

ACT Schools Anti-bullying and Harassment Policy and Procedures

Commitment

We recognise that behaviour is a form of communication and take a trauma-informed approach to addressing bullying and harassment. This enables us to understand the factors that may contribute to behaviours and to promote restorative and reflective practice with pupils. A trauma informed perspective takes into account motivation, fear, trauma response context of the person displaying bullying behaviour.

Bullying and harassment are unacceptable behaviours that can have a significant impact on individuals and the wider school community. ACT Schools is committed to creating an environment in which bullying, harassment and victimisation are not tolerated and where every pupil and member of staff is treated with dignity, respect and fairness.

ACT Schools promotes a positive culture of behaviour in which pupils are encouraged to treat one another and staff with respect and to understand the importance of making positive choices. Respect for others, an understanding of the value of learning and an awareness of how our actions and words can affect others are embedded within the everyday life of the school and reinforced consistently by staff and pupils.

Staff and leaders are committed to taking a proactive and preventative approach to bullying and harassment. This includes creating a safe, inclusive and respectful environment, identifying potential concerns at an early stage and providing pupils with opportunities to develop their understanding of positive relationships, respect and the impact of their behaviour on others.

All pupils are introduced to ACT Schools' expectations and approach to bullying and harassment as part of the induction process. Pupils are made aware of how to report concerns and are encouraged to speak to a trusted member of staff if they experience or witness behaviour that causes them concern.

ACT Schools' approach has been informed by the Welsh Government's Challenging Bullying and Harassment: Rights, Respect, Equality – Statutory Guidance for Schools and Settings, ensuring that our practice reflects the principles of respect, equality, inclusion and the rights of all children and young people.

Under this guidance, we are committed to:

- Take a proactive approach to prevent all forms of bullying and harassment
- Have an anti-bullying policy linking to wider school policies including behaviour and safeguarding
- Record and monitor incidents of bullying and harassment to help take pro-active steps to challenge bullying and harassment
- To regularly review our anti-bullying and harassment policy and strategy in collaboration with the pupils
- Adopting a whole-school approach for promoting positive, respectful behaviour between staff and pupils as part of our whole-school approach to health and well-being
- Providing a focus on positive behaviour and action, emphasising what pupils should be doing, rather than concentrating on negative behaviour underpinned by a 'must not' culture
- Utilising tailored intervention approaches when faced with incidents of bullying and harassment

Purpose

The aim of this policy is to enable ACT School staff, volunteers and pupils to deal with bullying and harassment when it occurs and even more importantly to prevent it, ensuring that everyone can operate in a supportive, caring and safe environment without disruption and fear of being bullied.

Scope

This policy document applies to all staff, pupils and volunteers.

Responsibilities

The Headteacher, Delivery Directory, and Deputy Head of Behaviour & Engagement have overall responsibility for this policy and its implementation.

The Headteacher is:

- The 'owner' of this policy and these procedures and has overall responsibility for reviewing, updating and controlling this policy and related documents.
- Responsible for regularly reviewing all instances of bullying and harassment that have been reported within the Schools Provision.
- Responsible for regular monitoring of MyConcern to ensure that instances of bullying and harassment are being dealt with appropriately.

Members of staff are responsible for:

- Ensuring awareness of, and adherence to this policy and procedure
- Approaching all concerns of bullying and harassment with seriousness and impartiality
- Reporting any incidents via My Concern

Communication and Storage

This policy and these procedures will be communicated to staff on induction.

It will be stored on ACT's online HR system, IRIS HR, where staff will be required to read and accept the document.

Procedure

ACT Schools recognises the significant impact that bullying and harassment can have on a pupil's safety, wellbeing, confidence and ability to engage positively with education. Bullying can affect a pupil's emotional wellbeing, sense of belonging, attendance, engagement and educational progress. It can also have a particularly significant impact on pupils who may be more vulnerable to being targeted because of their individual circumstances or characteristics.

ACT Schools takes all concerns relating to bullying and harassment seriously and responds proportionately to the circumstances of each individual case. The immediate priority in any situation involving violence or a risk to physical safety is to ensure that all pupils and staff are safe. However, the school also recognises that emotional, verbal, relational and online forms of bullying can have a significant and, in some circumstances, longer-lasting impact. Staff therefore consider both the immediate and wider impact of an incident when determining the most appropriate response.

ACT Schools also recognises that pupils who engage in bullying behaviour may themselves have underlying needs, difficulties or experiences that require support. This does not diminish the impact of their behaviour or remove the need for appropriate consequences. Rather, it provides an opportunity to help pupils understand the impact of their actions, develop appropriate behaviours and make positive changes. All pupils have the right to be supported to understand expectations and develop positive relationships, with ACT Schools' Pupil Standards providing a clear framework for this. Further information can be found within the ACT Schools Behaviour Management Policy.

Recognising and reporting bullying

Pupils experiencing bullying may demonstrate changes in their behaviour or presentation. This could include becoming withdrawn or isolated, appearing more anxious or nervous, reporting illness, increased or unusual absence, reduced concentration or engagement, changes in the quality of work, or an increased reluctance to attend or participate in school.

However, these behaviours do not necessarily indicate that a pupil is experiencing bullying, and bullying may occur without any obvious changes in behaviour. Staff therefore remain alert to a range of indicators and consider concerns within the wider context of the pupil's individual circumstances.

Pupils are encouraged to speak openly with staff and report any concerns about bullying, harassment or the behaviour of others. Staff promote a culture in which pupils feel listened to, believed and supported to raise concerns at the earliest opportunity. All reports and concerns are taken seriously, investigated appropriately and used to inform the support and actions required to safeguard the wellbeing of those involved.

Preventative approach

ACT Schools aims to take a proactive and preventative approach to bullying and harassment. Our response does not begin only when an incident is reported; it starts from the point at which a pupil joins the school.

During induction, pupils are introduced to the school's expectations around respectful behaviour and the pastoral and wellbeing team will discuss the Anti-Bullying and Harassment Policy, ensuring that they understand their rights and responsibilities within the school community.

Staff proactively gather information about existing relationships, concerns or potential areas of conflict between pupils. This intelligence is gathered through the referral and induction process, including home visits for new pupils, and is used to identify potential risks and put appropriate strategies and support in place at the earliest opportunity. This enables staff to take preventative action and reduce the likelihood of bullying, harassment or conflict occurring.

Pupils are supported to develop an understanding of difference, respect and positive relationships through planned sessions, dedicated events, projects and individual discussions where appropriate. These opportunities encourage pupils to explore issues such as equality, diversity, respect and the impact that bullying and harassment can have on others.

ACT Schools also uses whole-school and organisation-wide initiatives, including Anti-Bullying Week, to reinforce key messages and develop pupils' knowledge and understanding of bullying and harassment. Pupils and staff are actively involved in these initiatives, including contributing to the development of resources and activities, ensuring that approaches reflect the experiences and needs of our pupils.

Open and honest communication between pupils and staff is actively encouraged. Pupils are provided with opportunities to raise concerns, share information and seek support from trusted members of staff. Staff remain vigilant to changes in behaviour, relationships and presentation and are encouraged to act on concerns at an early stage, ensuring that appropriate support and intervention can be put in place promptly.

Responding to incidents of Bullying and/or Harassment

ACT Schools will respond to incidents of bullying and harassment in a proportionate and individualised manner, taking account of the nature, seriousness and frequency of the behaviour, the impact on those involved and any relevant additional needs or vulnerabilities.

Concerns may relate to behaviour occurring within the school environment or, where there is an impact on pupils or the wider school community, behaviour occurring outside of ACT Schools. This may include incidents on public transport, in the local community or through online platforms and social media.

All concerns relating to bullying and harassment must be reported to the Headteacher, Deputy Head of Behaviour & Engagement and Deputy Head of Safeguarding, Pastoral & Attendance and recorded on MyConcern in accordance with ACT Schools' safeguarding procedures.

The Headteacher, Deputy Head of Engagement & Behaviour, and Deputy Head of Safeguarding, Pastoral & Attendance, will determine the appropriate response.

Depending on the circumstances, this may include:

- Speaking individually with those involved
- Gathering information from witnesses and other relevant individuals
- Reviewing available evidence, including digital evidence where appropriate
- Providing targeted support or intervention;
- Restorative approaches or facilitated discussions, where appropriate and safe to do so
- Applying appropriate behaviour management measures
- Making referrals to external agencies where safeguarding or other concerns require this.

Where an incident may constitute a criminal offence, ACT Schools will follow the procedures set out in the Safeguarding Policy and seek advice from the wider company Designated Safeguarding Lead. Where appropriate, this may include a referral to the police or relevant social care services.

Any response will take account of the individual needs of the pupils involved, including any additional learning needs or disabilities, while maintaining clear expectations around behaviour, safety and respect.

Serious incidents and criminal behaviour

Some forms of bullying and harassment may constitute criminal offences. These may include, but are not limited to:

- physical violence or assault;
- theft or deliberate damage to property;
- serious or repeated harassment, intimidation or threats;
- hate-related incidents or hate crime;
- threatening or abusive communications;
- serious online abuse or harassment; and
- other behaviour that may meet the threshold for a criminal offence.

Where there is an immediate risk to life or serious physical harm, staff should call 999.

All incidents must be recorded and managed in accordance with ACT Schools' Safeguarding Policy.

Cyberbullying

Where concerns involve cyberbullying or online harassment, pupils should be encouraged to preserve relevant evidence wherever possible. This may include retaining messages, emails, screenshots, images, posts or other digital information and recording relevant dates and times.

Pupils should not be encouraged to engage with, retaliate against or further distribute harmful content. Staff should provide appropriate guidance and follow the school's safeguarding procedures where online behaviour presents a risk to a pupil's safety or wellbeing.

Managing concerns

When a concern about bullying or harassment is raised, ACT Schools will take the following steps, as appropriate to the circumstances:

1. Listen and respond

Pupils who believe they are experiencing bullying or harassment should be encouraged to tell a trusted member of staff as soon as possible. Pupils who do not feel confident reporting a concern independently should be encouraged to seek support from a trusted friend or another adult.

2. **Record the concern**
Staff must not ignore or dismiss a concern. Relevant information should be recorded promptly on MyConcern in accordance with safeguarding procedures. The Deputy Head of Safeguarding, Pastoral & Attendance will be notified where appropriate.
3. **Establish the facts**
The Headteacher, Deputy Head of Behaviour & Engagement and the Deputy Head of Safeguarding, Pastoral & Attendance, will establish what has happened by speaking with the pupil raising the concern and, where appropriate, witnesses and other relevant individuals. Information and evidence will be recorded on MyConcern.
4. **Speak with the pupil whose behaviour is alleged to have caused concern**
Once sufficient information has been gathered, the pupil concerned will be given an appropriate opportunity to provide their account. This discussion will be recorded and managed fairly and sensitively.
5. **Consider safeguarding and confidentiality**
Information will be shared on a need-to-know basis and in accordance with safeguarding requirements. Pupils should be made aware that absolute confidentiality cannot always be guaranteed where information needs to be shared to safeguard them or others.
6. **Inform parents or guardians**
Parents or guardians will be informed where appropriate and in accordance with safeguarding requirements. ACT Schools will work with families to support the pupils involved and to reduce the likelihood of further incidents.
7. **Implement appropriate actions and support**
Appropriate interventions, support and/or behaviour management measures will be put in place based on the circumstances and seriousness of the incident.
8. **Communicate relevant information to staff**
Staff who work with the pupils involved will be made aware of relevant information and any agreed strategies necessary to support their safety and wellbeing.
9. **Review and follow up**
Follow-up contact will take place to assess whether the situation has improved, whether further support is required and whether any further action is necessary. The frequency and nature of follow-up will reflect the circumstances of the individual case.
10. **Maintain appropriate records**
Relevant evidence, actions, outcomes and follow-up arrangements will be recorded on the appropriate MyConcern case.

Monitoring of incidents

The Headteacher is responsible for overseeing the management and monitoring of reported incidents of bullying and harassment within the Schools Provision.

MyConcern records will be reviewed regularly to ensure that concerns are being appropriately recorded, responded to and followed up. Patterns or trends in incidents will be considered to identify any emerging risks, particular locations, behaviours or groups that may require additional preventative action.

The Headteacher will ensure that the Anti-Bullying and Harassment Policy is reviewed regularly and remains aligned with current legislation, Welsh Government guidance and relevant national initiatives.

Information gathered through incident monitoring will be used, where appropriate, to inform staff training, pupil education, preventative work and wider school improvement.

Involvement of Parents/Carers

ACT Schools recognises the important role that Parents/Carers play in identifying and addressing concerns about bullying and harassment. Parents or carers may be the first to raise a concern and may understandably be upset or distressed when doing so.

Staff should:

- Listen carefully and take concerns seriously
- Remain calm, professional and empathetic
- Avoid making assumptions before the circumstances have been established
- Acknowledge the concerns raised and explain the steps that will be taken
- Explain relevant school procedures and expectations
- Maintain appropriate communication throughout the process.

ACT Schools will work constructively with parents and carers to support the wellbeing and safety of pupils while maintaining appropriate confidentiality and safeguarding requirements.

Behaviour management and sanction(s)

Where an investigation establishes that a pupil has engaged in bullying or harassment, ACT Schools will respond in accordance with the Behaviour Management Policy. Any action taken will be proportionate to the seriousness and circumstances of the behaviour and will take account of the individual needs of the pupil.

Actions may include, but are not limited to:

- Individual behaviour targets or a behaviour support plan
- Targeted intervention to address the behaviour and its underlying causes
- Restorative or relational approaches, where appropriate and safe
- Increased monitoring and review
- Internal exclusion (re-engagement room) or other appropriate behaviour management measures
- Fixed-term exclusion where the seriousness of the incident warrants this and
- Permanent exclusion in the most serious circumstances, in accordance with the act schools end of placement policy.

The use of sanctions will be accompanied, where appropriate, by support and intervention designed to help the pupil understand the impact of their behaviour, develop more positive behaviours and reduce the risk of recurrence. Further information can be found ACT Schools Behaviour Management Policy.

Any decision regarding exclusion will be made in accordance with the relevant legislation, guidance and ACT Schools' Exclusion Policy.

Complaints and feedback

Where a pupil, parent, carer or other party is dissatisfied with the way ACT Schools has managed a bullying or harassment concern, they may raise their concerns through the ACT Schools Complaints Policy.

Support for pupils

ACT Schools recognises that both experiencing and engaging in bullying or harassment can have an impact on a pupil's emotional wellbeing, confidence, relationships and engagement with education.

The school will consider the individual support needs of all pupils involved and will seek to ensure that appropriate support is provided. This may include:

- Regular check-ins with a trusted member of staff
- Support from the pastoral or wellbeing team
- Targeted emotional wellbeing or behaviour support
- Opportunities to rebuild positive relationships and confidence
- Adjustments to routines or timetables where appropriate and necessary
- Support to reintegrate into full-time education following a period of absence or reduced attendance and
- Referral to appropriate internal or external services where further specialist support is required

Where a pupil has engaged in bullying or harassment, ACT Schools will seek to understand and address any underlying factors contributing to the behaviour. Support will focus on helping the pupil develop self-awareness, understand the impact of their actions, take responsibility for their behaviour and develop safer and more respectful ways of interacting with others.

The wellbeing and safety of the pupil experiencing bullying remains a priority, while appropriate support and accountability will also be provided to the pupil responsible for the behaviour

Staff Training

ACT Schools recognises that effective prevention and management of bullying and harassment relies on staff having the knowledge, skills and confidence to identify concerns, respond appropriately and promote positive relationships.

All staff will receive information and guidance on ACT Schools' approach to preventing and responding to bullying and harassment as part of their induction. This will be reinforced through regular opportunities to review the Anti-Bullying and Harassment Policy and related procedures during staff meetings and professional development activities.

The Anti-Bullying and Harassment Policy should be read alongside the ACT Schools Behaviour Management Policy and Safeguarding Policy. Staff will be made aware of the links between these policies and their respective responsibilities for identifying, recording, reporting and responding to concerns.

Staff training will be reviewed regularly and may be adapted to reflect emerging trends, incidents, patterns of behaviour or areas of concern identified within the Schools Provision. Where appropriate, INSET and other professional development opportunities may be used to provide additional training or refresh staff knowledge and practice.

Where specialist training is required, ACT Schools may work with relevant external agencies and professionals to ensure that staff receive appropriate and up-to-date guidance. This may include training relating to specific forms of bullying and harassment, safeguarding, online safety, equality and diversity, or other emerging areas of need.

The effectiveness of training will be considered through staff feedback, monitoring of incidents, safeguarding reviews and wider school improvement activity. This will help ensure that staff development remains responsive to the needs of the school and its pupils.

Document / Policy Change Request

Any changes to this Policy and Procedure must be agreed with the Headteacher.

Document / Policy Reviewing and Approving

This document will be reviewed annually by the Headteacher.

References

- ACT Safeguarding Policy
- ACT Schools Exclusion Policy
- ACT Health and Safety Policy and Procedure
- ACT Behaviour Policy and Procedure
- ACT Complaints Policy and Procedure
- Welsh Government guidance - Rights, respect, equality: Statutory guidance for governing bodies in relation to Anti-bullying

Glossary

Bullying

For the purpose of this policy, ACT Schools defines bullying as, deliberately hurtful behaviour, repeated over a period of time, where it is difficult for those being bullied to defend themselves.

This includes all forms of bullying:

- Emotional – being unfriendly, excluding, tormenting (e.g. hiding personal possessions, threatening gestures).
- Physical – pushing, kicking, hitting, punching, pinching or any use of physical violence.
- Sexual – unwanted physical contact or sexually abusive comments.
- Racial – racist taunts, graffiti, gestures.
- Homophobic – because of or focussing on the issue of sexuality.
- Verbal – name calling, sarcasm, spreading rumours, teasing.
- Cyber – all areas of the internet, email, online chat facilities, posting derogatory and abusive comments, footage and images on social networking sites.
- Mobile – threats via text messaging and telephone calls.
- Misuse of technology – improper use of camera and other recording devices.
- Prejudice – including & beyond the protected characteristics.
- Relational aggression – harm to relationship or social status.

Bullying is behaviour by an individual or group that is intended to hurt, intimidate, humiliate or undermine another individual or group, and which is repeated over time or has the potential to be repeated. Bullying can cause physical, emotional or psychological harm and can have a significant impact on a pupil's wellbeing, confidence, sense of safety and ability to engage in education. Bullying may be motivated by a perceived difference as well as an actual difference. It can also involve indirect participation, where an individual encourages, influences or manipulates others to tease, exclude, intimidate or target another pupil without directly participating themselves.

Bullying is not always obvious or easily identified. It may be overt and intimidating, but can also be subtle, persistent and difficult to recognise. Staff therefore consider the wider context, relationships and impact on the pupil when responding to concerns.

Cyberbullying

The widespread use of digital technology and social media has created additional opportunities for bullying to take place both within and outside the school environment. Cyberbullying can take many forms, including abusive messages, threatening or humiliating comments, sharing images or information without consent, deliberately excluding individuals from online groups, or encouraging others to participate in harmful behaviour.

Unlike some forms of face-to-face bullying, cyberbullying can occur at any time of day or night and can reach a potentially much larger audience. Content can also be quickly shared, copied or forwarded, making it difficult to control once it has been posted or distributed.

ACT Schools recognises that behaviour occurring online, including outside of school hours or away from the school site, can have a significant impact on pupils' safety, wellbeing and ability to engage positively in school. Where appropriate, ACT Schools will respond to concerns about cyberbullying in accordance with this policy, its Behaviour Management Policy and relevant safeguarding procedures.

Examples of unacceptable behaviour include:

- Verbal abuse, name calling, teasing or making offensive remarks
- Humiliation, either in one's own eyes or others' eyes
- Using social websites, mobile phones, text messages, photos, videos or e-mails to intentionally upset others
- Indirect emotional abuse by excluding from social groups or spreading malicious rumours

Harassment

ACT Schools defines harassment as someone behaving in a way which makes another person feel distressed, humiliated or threatened.

Examples of harassment include:

- unwanted phone calls, letters, emails or visits
- sexual harassment, including verbal remarks or unwanted physical contact
- abuse and bullying online
- verbal abuse and threats
- damage to property or possessions
- information spread maliciously in a way that is calculated to cause distress or telling lies about a person.

ACT Schools staff are expected to remain vigilant to the potential signs and indicators of bullying and harassment and to respond to concerns promptly, appropriately and consistently. Any concerns raised by pupils, staff, parents or other professionals will be taken seriously and addressed in accordance with the ACT Schools Safeguarding Policy and Handbook and Behaviour Management Policy.

Staff should use their professional judgement when assessing concerns, taking account of the individual circumstances, relationships and wellbeing of the pupils involved. Where appropriate, information will be shared with relevant members of staff to ensure that concerns are managed effectively and that appropriate support and intervention are put in place.

Where an incident may constitute a criminal offence, staff must follow the procedures set out within the ACT Schools Safeguarding Policy. This may include seeking advice from the Designated Safeguarding Lead and, where appropriate, making a referral to the relevant external agency or reporting to the police.