Policy Information Sheet

Name of Policy:	**Anti Bullying Policy**
Delegated Authority	☒ Trust Board ☐ Nominated Committee ☐ CEO ☐ CFO ☐Other _____
Policy review cycle	☒ Annual ☐ 3 years ☐ 4 years ☐ Other _____
Statutory policy	☒ Yes ☐ No
Published online	☐ Statutory ☒ Trust recommended ☐ No

Document Control			
Created by (author)		L.McLean	
Date created		May 2024	
Approved by		Trust Board	
Date approved		May 2024	
Next Review Date		July 2027	
Recorded in minutes			
Document History			
Version	Author	Revisions	Final approval date
1.0			May 2024
2.0		No changes.	July 2025
3.0	R.Kitson	Updated in line with DfE guidance and current practices.	14.07.2026

1. Policy statement

Hartlepool Free School is committed to providing a safe, respectful and inclusive environment where all pupils are protected from bullying, harassment, discrimination and child-on-child abuse.

Bullying will never be tolerated, ignored or dismissed as “banter”, “just having a laugh” or “part of growing up”. All pupils have the right to feel safe, valued and able to learn.

As an SEMH school, we recognise that behaviour is often a symptom and a form of communication. Pupils may communicate distress, unmet need, trauma, anxiety, sensory overload, social misunderstanding or emotional dysregulation through their behaviour. However, this does not excuse bullying or harmful behaviour. Our approach combines nurture, curiosity and support with clear boundaries, safety, accountability and personal responsibility.

2. Aims

This policy aims to:

- prevent bullying through a whole-school culture of kindness, safety and respect;
- ensure pupils know what bullying is and how to report it;
- ensure staff respond quickly, consistently and proportionately;
- ensure victims are listened to, taken seriously, supported and kept safe;
- ensure pupils who display bullying behaviour are held accountable and supported to change;
- ensure bullying is recognised as a potential safeguarding concern where appropriate;
- protect pupils with SEND, communication needs, SEMH needs and other vulnerabilities;
- ensure leaders monitor bullying, identify patterns and evaluate the impact of actions taken.

3. School values

This policy is underpinned by the Make It Different Trust values:

Kindness — we are friendly, generous and considerate. We do not hurt others with words or actions.

Personal Responsibility — we own what we do and learn from our choices.

Growth Mindset — we believe pupils can learn, repair harm and make better choices.

Resilience — we support pupils to recover, seek help and move forward. Resilience does not mean tolerating bullying.

4. Definition of bullying

Bullying is behaviour by an individual or group, usually repeated over time, that intentionally hurts, frightens, humiliates, excludes or harms another person or group.

Bullying often involves an imbalance of power. This may be linked to age, size, popularity, confidence, social status, SEND, disability, communication ability, vulnerability, sexuality, race, religion, sex, gender, online influence, peer group pressure or perceived difference.

Bullying can be:

- physical;
- verbal;
- emotional or social;
- online;
- sexual;
- discriminatory or prejudice-based;
- indirect, such as rumours, exclusion or manipulation;
- part of wider child-on-child abuse.

A single serious incident may not meet the usual definition of repeated bullying but will still be taken seriously. Some one-off incidents may be safeguarding concerns, hate incidents, criminal matters or serious breaches of the behaviour policy.

The school will not wait for behaviour to become repeated before acting.

5. Types of bullying

Bullying may include:

- hitting, kicking, pushing, grabbing, spitting or threatening physical harm;
- name-calling, insults, mocking, humiliation or repeated criticism;
- damaging, hiding or taking belongings;
- excluding someone deliberately or encouraging others to isolate them;
- spreading rumours or sharing private information;
- deliberately provoking, triggering or antagonising a pupil;
- racist, homophobic, biphobic, transphobic, sexist, misogynistic or disability-based abuse;
- comments about appearance, family, poverty, care status, religion, culture, sexuality, gender, SEND or health needs;
- sexual comments, jokes, rumours, pressure, unwanted touching or online sexual harassment;
- cyberbullying through messages, group chats, gaming, social media, images, videos, memes or AI-generated content;
- recording or sharing incidents without consent;
- pressuring someone to share images, information or personal content.

Sexual violence, sexual harassment, sharing nudes or semi-nudes, coercion, exploitation, serious threats, hate incidents or violence will be managed in line with the Child Protection and Safeguarding Policy.

6. Local context

Hartlepool Free School recognises that bullying and child-on-child harm can happen inside school, outside school, online and in the community. Our pupils may experience vulnerability linked to SEMH needs, SEND, trauma, social communication needs, online activity, peer influence, unsafe community spaces, anti-social behaviour, exploitation risk and travel to and from school.

Staff will use professional curiosity and contextual safeguarding to consider where bullying is happening, who else may be involved, whether there are wider peer group concerns, and whether external agency support is needed.

7. Bullying, safeguarding and child-on-child abuse

Bullying may be a behaviour matter, a pastoral matter, a safeguarding matter, or all three.

Staff must report concerns to the DSL or Deputy DSL where bullying:

- makes a pupil feel frightened, unsafe or at risk;
- is violent, threatening or coercive;
- involves sexual harassment or sexual violence;
- involves discriminatory abuse or hate language;
- involves online abuse, image sharing, blackmail or humiliation;
- is linked to exploitation, serious violence, radicalisation or harmful peer groups;
- affects a pupil's mental health, attendance, self-care, eating, sleep or wellbeing;
- involves a pupil with SEND, disability, trauma history, communication needs or other vulnerability;
- suggests wider peer culture or environmental concerns.

Where a child is in immediate danger or at risk of significant harm, staff must follow safeguarding procedures immediately. This may include referral to children's social care and/or the police.

8. Equality, SEND and vulnerable pupils

Hartlepool Free School is committed to anti-discriminatory practice. We recognise that some pupils are more vulnerable to bullying and may face additional barriers to reporting it.

Particular consideration will be given to pupils who:

- have SEND, autism, ADHD, SEMH needs, communication needs, disabilities or health conditions;
- are looked after or previously looked after;
- have or have had a social worker;
- are young carers;
- are LGBTQ+ or perceived to be LGBTQ+;
- are gender questioning;

- experience racism, religious discrimination or cultural discrimination;
- have English as an additional language;
- are experiencing poverty, family stress or housing instability;
- attend alternative provision;
- are frequently absent or at risk of missing education;
- are at risk of exploitation, radicalisation or serious violence.

Staff must not assume that distress, dysregulation, withdrawal, aggression, injury, anxiety or school avoidance is simply part of a pupil's SEND or SEMH profile. Bullying must always be considered as a possible factor.

Reasonable adjustments will be made where needed. The SENCO and DSL will work together where bullying involves SEND and safeguarding concerns.

9. Alignment with the Promoting Positive Behaviour Policy

This policy works alongside the Promoting Positive Behaviour Policy.

Our anti-bullying approach reflects the following principles:

- **Behaviour is communication**

  Staff will seek to understand what behaviour is communicating, while making clear that bullying and harmful behaviour are not acceptable.

- **Safety is paramount**

  The immediate priority is to protect pupils, reduce risk and restore safety.

- **Ready to Learn**

  Pupils need to feel physically, emotionally and psychologically safe before they can learn. Anti-bullying work supports pupils to feel safe, secure and ready to learn.

- **Safe Students**

  Pupils are taught to make safe choices, communicate safely, listen to staff, be safe friends, use the internet safely and behave safely in school and the community.

- **Zones of Regulation**

  Staff will use Zones language to help pupils identify emotions, understand triggers, regulate safely and reflect on the impact of behaviour.

- **Thrive and PACE**

  Staff will use relational and trauma-informed approaches, including attunement, validation, containment, soothing, curiosity and empathy, while maintaining clear expectations.

- **CASS Plans**

  Where bullying involves a pupil with ongoing needs or repeated patterns, their CASS Plan may be reviewed to ensure consistent adult responses, regulation strategies, risk reduction and support.

Graduated response

Anti-bullying work follows the school's graduated response:

- **Universal:** whole-school culture, values, curriculum, Safe Students, Ready to Learn, supervision, online safety, Zones and Thrive-informed practice.
- **Targeted:** additional support for pupils involved in repeated conflict, bullying, peer difficulties, emotional regulation difficulties or social communication needs.
- **Specialist:** external agency involvement, risk assessment, CAMHS, social care, educational psychology, alternative provision review or multi-agency planning where concerns are serious, persistent or safeguarding-related.

10. Roles and responsibilities

Trust Board

The Trust Board will approve and review this policy, hold leaders to account for implementation, and receive appropriate anonymised information about bullying, prejudice-based incidents, safeguarding trends and impact.

Principal and senior leaders

The Principal and senior leaders will ensure the policy is implemented consistently, staff are trained, pupils are supported, patterns are reviewed, and bullying is addressed through safeguarding, behaviour, pastoral and curriculum systems.

DSL

The DSL will lead where bullying raises safeguarding concerns, ensure accurate recording on CPOMS, oversee risk assessments and support plans, make referrals where needed, and monitor patterns of child-on-child abuse, online harm and prejudice-based incidents.

SENCO

The SENCO will advise where bullying involves pupils with SEND, ensure reasonable adjustments are considered, and support staff to review EHCP provision, Student Profiles, CASS Plans and communication needs.

All staff

All staff must model respectful behaviour, challenge bullying and discriminatory language, listen to pupils, record concerns, report safeguarding concerns, and support pupils to use safe reporting routes.

Staff must not dismiss bullying as banter, force unsafe mediation, promise confidentiality, blame the victim, delay action, or treat SEND/SEMH as a reason to ignore harmful behaviour.

Pupils

Pupils are expected, where developmentally appropriate, to treat others with kindness and respect, follow the Safe Students expectations, report bullying, use technology responsibly, and take responsibility for their actions.

Parents and carers

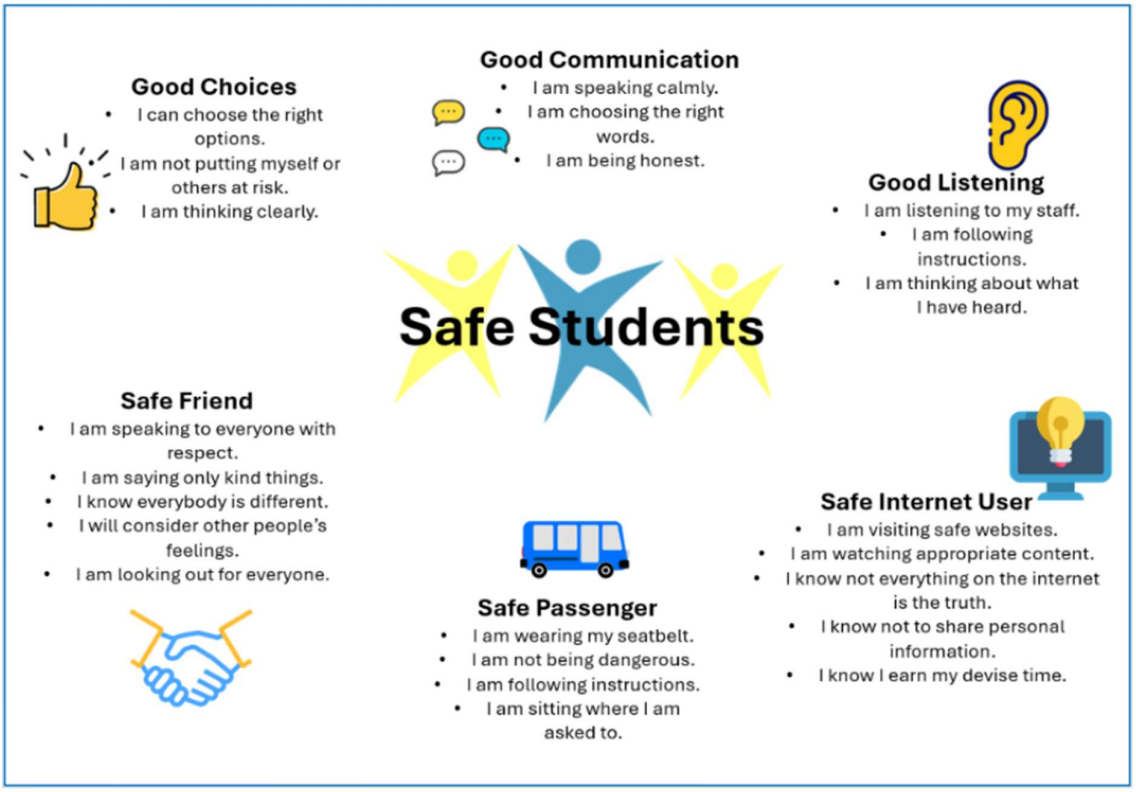
Parents and carers are expected to report concerns promptly, work constructively with school, support safe online behaviour, attend meetings where needed, and avoid approaching other pupils or families directly.

11. Prevention

The school prevents bullying through:

- clear behaviour expectations;
- Ready to Learn routines;
- strong supervision;
- explicit teaching of Safe Students;
- pupil voice;
- targeted support for vulnerable pupils;
- staff training;
- trusted adult relationships;
- anti-bullying themes and awareness work;
- reviewing risk areas such as corridors, toilets, outdoor spaces, transport, online spaces, clubs and social times.
- PSHE, RSE and online safety education;
- teaching about consent, boundaries, equality, discrimination and healthy relationships;
- restorative and reflective work;
- early intervention when peer relationships become unhealthy;
- monitoring CPOMS, behaviour and safeguarding data;

Safety is paramount and we expect our students to be Safe Students:



12. Reporting bullying

Pupils can report bullying to:

- their trusted adult or safe person;
- any member of staff;
- pastoral team;
- Principal or Deputy Principal;
- tutor;
- DSL or Deputy DSL;
- SENCO;
- parent or carer.

Reports may come from the victim, a friend, parent/carer, staff member, other professional, online monitoring, behaviour records, observation or changes in a pupil's presentation.

Pupils do not need to use the word "bullying" for staff to act.

Staff will be alert to signs such as withdrawal, distress, dysregulation, school avoidance, self-harm comments, loss of belongings, injuries, friendship changes, reluctance to use certain spaces, online changes or increased anxiety.

13. Responding to bullying

When bullying is reported or suspected, staff will:

1. Listen calmly.
2. Reassure the pupil that they have done the right thing.

3. Avoid leading questions and victim-blaming.
4. Check immediate safety.
5. Record the concern on CPOMS.
6. Inform the DSL where there is any safeguarding concern.
7. Inform pastoral or senior staff in line with school systems.
8. Maintain confidentiality and share only with those who need to know.

The school will then respond proportionately by:

- speaking to pupils separately;
- considering witnesses and previous records;
- reviewing online evidence safely;
- considering safeguarding, SEND, equality and contextual factors;
- contacting parents/carers where appropriate;
- putting support in place for the victim;
- using sanctions and interventions where appropriate;
- reviewing CASS Plans or risk assessments where needed;
- making referrals to external agencies where required;
- monitoring to ensure bullying has stopped.

14. Supporting the pupil who has been bullied

Support will be based on the pupil's needs, wishes, age, development, communication needs and vulnerability.

Support may include:

- a named safe adult;
- regular check-ins;
- safe spaces;
- increased supervision;
- changes to seating, groups, timetable, social time or transport arrangements;
- pastoral or Thrive support;
- SENCO input;
- CASS Plan review;
- online safety advice;
- safety planning;
- Early Help, CAMHS or social care referral where appropriate;
- restorative work only where safe, appropriate and wanted by the victim;
- follow-up monitoring.

The victim will not be made to feel responsible for the bullying. Protective actions will be explained as safety measures, not punishments.

15. Responding to the pupil who has displayed bullying behaviour

Pupils who display bullying behaviour will be held accountable in line with the Promoting Positive Behaviour Policy.

The school will also consider what the behaviour may be communicating, including unmet SEND needs, SEMH needs, trauma, peer pressure, exploitation, social misunderstanding, sensory overload, low self-worth, emotional dysregulation or harmful online influences.

Responses may include:

- reflective or restorative work;
- direct teaching about impact, empathy and safe relationships;
- Zones of Regulation work;
- Thrive or pastoral intervention;
- mentoring;
- parent/carer meeting;
- CASS Plan review;
- risk assessment;
- increased supervision;
- changes to groups, seating or social arrangements;
- reduced access to privileges, resources, break-times, trips, computers or reward activities where safety requires it;
- SLT intervention;
- suspension or permanent exclusion in the most serious cases;
- referral to external agencies where appropriate.

Restorative work will not replace sanctions where sanctions are needed. It will only take place when safe and will not pressure the victim.

16. Online bullying and mobile technology

Online bullying is treated as seriously as face-to-face bullying.

The school may respond to online bullying that happens outside school where it affects pupil safety, wellbeing, school relationships, learning or the orderly running of the school.

Online bullying may be addressed through safeguarding procedures, behaviour sanctions, online safety education, parent/carer support, mobile phone procedures, platform reporting, filtering and monitoring systems, or police advice.

Staff must not view, copy, save, forward or print nude, semi-nude or sexual images. Any concern involving nude or semi-nude images must be reported immediately to the DSL.

AI-generated bullying, impersonation, deepfakes, sexualised content or harmful edited images will be treated seriously under this policy, the Online Safety Policy, the Behaviour Policy and the Safeguarding Policy.

17. Sanctions

Sanctions will be proportionate and used in line with the Promoting Positive Behaviour Policy.

Sanctions will consider:

- safety and risk;
- the impact on the victim;
- the seriousness and frequency of the behaviour;
- intent and understanding;
- age and developmental stage;
- SEND and SEMH needs;
- whether the behaviour is discriminatory, sexual, violent, threatening or online;
- the need to protect the wider school community.

The school has a strict non-negotiable stance on:

- racism;
- homophobia;
- gender identity-based abuse;
- disability-based abuse;
- bullying;
- physical assault;
- sexual harassment;
- sexual violence;
- discriminatory abuse.

Sanctions will be used as learning opportunities wherever possible, while ensuring pupils are safe and harm is addressed.

18. Recording, monitoring and Ofsted-ready evidence

All bullying concerns must be recorded clearly and promptly on CPOMS.

Records should include:

- what happened;
- who was involved;
- date, time and location;
- whether it was online, offline or both;
- any protected characteristic or prejudice element;
- safeguarding concerns;
- actions taken;
- support offered;
- sanctions or interventions;
- parent/carer contact;
- referrals made;
- review arrangements;
- rationale for key decisions.

Leaders will review bullying information to identify:

- repeat victims;
- repeat pupils causing harm;
- locations or times of concern;
- online platforms involved;
- vulnerable groups;
- SEND patterns;
- links with attendance, behaviour and safeguarding;
- curriculum or staff training needs;
- supervision or environmental risks;
- whether bullying stopped following intervention.

Evidence may include CPOMS records, behaviour data, safeguarding chronologies, pupil voice, parent/carer communication, curriculum plans, assemblies, staff training records, CASS Plan reviews, risk assessments, governor reports and records of actions taken following trends.

19. External agency involvement

The school may involve external agencies where bullying is serious, persistent or safeguarding-related.

This may include:

- children's social care;
- Early Help;
- educational psychology;
- Prevent/Channel;
- local authority attendance services;
- social workers;
- other schools or settings.
- police;
- CAMHS;
- SEND services;
- youth services;
- alternative provision providers;
- Virtual School Head;

A referral to children's social care and/or police will be considered where a child is suffering, has suffered, or is likely to suffer harm, or where a criminal offence may have occurred.

20. Complaints

Parents/carers who are unhappy with the school's response to bullying should raise this with the school in the first instance.

Where concerns remain unresolved, they may use the school's Complaints Policy.

Safeguarding concerns should be raised immediately with the DSL, Deputy DSL, Principal, CEO or children's social care, depending on the nature and urgency of the concern.

21. Training

All staff will receive safeguarding and behaviour training relevant to bullying, child-on-child abuse, online safety, equality and SEND.

Training will include:

- recognising and responding to bullying;
- sexual harassment and sexual violence;
- prejudice-based incidents;
- safeguarding thresholds;
- Ready to Learn;
- Zones of Regulation;
- CASS Plans;
- de-escalation and trauma-informed responses.
- child-on-child abuse;
- cyberbullying;
- SEND vulnerability;
- CPOMS recording;
- Safe Students;
- Thrive and PACE;
- restorative practice;

New staff will be made aware of this policy as part of induction.

22. Linked Policies

- Child Protection and Safeguarding Policy;
- Promoting Positive Behaviour Policy;
- Online Safety Policy;
- Mobile Phone Policy;
- Equalities Policy;
- SEND Policy;
- RSE/PSHE Policy;
- Attendance Policy;
- Complaints Policy;
- Staff Code of Conduct;
- Suspension and Exclusion Policy;
- Restorative Practice Policy.

23. Review

This policy will be reviewed annually by the DSL and senior leaders and approved by the Trust Board.

The review will consider bullying records, safeguarding records, behaviour data, attendance data, pupil voice, parent/carer feedback, staff feedback, complaints, SEND patterns, protected characteristic data, online safety trends, local safeguarding themes and Ofsted expectations.

Appendix 1: Anti-bullying response flowchart

