



ANTI-BULLYING (COUNTERING BULLYING) POLICY

This policy, which applies to the whole school, including the Reception class within the Early Years Foundation Stage (EYFS), is publicly available on the school website and upon request a copy (which can be made available in large print or other accessible format if required) may be obtained from the School Office.

Document Details:

Scope: All who work, volunteer or supply services to our school have an equal responsibility to understand and implement this policy and its procedures both within and outside of normal school hours, including activities away from school. All new employees and volunteers are required to state that they have read, understood and will abide by this policy and its procedural documents and confirm this by signing the *Policies Register*. This policy applies to all provision delivered by Imperial Oak School, including any alternative provision or off-site settings operating under the school's oversight.

Legal Status: Complies with The Education (Independent School Standards) (England) Regulations currently in force.

- Behaviour in schools - Advice for headteachers and school staff (DfE, 2022)

Monitoring and Review: These arrangements are subject to continuous monitoring, refinement, and audit by the Headteacher. The Proprietor and Advisory Board will undertake a full annual review of this document, inclusive of its implementation and the efficiency with which the related duties have been implemented. This review will be formally documented in writing. Any deficiencies or weaknesses recognised in arrangements or procedures will be remedied immediately and without delay. All staff will be informed of the updated/reviewed arrangements and it will be made available to them in writing or electronically.

Signed:

Reviewed: April 2026

Next Review: April 2027

Mrs Chizzy Chukwukere
Executive Head of School
Proprietor, who is the Chair of the Advisory Board

Statement of Intent: We aim to create an environment where individuals can grow and flourish without fear. Each child has the right to be happy and safe in school and to be protected when they are feeling vulnerable. We have a duty of care to those in our charge and all members of our community need to be alert to signs of bullying behaviour. Bullying is unacceptable at our school. We do all we can to prevent it, by developing a School ethos in which bullying is regarded as unacceptable. We aim to make all those connected with the School aware of our opposition to bullying, and we make clear each person's responsibilities with regard to the minimisation of bullying in our School. If bullying does occur, all children should be able to tell and know that incidents will be dealt with promptly and effectively. We are a *TELLING School*. This means that anyone who knows that bullying is happening is expected to tell the staff. Posters to this effect are displayed in the school. All adult members of our school community, whether staff, parent, or volunteer, should be vigilant, recognising where bullying is taking place, and deal with it thoroughly and with sensitivity.

As a SEND school, we recognise that some pupils may be more vulnerable to bullying or may display behaviours linked to their needs. Staff are trained to understand behaviour as communication and to respond in a supportive and structured way.

Definition of Bullying: Bullying is behaviour by an individual or group, that "intentionally hurts another pupil or group physically or emotionally and is often motivated by prejudice against particular groups, for example, on grounds of race, religion, culture, sex, gender, homophobia, special educational needs and disability, or because a child is adopted or is a carer – it may occur directly or through cyber-technology (social websites, mobile

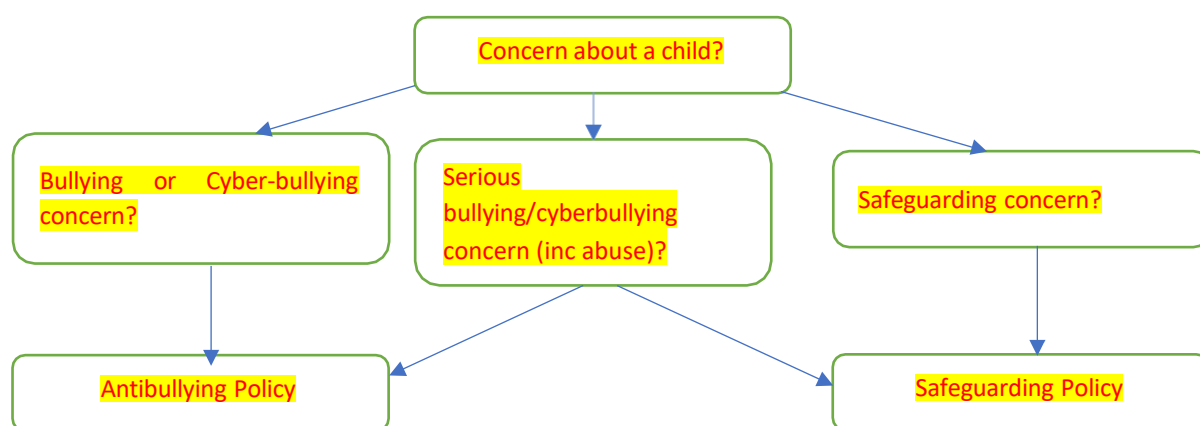
phones, text messages, photographs and email).” Stopping violence and ensuring immediate physical safety is obviously a school's first priority but emotional bullying can be more damaging than physical; (Preventing and Tackling Bullying 2017).

Bullying is an extremely serious matter. It can cause psychological damage and even lead to suicide. It should be borne in mind that criminal laws may be invoked in cases of harassment and threatening behaviour. Peer on peer abuse is a focus of more recent editions of Keeping Children Safe in Education and is considered central to this Anti-Bullying Policy. While a clear focus of child-on-child abuse is around sexual abuse and harassment, physical assaults and initiation rituals and/or violence from pupils can also be abusive. These are equally not tolerated at Imperial Oak and will be treated both as a safeguarding matter and will give rise to disciplinary action. If it is believed that a crime has been committed, it will be reported to the police. A bullying incident should be treated as a child protection (safeguarding) concern where there is "reasonable cause to suspect that a child is suffering or likely to suffer significant harm." In this case, all of the safeguarding procedures are invoked, including submitting an initial concern form to the DSL, who will action the report in accordance with the school's Safeguarding (Child Protection Policy) the LADO will advise on escalation of the case and the involvement of the Police and /or Children's Social Care.

A Potentially Criminal Activity: Though bullying in itself is not a specific criminal offence in the UK, it is important to bear in mind that some types of harassing or threatening behaviour - or communications - could be a criminal offence, for example under the Protection from Harassment Act 1997, the Malicious Communications Act 1988, the Communications Act 2003, and the Public Order Act 1986. If as a school, we feel that an offence may have been committed we would seek assistance from the police.

Bullying – Child Protection Related Issues: A bullying incident is treated as a child protection concern when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. In such cases the school reports its concerns to the Southwark Safeguarding Children’s Partnership on 020 7525 1921 during office hours or the out-of-hours Duty Team (evenings and weekends) on 020 7525 1921. Any kind of bullying is unacceptable. (Please refer to our Safeguarding Child Protection Policy for more details).

Concerns flow chart: In accordance with KCSIE (DfE: 1st Sept 2023), the main placement and details regarding Cyberbullying are now embedded within our Anti-Bullying policy. This is because how it is responded to, will align with all other types of bullying (unless there are specific safeguarding concerns, which refers back to the Safeguarding (Child Protection) Policy).



In our Online Safety Policy, reference is made to Cyber-bullying (e.g. the definition and that our response is inline with our Anti-bullying policy) which then signposts to our main antibullying policy.

Bullying can be:

- Emotional (indirect bullying) - being unfriendly, excluding, tormenting (e.g. hiding books, threatening gestures), deliberately excluding from social groups or an activity, or malicious rumors, e-mails or text messages (visual image

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abuse - real or manipulated images)

- Physical or intimidating behaviour, including actions that may cause fear, distress, or harm to another pupil.
- Physical harm or its threat - pushing, kicking, hitting, taking or hiding belongings, punching or any use of violence; deliberately destroying or damaging work or possessions or removing property
- Cyber-Bullying – not occurring face to face but rather through electronic means including, but not limited to, social networking sites, internet and intranet sites, email, instant messaging, by mobile phone including through text messages and phone calls, photographs both real and manipulated etc
- Racist - racial taunts, graffiti, gestures
- Cultural – focusing on and/or playing off perceived cultural differences etc.
- Sexist – covers a wide range of behaviour from name calling to physical sexual assault. It is the use of sexual language or negative stereotyping on the basis of gender
- Sexual - unwanted physical contact or sexually abusive comments
- Homophobic - This is bullying which is directed towards people who are openly gay, bisexual, transgender, are perceived as gay, or show characteristics (heterosexual young people subject to homophobic bullying are less reluctant to report it as this may enforce the stereotypical way that they are already viewed by others so sensitivity and positive support is required for victims)
- Transgender – bullying children who are considering going through, are going through or have gone through, gender reassignment
- Religious - Attacking faith, belief, religious practice or custom
- Disability - remarking upon, drawing attention to, or discriminating against persons with disability including mental disability or learning difficulties
- Verbal - name-calling, sarcasm, spreading rumors, teasing
- Written – on paper
- Discriminatory bullying of protected characteristics under the Equality Act 2010 including pregnancy and maternity, marriage and civil partnership

Bullying can take place:

- between pupils;
- between pupils and staff;
- by individuals or groups;
- face to face, indirectly or using a range of cyberbullying methods.

We believe that all children and staff should be able to work and play without any fear of being bullied by any other person. Bullying is not tolerated and all accusations are to be taken seriously and dealt with. Bullying can take place between pupil and pupil, staff and staff or staff and pupil. We consider the pastoral care of the staff and children to be of prime importance. In class this role largely rests with the class teacher. It is school policy that any misdemeanour will be dealt with by the member of staff present when it occurs, whether in the playground, classroom, cloakroom or any part of the School. A common code of behaviour is expected from everyone in the School (see Behaviour Policy). All staff and volunteers at the school are expected to treat each other with a professional level of respect.

We have clear procedures to follow including who to tell and how to record bullying to enable patterns to be identified. We raise the awareness of staff through training, so that the principles of the school policy are understood, legal responsibilities are known, action is defined to resolve and prevent problems and sources of support are available. We take action to reduce the risk of bullying at times and in places where it is most likely. We invest in specialised skills to understand the needs of the children, including those with special educational needs or disabilities, and ‘lesbian, gay, bisexual and transgender’ (LGB&T) pupils.

Signs and Symptoms: A child may indicate by signs or behaviour that he or she is being bullied. Adults should be aware of these possible signs and that they should investigate if a child:

is frightened of walking to or from school	attempts or threatens suicide or runs away
doesn't want to go on the school / public bus	cries themselves to sleep at night or has nightmares

begs to be driven to school	feels ill in the morning
changes their usual routine	begins to do poorly in school work
is unwilling to go to school (school phobic)	comes home with clothes torn or books damaged
begins to truant	has possessions which are damaged or "go missing"
becomes withdrawn anxious, or lacking in confidence	asks for money or starts stealing money (to pay bully)
starts stammering	has dinner or other monies continually "lost"
has unexplained cuts or bruises	is bullying other children or siblings
becomes aggressive, disruptive or unreasonable	stops eating
is frightened to say what's wrong	gives improbable excuses for any of the above
is afraid to use the internet or mobile phone	is nervous & jumpy when a cyber message is received

These signs and behaviours could indicate other problems, but bullying should be considered a possibility and should be investigated. Children are encouraged to share their concerns with the adults responsible for them. Staff will consult with the Headteacher or other Senior Management knowing that their response will be sympathetic and appropriate.

The Role of Pupils: If any pupil is being bullied or someone who is being bullied is identified, they should report what is happening to someone else. If they feel uncertain about taking this step they may want to talk first informally to:

- Their parents
- Pupils should report concerns to a trusted adult in school, including their class teacher, teaching assistant, or a member of the senior leadership team.
- Childline (0800 11 11)

All of these people will be happy to listen and help. We share this information regularly with our pupils through assemblies, class discussions and our PSHEE curriculum.

Reporting a bully does NOT count as 'telling tales'.

Bullying can only be stopped if someone is told.

Everyone has an important duty to help stop bullying, even as a bystander.

What Should the Pupils Tell an Adult?

Who has been bullying you?

How long has this been going on?

How many times has this happened to you?

Has anyone seen this happen? If so, who?

Has anyone else been bullied by the same person?

Have you told anyone else about this before?

Was anything done about it?

Have you done anything unhelpful that has not helped the situation?

What Should Parents Do About Bullying? Inform the School if they think their child is being bullied or is bullying other children. Try to establish the facts and keep an open mind. The symptoms at home of children being bullied or who are bullying can sometimes be very similar. With older children it might be useful to refer to this policy and the Home-School Agreement. Parents who are concerned that their child is being bullied or bullying, should contact their child's class teacher or the Headteacher immediately. Parents have a responsibility to support the school's anti-bullying policy and to actively encourage their child to be a positive member of the school.

Why is it Important to Respond to Bullying? Bullying hurts. No one deserves to be a victim of bullying. Everybody has the right to be treated with respect. Bullying children need to learn different ways of behaving. The School has a responsibility to respond promptly and effectively to issues of bullying. Bullying is an extremely serious matter. It can cause psychological damage and even lead to suicide. It is worth remembering that in certain cases bullying can constitute harassment and threatening behaviour and as such is in principle subject to criminal sanctions, demonstrating how serious it is. Pupils who are bullying need to learn different ways of behaving. We have a responsibility to respond promptly and effectively to issues of bullying. Handling of a bullying incident is given much thought to ensure that the facts are fully known, agreed and understood by the bully(/ies) and the victim(s). All children in our school will be informed about bullying. They will be made aware that we are a 'telling school' they must tell an adult if they or someone else is being bullied and that this is not telling tales. Children will be encouraged to talk to their class teacher, Headteacher, support staff or parents.

The Role of the Headteacher: The Headteacher supports the staff in minimising bullying in our School. All Incidents of bullying are taken very seriously and dealt with appropriately. The Headteacher monitors bullying and reviews the school policy regularly. The Headteacher keeps records as required. The Headteacher implements the School anti-bullying strategy and ensures that staff are aware of the policy and know how to deal with bullying. The Headteacher ensures that all children know that bullying is wrong, and that it is unacceptable. The Headteacher ensures that staff receive sufficient training to deal with bullying. The Headteacher sets the school climate of mutual support and praise for success. When children feel they are important and belong to a friendly and welcoming school, bullying is less likely.

Upskirting: In 2019 the Voyeurism Offences Act came into force and made the practice of upskirting illegal. Although we do not permit pupils to have mobile phones at school, and only digital cameras with express permission, we must ensure we are alert to the possibility that this could happen here. Upskirting is defined as someone taking a picture under another person's clothing without their knowledge, with the intention of viewing their genitals or buttocks, with or without underwear. The intent of upskirting is to gain sexual gratification or to cause the victim humiliation, distress or alarm. These are forms of bullying. If this is between pupils, we will follow the child-on-child abuse procedure. If staff in the school are made aware that upskirting has occurred, then this will be treated as a sexual offence and reported accordingly. It is a safeguarding concern and must be reported to the DSL immediately. There are behaviours that would be considered as sexual harassment which may be precursors to upskirting. The use of reflective surfaces or mirrors to view underwear or genitals will not be tolerated and the school will respond to these with appropriate disciplinary action and education.

Pupils who place themselves in positions that could allow them to view underwear, genitals or buttocks, will be moved given appropriate guidance about their behaviour. Parents may be informed. Repeat offenders will be disciplined. These locations could include stairwells, under upper floor walkways, outside changing areas and toilets or sitting on the floor or laying down in corridors. If technology that is designed for covert placement and could be used to take upskirting or indecent images is discovered in the school, it will be confiscated. If the technology is in location and potentially may have captured images, this will be reported to the police and left in situ so that appropriate forensic measures can be taken to gather evidence. Any confiscated technology will be passed to the Headteacher to make a decision about what happens to the items and will be carried out under the principles set out in the government guidance on searching, screening and confiscation. If the image is taken on a mobile phone, the phone will be confiscated under the same principles. This may need to be passed to the police for them to investigate, if there is evidence that a crime has been committed.

Prevent, Channel and FGM: An element of peer coercion (a form of bullying) may be present in attempts to radicalise

pupils, this may present as cyber-bullying, through use of the internet and social media. In this circumstance the school would consider the involvement of Channel, and report to the police and appropriate bodies as detailed in the Safeguarding (Child Protection) Policy. There may be an element of peer coercion involved in FGM, with a similar cyber-bullying dimension, and staff should also follow all of the relevant safeguarding processes.

The School's Aims with Regard to Bullying:

- To make clear to children, staff, parents and guardians that bullying is unacceptable.
- To encourage openness in which children, staff and parents act immediately if there is any suspicion of bullying.
- To provide a clear framework for dealing with incidents of bullying.
- To educate children in resisting bullying.
- To support those being bullied and a framework within which those bullying others may recognise and reform their behaviour.
- To instill in all members of the school community a sense of caring and kindness for one another in accordance with the school's ethos.
- To ensure that as a result of staff being respectful towards children at all times, children will internalise and model these human encounters and thus treat each other respectfully.
- To ensure that the adults in the children's world do not endeavor to diminish children so that they lose respect amongst their peer group but rather enhance them, so as to continue to develop their self-esteem.
- To promote a transparency in human relationships so that children, by default, are held to account for the feelings they may evoke in others.
- Pupils who report bullying incidents involving their peers will be reassured that they have taken the correct action and that no repercussions will result.

All staff must be alert to the signs of bullying. These could include:

- Verbal taunts;
- Children sitting on their own;
- Children being left out of activity groups during lessons;
- Reluctance to come to school or take part in activities.

Teachers are encouraged to adopt the following responses:

- We watch for early signs of distress in children.
- We listen, believe and act when a child tells us that he or she is being bullied.
- We intervene to stop the child who is bullying from harming the other child or children.
- We explain to the child doing the bullying why his or her behaviour is unacceptable.
- We give reassurance to the child or children who have been bullied.
- We help the child who has done the bullying to recognise the impact of his or her actions.
- We talk privately with the offending individual(s);
- We intervene to defuse a blatant act of bullying.

SEND and Cared For Children: AS we are a SEND school we are particularly aware of the need to support these children, who may be particularly vulnerable in situations where bullying takes place. In particular we will ensure that they understand what to do if they feel they are being bullied and enable them to express their concerns if their communication skills make it difficult for them to do so.

Reporting: All cases of bullying, or suspected bullying, should be referred to the Headteacher or a member of the Senior Leadership Team.

The Headteacher is responsible for coordinating and monitoring the response to a bullying incident and will arrange support and review processes. Information regarding bullying incidents be monitored and feedback will be given to specific staff as appropriate, and more broadly during staff training. The Headteacher also monitors behaviour and any cases of bullying to enable patterns to be identified and effective responses planned.

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Sanctions may include withdrawal from favoured activities or loss of freetime and are broadly in line with the scale of sanctions. If bullying persists, the parents of the perpetrator and victim are called to discuss the situation with the Headteacher. In rare cases, children who bully repeatedly may be excluded.

Anti-Bullying Strategies Adopted by this School:

- Acknowledges the problem. Bullying happens everywhere in our society, including the staff-room.
- Asking children what they feel constitutes bullying. Discussions about what is and is not bullying can help form the basis for the school's anti-bullying policy.
- Has a whole school approach in which children, staff and parents work together to create an environment where bullying is not tolerated.
- We involve our pupils in anti-bullying activities within the classroom through our PSHEE Curriculum (including assemblies, projects, drama and the discussion of differences between people and the importance of avoiding prejudice-based language.
- Imperial Oak School finds ways to help those who are bullying change their behaviour. Punishing bullies doesn't end bullying. It is important to stress that it is the behaviour that is not liked, rather than the person.
- Support schemes that encourage children to make friends. Having friends is one of the best defences against bullying, but not everyone has the right social skills to make friends easily. Teaching assertiveness skills and confidence-building to the class may be a way to help children make friends.
- There are strategies for introducing new children to Imperial Oak School.
- We involve our pupils in anti-bullying activities within the classroom. Using these educational elements, we discuss differences between people and the importance of avoiding prejudice-based language.
- In the early years, opportunities arise during child-initiated activities for staff to model: how to negotiate and deal with conflict, what to do if a friend is upset and what to do if you have upset someone.

ICT: The teachers are responsible for educating the pupils in the safe use of IT as part of the Anti-bullying Strategy. The school provides a filtered Internet service, and pupils are taught and encouraged to be responsible and aware when accessing Internet resources. Discussion on cyberbullying reinforces that cyberbullying by any member of the school community is not tolerated. Rules for Internet access are posted in all rooms where computers are used.

Training: The DSL has attended CEOPS training Missing the Exploitation which dealt with child sexual exploitation and online bullying. Safeguarding training, including anti-bullying is cascaded to staff when the DSL and DDSL attend courses. Staff are reminded at staff meetings about anti-bullying procedures and contribute to reviews of incidents. Our staff keep up to date with online safety through our in-house training and updates.

Liaison: We liaise with other schools, the police, parents, CAMHS, Children's Social Care, Scallywags and other outside agencies, to minimise the risk of bullying in the wider community and involve these parties if bullying occurs.

Monitoring: The Proprietor with responsibility for Safeguarding monitors the implementation of the Anti-bullying Policy. They speak to staff and pupils on his regular visits to ensure that they understand what to do if bullying occurs this is part of their wider duty as Safeguarding monitor.

Cyber-bullying:

Cyberbullying (or online bullying) is bullying using technologies, particularly over the internet or via mobile and gaming networks. (ChildNet) Cyber-bullying is a different form of bullying that can happen 24/7, with a potentially bigger audience, and more accessories as people forward on content at a click. Wider search powers included in the 2011 Education Act give

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schools stronger powers to tackle cyber-bullying by providing a specific power to search for and, if necessary, delete inappropriate images (or files) on electronic devices, including mobile phones.

Here are some examples of cyber-bullying:

- **Text message bullying** – sending unwelcome texts that are threatening or cause discomfort.
- **Picture/video clip bullying via mobile phone cameras** or webcam, including Upskirting including sending or posting messages or images of the victim without their explicit consent.
- **Phone call bullying** – can include silent calls or abusive messages. Sometimes the bullied person's phone is stolen and used to harass others, who then think the phone owner is responsible.
- **Email bullying** – sending bullying or threatening messages, often using someone else's name to pin the blame on them.
- **Chat room bullying** – involves sending menacing or upsetting responses to children or young people when they are in a web-based chat room.
- **Bullying through instant messaging (IM)** – where children and young people are sent unpleasant messages as they conduct real-time conversations on line.
- **Bullying via social networking websites** – includes the insulting blogs, personal websites and online personal polling sites. There has also been a significant increase in social networking sites for young people, which can provide new opportunities for cyber-bullying (Facebook, Instagram, Twitter, Snapchat, etc).
- **Sexting** (also called youth-generated sexual imagery) – young people (under 18) who share sexual imagery of themselves, or peers, are breaking the law. There is, unfortunately, scope for this fact to be exploited as bullying.

Cyberbullying differs from "ordinary" bullying and can have a far greater impact because of a number of factors including:

- invasion of personal space – the victim can never escape it;
- the potential anonymity of the bully;
- The ability to broadcast upsetting messages and images rapidly to a potentially huge audience and to continue to do so repeatedly over a long period of time;
- Other pupils, who may not normally become involved in bullying behaviour, may be drawn in unwittingly by, for example, forwarding or circulating an image or message.

Responding to Cyber-Bullying: If the school were to find that a member of the school community was involved in cyber-bullying, our approach would follow the same procedures as the other types of bullying identified, including our child protection procedures where appropriate. This may include working with the police in serious cases.

Online Forms of Abuse (Also see our Safeguarding Child Protection Policy): Information and communication technology (ICT)-based forms of child physical, sexual and emotional abuse can include bullying via mobile telephones or online (internet) with verbal and visual messages. This can also include child sexual abuse. All staff are alert to the signs that a child may be at risk of may have been abused online and will follow the school's child protection procedures (Please see our Child Protection Policy for more details).

Prejudice-Based and Discriminatory Bullying (because of a protected characteristic): This is defined in Preventing and Tackling Bullying (July 2017) as bullying related to an individual or group 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. Any bullying on the basis of protected characteristics is taken particularly seriously.

Anti-Bullying Code

Principles: Every person has the **RIGHT** to feel secure and happy at Imperial Oak School. Our School Community will not tolerate any unkind actions or remarks. Any unkind actions or comments will be called bullying.

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- No child should suffer verbal abuse.
- No child should suffer physical violence.
- No child should feel victimised by another.
- No child should feel excluded from activities.
- Every child has a **RESPONSIBILITY** to ensure that harassment is not tolerated.
- Every child is **ENTITLED** to the respect of others.
- Staff guarantee to take bullying seriously and deal with each incident appropriately and discreetly.
- Persistent offenders may be excluded, in extreme cases, permanently.
- Bullying is one aspect of behaviour which causes hurt and anxiety to children.
- Bullying is an issue which often causes parents concern.
- A child is considered to be a bully if she/he knowingly commits unkind acts towards another individual.
- Bullying may include:-
 - Physical harm or threat of physical harm.
 - Destroying, damaging or hiding property.
 - Spreading rumours.
 - Name calling or teasing.
 - Deliberately excluding someone from an activity.

Although bullying implies intent, accidental incidents of this sort are to be taken seriously, requiring appropriate educational responses

Further resources:

Some excellent resources are to be found in the following locations:

Childline: 0800 1111

National Society for the Prevention of Cruelty to Children (NSPCC): 0800 800 5000

Samaritans: 116123

National Bullying helpline: 0300 323 0169

- The Anti-Bullying Alliance. Founded by NSPCC and National Children's Bureau, the Anti-Bullying Alliance (ABA) brings together over 100 organisations into one network to develop and share good practice across the whole range of bullying issues. <http://www.antibullyingalliance.org.uk/>
- Childnet International. Particular expertise and guidance on internet safety and cyber-bullying prevention <https://www.childnet.com/>
- Kidscape. Charity established to prevent bullying and promote child protection providing advice for young people, professionals and parents about different types of bullying and how to tackle it. They also offer specialist training and support for school staff, and assertiveness training for young people. <http://www.kidscape.org.uk/>
- The Bullying Intervention Group (BIG): offer a national scheme and award for schools to tackle bullying effectively. <https://www.bullyinginterventiongroup.com/what-is-it/>
- Stand up to Bullying offers advice for parents and children about dealing with bullying. www.standuptobullying.co.uk
- Cyberbullying Research Center www.cyberbullying.org
- Bullying UK www.bullying.co.uk