated worker notified - (victim + perpetrator)
- SEND/ other vulnerable student – SENCo notified - (victim + perpetrator)
- LAC – notify LA Virtual Headteacher

7.2 Investigation Standards

- Initiated within **24 hours**
- Completed within **48 hours (where possible)**
- Separate accounts gathered
- No assumptions made

7.3 Graduated Response Model

Level	Response
Emerging	Restorative conversation + monitor
Repeated	Parent contact + targeted support
Confirmed bullying	Restorative conference + sanction + plan
Serious / safeguarding	DSL/SLT referral + external agencies

7.4 Follow-Up

Schools must evidence:

- 48-hour check
- 1-week check
- Explicit recording: **“bullying stopped / not stopped”**

SECTION 8: SAFEGUARDING ALIGNMENT (KCSIE 2025 - review for 2026 version)

8.1 Bullying as a Safeguarding Concern

Bullying is recognised as a potential **safeguarding concern** and must always be considered within the wider context of a child’s safety, welfare and vulnerability.

Bullying may constitute **child-on-child abuse**, including (but not limited to):

- Physical abuse
- Emotional abuse
- Prejudice-based abuse
- Sexual harassment or sexual violence
- Online abuse

All staff must remain vigilant to the possibility that bullying behaviour indicates:

- Underlying safeguarding concerns
- Unmet needs or vulnerability
- Wider contextual safeguarding risks

Allegations of bullying behaviour towards a child by an adult will always be a **safeguarding issue** (see 8.3 below).

8.2 DSL Referral Thresholds

8.2.1 Referral TO the DSL (Internal Threshold)

All staff must refer concerns to the Designated Safeguarding Lead (DSL) where there is:

- Repeated bullying behaviour
- Prejudice-based bullying
- Cyberbullying
- Evidence of emotional distress, harm or vulnerability
- Any incident involving potential child-on-child abuse
- Any safeguarding concern or uncertainty
- Any allegation of bullying by an adult

Staff must adopt a **"when in doubt, refer"** approach.

All referrals must be:

- Recorded on CPOMS
- Shared with the DSL without delay

8.2.2 Referral BY the DSL (External Threshold)

The DSL will consider referral to external agencies (e.g. MASH/MARU, Police) where there is:

- Reasonable cause to suspect that a child is suffering, or is likely to suffer, **significant harm**
- Behaviour that is **sexualised, abusive or exploitative**
- Evidence of **coercion, intimidation or control**
- Persistent or escalating targeted abuse
- Potential criminal offences (e.g. assault, harassment, hate

crime) All decisions will be made in line with:

- **KCSIE 2025**
- Local safeguarding partnership thresholds

8.3 Bullying Involving Adults

Where concerns relate to the behaviour of an adult:

- This must **not be managed solely under this policy**
- It must be managed in accordance with:
    - Allegations against staff procedures
    - Low-level concerns procedures
    - Referral to the LADO where appropriate
    - Recorded on StaffSafe and cross-referenced on CPOMS Student Safe
    - Where appropriate, careful, sensitive and supportive restorative work must be undertaken
    - Where concerns are raised about an adult bullying other adults it will be dealt with the support of Trust HR through the Trust Staff Discipline Policy. However, the DSL/Headteacher/Trust HR must also consider whether there is any transferrable risk to children

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8.4 Record Keeping and Safeguarding Oversight

All bullying-related safeguarding concerns must:

- Be recorded accurately on CPOMS
- Clearly identify:
    - Nature of concern
    - Actions taken
    - Outcomes and follow-up
    - Where a victim/perpetrator is known to social services their named social worker must be informed
    - Where a victim/perpetrator is looked after by the local authority, the Virtual Headteacher must be notified
    - Where victim/perpetrator has an EHCP/allocated LA SEN worker, he/she must be informed.

The DSL will:

- Review patterns of bullying and safeguarding concerns
- Ensure appropriate escalation
- Maintain oversight of vulnerable pupils

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9. CYBERBULLYING

9.1 Reporting

- Pupils and staff report via established routes
- All incidents recorded

9.2 Evidence Preservation

Staff must:

- Instruct pupils **not to delete evidence**
- Secure:
    - Screenshots
    - URLs
    - Time/date

Staff must ensure that they do not view images that may be illegal.

If there is a possibility that images that have been sent or received are indecent or in any other way illegal they must not be viewed. The evidence should be preserved and reported to the police without viewing.

9.3 Response Protocol

- Assess harm, repetition, intent
- Apply behaviour or safeguarding response

9.4 Parent Guidance

Parents of victims and perpetrators will be:

- Informed promptly
- Provided with:
    - Online safety advice
    - Platform reporting routes

Parents will

- Ensure child and other children are safe
- Instruct children **not to delete evidence**
- Remove mobile phone/device

- Secure:
    - Screenshots
    - URLs
    - Time/date
- Seek support from/report to the school
- Contact the police/other agencies as required

Parents must ensure that they do not view images that may be illegal.

If there is a possibility that images that have been sent or received are indecent or in any other way illegal they must not be viewed. The evidence should be preserved and reported to the police without viewing.

9.5 Off-Site Cyberbullying

Schools will:

- Investigate
- Apply sanctions
- Involve external agencies where needed
- Ensure that school visits including residentials have robust mobile phone/device policies to keep children safe during the trip/visit. This must be included in the trip/visit planning

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10. OFF-SITE BULLYING

Schools will respond to bullying:

- On transport
- Online
- In the community

Where it impacts:

- Welfare
- Safety
- School environment

Schools will always respond to bullying on educational visits/trips/residentials, and incidents that occur during extra-curricular activities, regardless as to whether they are run by the school.

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11. SEXUAL HARASSMENT

11.1 Definition and Scope

Sexual harassment is defined as unwanted conduct of a sexual nature, which can occur online or offline, and both inside and outside of the school environment.

It can include (but is not limited to):

- Sexual comments, jokes, or taunting
- Sexualised name-calling or remarks about appearance
- Physical behaviour (e.g. unwanted touching, interfering with clothing)
- Displaying or sharing sexual images
- Online sexual harassment (including sharing of nude/semi-nude images, unwanted messages, or coercion)

Sexual harassment exists on a continuum and may overlap with sexual violence, which includes offences such as sexual assault.

11.2 Key Principles (KCSiE 2025 Expectations)

The school adopts a zero-tolerance approach to sexual harassment and sexual violence.

- Such behaviour is never acceptable and will not be dismissed as:
    - "banter"
    - "part of growing up"
    - "boys being boys"
    -
- All concerns will be:
    - Taken seriously
    - Acted upon promptly
    - Managed in a way that prioritises the safety and wellbeing of the child
- The school maintains an ethos of "it could happen here", ensuring vigilance at all times.

11.3 Whole-School Approach

In line with KCSiE, the school will ensure:

- A culture where sexual harassment is not tolerated or normalised
- Staff are trained to:
    - Recognise signs of sexual harassment and harmful sexual behaviour
    - Challenge inappropriate language and behaviour immediately

- Pupils are taught:
    - Ready, Respectful, Safe
    - About Consent, Responsibility and Respect, and the relationship between the three concepts.
    - What respectful relationships look like
    - That sexual harassment is unacceptable
- Systems are in place for safe reporting, including anonymous reporting where appropriate

Failure to challenge such behaviour risks normalising it and creating a culture where more serious harm can occur.

11.4 Responding to Reports

All reports of sexual harassment will be treated as safeguarding concerns.

The school will:

- Take all disclosures seriously and respond proportionately
- Ensure the victim is:
    - Reassured
    - Supported
    - Kept safe

A child should never be made to feel they are creating a problem by

reporting. The school will:

- Record concerns in line with safeguarding procedures
- Assess risk and take appropriate action
- Consider whether behaviour meets thresholds for:
    - Early Help
    - Child protection referral
    - Referral to external agencies (including police where appropriate)

11.5 Support for All Children Involved

The school recognises that:

- Victims may experience significant distress and impact on learning
- Children displaying harmful sexual behaviour may themselves require safeguarding support

Accordingly:

- Support will be provided to both victim and alleged perpetrator, as appropriate
- Sanctions and safeguarding responses may operate alongside each other

11.6 Online Sexual Harassment

The school recognises that sexual harassment increasingly occurs online and will:

- Educate pupils on:
    - Safe online behaviour
    - Consent and respectful communication
- Respond to incidents occurring outside school where they impact pupils' safety or wellbeing

11.7 Record Keeping and Confidentiality

All incidents will be:

- Be recorded accurately on CPOMS
- Clearly identify:
    - Nature of concern
    - Actions taken
    - Outcomes and follow-up

Confidentiality will be respected, but will not prevent appropriate information sharing where safeguarding concerns exist

11.8 Information Sharing

- CP/CIN named social worker notified (victim + perpetrator)
- EHCP student – SENCo + LA allocated worker notified - (victim + perpetrator)
- SEND/ other vulnerable student – SENCo notified - (victim + perpetrator)
- LAC – notify LA Virtual Headteacher

Sexual harassment is a serious safeguarding issue, not a behaviour issue alone.

It must be addressed with the same rigour as other forms of abuse.

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12. SUPPORT FOR PUPILS

Victims

- Trusted adult support
- Ongoing monitoring
- Pastoral intervention

- Specific support matched to individual need
- Outside agency support as required

Perpetrators

- Behaviour support
- Restorative intervention
- Education and reflection
- Specific support matched to individual need
- Outside agency support as required

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13. RECORDING, QA AND TRUST ASSURANCE

13.1 Recording and Reporting Expectations

All incidents must:

- Be reported to parents of victims and perpetrators where established as bullying **or where to do so is judged necessary to ensure child safety, or prevent escalation**

- **All Serious Bullying Incidents must be reviewed by SLT within 24 hours**

All incidents must:

- Be logged on CPOMS
- Include:
    - Category
    - Type
    - Outcome
    - Follow-up

All concerns about adult bullying must be recorded on StaffSafe and cross-referenced on CPOMS and reported to DSL/Headteacher immediately

- Include:
    - Category
    - Type
    - Outcome
    - Follow-up

External referral should be made where required

Concerns should be shared with other outside agencies/partners where necessary to safeguard child/children or support welfare/wellbeing:

- CP/CIN named social worker notified (victim + perpetrator) at Emerging and above levels
- EHCP student – SENCo + LA allocated worker notified - (victim + perpetrator)
- SEND/ other vulnerable student – SENCo notified - (victim + perpetrator)
- LAC – notify LA Virtual Headteacher

Staff must not assume that another party has reported the concern

Confidentiality and data protection will be respected, this will not prevent or delay the sharing of information

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13.2 WEEKLY QA

DSL/SLT must:

- Review *Serious Bullying Incidents* within 24 hours
- Audit entries weekly
- Check:
    - Accuracy
    - Completeness
    - Timeliness
    - Follow-up

13.3 TRUST-LEVEL OVERSIGHT

The Trust will maintain a **central bullying dashboard**, analysing:

- Total incidents per school
- Persistent cases
- Series incidents
- Prejudice-based incidents
- Repeat victims/perpetrators
- Hotspot locations
- Trends over time

Termly report to Education and Standards Committee

13.4 ANALYTICAL EXPECTATIONS

Schools must analyse:

- Frequency
- Severity

- Triggers
- Patterns
- Protected characteristics
- Location/hotspots

➡ Including **disproportionality analysis**

13.5 GOVERNOR OVERSIGHT

Each Local Governing Body receives:

Termly report including:

- Incident numbers
- Patterns/trends
- Vulnerable groups
- Actions taken
- Impact evaluation

13.6 TRUST ASSURANCE

The Trust will:

- Review data termly
- Challenge schools where patterns emerge
- Provide targeted support/intervention

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14. ARTIFICIAL INTELLIGENCE (AI)

AI misuse (e.g. deepfakes, impersonation) will be:

- Treated as bullying
- Managed through behaviour and safeguarding systems

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15. COMPLAINTS

Unresolved concerns:

- Follow Trust complaints procedure

- Safeguarding concerns will always be investigated immediately outside the complaints policy. The complaints process must not delay the response to safeguarding concerns.

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16. MONITORING AND REVIEW

This policy will be:

- Reviewed annually
- Evaluated through:
    - CPOMS data
    - Pupil voice
    - QA findings
    - Trust oversight

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17. ROLES AND RESPONSIBILITIES

All Staff

- Know, understand and follow this policy
- Take all reports of bullying seriously
- Act promptly to ensure child is safe, record accurately and report appropriately
- Follow safeguarding procedures where concerns meet threshold

Designated Safeguarding Lead (DSL)

- Ensure child/children is/are safe
- Assess whether the incident meets safeguarding thresholds (KCSiE Part 4)
- Determine whether referral to external agencies (e.g. police, MASH, LADO where relevant) is required
- Ensure reporting and information sharing as required
- Oversee complex or serious cases

Senior Leaders / Headteacher

- Ensure that school's *Anti-Bullying Strategy* is bespoke to the school, meets minimum expectations set out by trust model, included as Appendix A in this document, and is fully and effectively implemented
- Keep the school's Anti-Bullying Strategy is regularly reviewed, and revised as required.
- Ensure appropriate sanctions and support are implemented
- Ensure consistency with behaviour policy and statutory guidance
- Monitor patterns and trends
- Review all Serious Bullying cases within 24 hours

Trust

- Provide guidance, training and oversight to ensure consistent practice across schools

Appendix A

St.Mary's Catholic primary school ANTI-BULLYING STRATEGY (OPERATIONAL DOCUMENT)

1. PURPOSE

This document sets out the school's **operational anti-bullying strategy**, demonstrating how we:

- Prevent bullying
- Identify and respond to bullying
- Monitor patterns and trends
- Evaluate impact and continuously improve

This strategy sits alongside the School's **Anti-Bullying Policy** and provides **implementation detail** in line with DfE expectations.

2. STRATEGIC MODEL

The school adopts a **four-part model**:

PREVENT → IDENTIFY → RESPOND → REVIEW

3. PREVENTION STRATEGY

3.1 Curriculum Mapping (Planned & Sequenced)

PSHE /RHE/RSHE Coverage

Year Group	Key Content
YR	Importance of valuing self. Strategies for developing healthy relationships. Staying safe online. Caring for ourselves and others. Jobs in our community.
Y1	Anti-Bullying. Feeling safe safety in familiar situations. People who help keep them safe outside the home. Staying safe online. How behaviour affects others. People who help us.
Y2	People who keep us safe. Rules to helps us. Treating others well. Saying sorry. Real life online.
Y3	Self esteem. See it, say it, stop it. Online safety. Family, friends and others. When things feel bad. Sharing online. Chatting online.
Y4	Equality. Democracy. Anti-bullying. Harmful content. What am I feeling?
Y5	Role models. Media images. Racism. Prejudice. Discrimination. Online safety. Under pressure. Build each other up. Cyberbullying. Abuse. Making good choices.
Y6	Anti-bullying. Diversity. Social media. Privacy and data. Online safety. Anti-social behaviour. Human rights. Feelings. Emotional changes. Viewing online.

Assembly Programme (Annual Cycle)

- Anti-Bullying Week (November)
- Respect and inclusion themes (termly)
- Online safety (each term)
- Student voice feedback themes

Classroom Programme

- Weekly structured British values circle times
- Scenario-based learning and social stories
- Reporting pathways

3.2 Behaviour & Culture

- Clear expectations: Ready, Respectful, Safe
- Relational practice embedded across school
- Staff model respectful interactions at all times – Code of Conduct
- Zero tolerance of humiliation or shaming

3.3 Environmental Controls

- Staff deployed in identified hotspot areas
- Staggered/structured social times
- Safe spaces available (e.g. pastoral base)
- Anonymous reporting route (if in place)

3.4 Staff Training

- Annual safeguarding & anti-bullying training
- Induction training for new staff

- CPOMS recording expectations
- Cyberbullying procedures

4. IDENTIFICATION OF BULLYING

4.1 Reporting Routes

Pupils can report via:

- Any trusted adult
- Pastoral team
- Safeguarding team

4.2 Staff Responsibilities

All staff must:

- Take concerns seriously
- Record on CPOMS the same day
- Refer to DSL where appropriate
- Refer Serious Bullying incidents to SLT
- Share information with EVC/Trip leader ahead of residential visits

4.3 Early Identification Indicators

- Repeated low-level incidents
- Friendship breakdown patterns
- Attendance dips
- Emotional distress

5. RESPONSE TO BULLYING

5.1 Investigation Standards

- Initiated within **24 hours**
- Evidence gathered (including online evidence)
- Separate accounts taken

5.2 Response Model

Level	**Response**
Emerging	Restorative conversation
Repeated	Parental contact + monitoring (victim + perpetrator)
Confirmed bullying	Sanction + support plan + parent contact (victim + perpetrator)
Serious	DSL referral / external agencies

5.3 Safeguarding Integration

- DSL involved where threshold met
- Links to child-on-child abuse
- External referral where required
- CP/CIN named social worker notified (victim + perpetrator) at Emerging and above levels
- EHCP student – SENCo + LA allocated worker notified - (victim + perpetrator)
- SEND/ other vulnerable student – SENCo notified - (victim + perpetrator)
- LAC – notify LA Virtual Headteacher

5.4 Follow-Up (Non-Negotiable)

- 48-hour check
- 1-week review
- CPOMS outcome recorded

6. MONITORING CYCLES

6.1 Weekly Monitoring (Operational)

Led by: DSL / Pastoral Lead

- Review new incidents
- Check quality of CPOMS entries
- Identify immediate risks
- Liaise with other staff as required

6.2 Half-Termly Review (Strategic)

Led by: SLT

Analysis must include:

- Number of incidents
- Repeat victims/perpetrators
- Hotspot locations
- Timing patterns
- Protected characteristics
- Integrate with attendance monitoring i.e where absence is high or patters consider bullying as a trigger and check

6.3 Termly Trust/Governor Review

Reported to:

- Governors / Trust

Includes:

- Trends over time
- Impact of interventions
- Disproportionality analysis

7. DATA ANALYSIS

The school analyses:

- Frequency
- Severity
- Patterns
- Triggers
- Groups

affected Including:

- SEND
- Disadvantaged
- LAC
- Gender
- Ethnicity
- Other protected characteristics

8. EVALUATION AND IMPACT

8.1 Measures of Success

- Reduction in repeated incidents
- Reduction in hotspot incidents
- Improved pupil perception of safety
- Reduction in persistent absence linked to bullying

8.2 Pupil Voice

- Annual survey
- Focus groups
- Targeted vulnerable groups

8.3 Staff Voice

- Staff survey
- Behaviour/safeguarding reviews

8.4 Quality Assurance

- CPOMS audits
- Case reviews
- SLT sampling

9. CONTINUOUS IMPROVEMENT

The school will:

- Adapt curriculum based on trends
- Adjust staffing in hotspots
- Refine reporting systems
- Provide targeted interventions

10. GOVERNANCE AND ACCOUNTABILITY

- DSL: operational oversight
- SLT: strategic leadership
- Governors: accountability and challenge
- Trust: monitoring and support

11. LINKED DOCUMENTS

- Anti-Bullying Policy
- Behaviour Policy
- Safeguarding Policy
- Online Safety Policy