Anti-Bullying Policy

Shrewsbury School

September 2026

Contents

1 Aims 3
2 Scope and application 3
3 Regulatory framework 3
4 Responsibility statement and allocation of tasks 5
5 Publication and availability 5
6 Definitions 5
7 Bullying 6
8 Anti-bullying culture and systems 8
9 Reporting concerns 11
10 Why incidents might not be reported 12
11 Assessment of concerns 13
12 Response to concerns 14
13 Supporting those severely impacted by bullying 15
14 Training 15
15 Risk assessment 16
16 Record keeping 16

Appendix 1: Cyberbullying: guidance for pupils 18

1. Aims

1.1 This is the Anti-bullying policy of Shrewsbury School (**School**).

1.2 The aims of this policy are:

1.2.1 to actively promote and safeguard the welfare of pupils at the School;

1.2.2 to maintain and drive a positive and supportive culture among all pupils and staff throughout the School;

1.2.3 to prevent bullying, detect it when it occurs, and respond to it appropriately on a case-by-case basis; and

1.2.4 to help to promote a whole school culture of openness, safety, equality and protection from all forms of harm and abuse.

1.3 This policy forms part of the School's whole school approach to promoting child safeguarding and well-being, which seeks to involve everyone at the school to ensure that the best interests of pupils underpins and is at the heart of all decisions, systems, processes and policies.

1.4 Although this policy is necessarily detailed, it is important to the school that our policies and procedures are transparent, clear and easy to understand for staff, pupils, parents and carers. The School welcomes feedback on how we can continue to improve our policies.

2. Scope and application

2.1 This policy applies to the whole School.

2.2 This policy applies at all times when the pupil is:

2.2.1 in or at School (to include any period of remote provision);

2.2.2 representing the School or wearing School uniform;

2.2.3 travelling to or from School;

2.2.4 on School-organised trips;

2.2.5 associated with the School at any time; or

2.2.6 in the care of the School or not and the School becomes aware of an incident of bullying.

2.3 This policy shall also apply to pupils at all times and places in circumstances where failing to apply this policy may:

2.3.1 affect the health, safety or well-being of a member of the School community or a member of the public;

2.3.2 have repercussions for the orderly running of the School; or

2.3.3 bring the School into disrepute.

3. Regulatory framework

3.1 This policy has been prepared to meet the School's responsibilities under:

3.1.1 Education (Independent School Standards) Regulations 2014;

3.1.2 *National minimum standards for boarding schools* (Department for Education (**DfE**), September 2022);

3.1.3 Education and Skills Act 2008;

3.1.4 Children Act 1989;

3.1.5 Data Protection Act 2018 and UK General Data Protection Regulation (**UK GDPR**); Data (Use and Access) Act 2025 (DUAA)

3.1.6 Human Rights Act 1998; and

3.1.7 Equality Act 2010.

3.2 This policy has regard to the following guidance and advice:

3.2.1 Keeping children safe in education (DfE, September 2026) (**KCSIE**);

3.2.2 Working together to Safeguard Children 2026 (HM Government)

3.2.3 Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (HM Government, July 2018);

3.2.4 Preventing and tackling bullying: advice for headteachers, staff and governing bodies (DfE, July 2017);

3.2.5 Cyberbullying: advice for headteachers and school staff (DfE, November 2014);

3.2.6 Sexual bullying: developing effective anti-bullying practice (Anti-bullying Alliance)

3.2.7 Sharing nudes and semi-nudes: advice for education settings working with children and young people (DCMS and UKCIS, December 2020)

3.2.8 Searching, screening and confiscation in schools (DfE, July 2023)

3.2.9 Behaviour in schools (DfE, February 2024)

3.2.10 Advice and guidance: how can we stop prejudice based bullying in schools (Equality and Human Rights Commission);

3.2.11 Equality Act 2010: advice for schools (DfE, June 2018);

3.2.12 Relationships education, relationships and sex education and health education guidance (DfE, September 2021).

3.2.13 Mobile phones in schools (DfE, June 2026)

3.3 The following School policies, procedures and resource materials are relevant to this policy:

3.3.1 Pupil behaviour policy;

3.3.2 School's Terms and Conditions

3.3.3 risk assessment policy;

3.3.4 acceptable usage of IT policy;

3.3.5 online safety policy;

3.3.6 child protection and safeguarding policy and procedures;

3.3.7 drugs Policy;

3.3.8 alcohol Policy;

3.3.9 pupil concerns and complaints procedure;

3.3.10 special educational need and disability act (SENDA);

3.3.11 the yellow card; (code of behaviour, expectations, encouragement and sanctions)

3.3.12 relationships education, relationships and sex education policy;

3.3.13 personal and social development policy;

3.3.14 mobile phone policy.

4. Responsibility statement and allocation of tasks

4.1 The Proprietor has overall responsibility for all matters which are the subject of this policy.

4.2 To ensure the efficient discharge of its responsibilities under this policy, the Proprietor has allocated the following tasks:

Task	Allocated to	When / frequency of review
Keeping the policy up to date and compliant with the law and best practice	Deputy Head (Pastoral)	As required, and at least termly
Monitoring the implementation of the policy, relevant risk assessments and any action taken in response and evaluating effectiveness	Deputy Head (Pastoral)	As required, and at least termly
Seeking input from interested groups (such as pupils, staff, parents) to consider improvements to the School's processes under the policy	Deputy Head (Pastoral)	As required, and at least annually
Formal annual review	Safeguarding governors on behalf of the Proprietor	Annually

5. Publication and availability

5.1 This policy is published on the School website.

5.2 This policy is available in hard copy on request.

5.3 A copy of the policy is available for inspection from the Deputy Head (Pastoral) during the School day.

5.4 This policy can be made available in large print or other accessible formats if required.

6. Definitions

6.1 Where the following words or phrases are used in this policy:

6.1.1 References to the **Proprietor** are references to the board of Governors.

6.1.2 References to the **Head** may include deputies.

6.1.3 References to **HSM** means Housemaster or Housemistress as appropriate.

6.1.4 References to **Parent** or **Parents** means the natural or adoptive parents of the pupil (irrespective of whether they are or have ever been married, with whom the pupil lives, or whether they have contact with the pupil) as well as any person who is not the natural or adoptive parent of the pupil, but who has care of, or parental responsibility for, the pupil e.g. legal guardian, education guardian and / or host parent / carer.

7. Bullying

7.1 Bullying is always unacceptable and will not be dismissed as being normal or as "banter", "just having a laugh", "boys being boys" or simply "part of growing up". Bullying will not be tolerated by the School because:

7.1.1 it is harmful to the person who is bullied, to those who engage in bullying behaviour, and those who support them, and can in some cases lead to lasting psychological damage and even suicide;

7.1.2 it interferes with a pupil's right to enjoy their learning and leisure time free from intimidation; and

7.1.3 it is contrary to all our aims and values, our internal culture and the reputation of the School.

7.2 Bullying is behaviour by an individual or group, that intentionally hurts another individual or group either physically or emotionally. Bullying is often motivated by prejudice against particular groups. Bullying may be:

7.2.1 **Physical**: hitting, kicking, pushing people around, spitting, shaking, biting, hair pulling or taking, damaging or hiding possessions;

7.2.2 **Verbal**: name-calling, gossiping, taunting, teasing, insulting, threatening or undermining, humiliating or demanding money;

7.2.3 **Non-verbal abuse**: hand signs or text messages (see also cyberbullying below);

7.2.4 **Emotional abuse:** controlling or manipulating someone, making silent, hoax or abusive calls;

7.2.5 **Exclusionary behaviour**: intimidating, isolating or excluding a person from a group;

7.2.6 **General unkindness**: constant criticism, spreading rumours or writing unkind notes, mobile phone texts or emails;

7.2.7 **Initiation / hazing type behaviour:** rituals which may include but is not limited to activities involving harassment, abuse or humiliation used as a way of initiating a person into a group;

7.2.8 **Low level disruptive behaviour:** where "banter" and "horseplay" over a prolonged period of time;

7.2.9 **Ideology-based bullying:** behaviour influenced by harmful online ideologies, extremist content, misogyny, misandry or online influencers that encourages discrimination, harassment or abuse towards others.

7.2.10 **Cyberbullying:** bullying that takes place using technology. This may include bullying through the use of mobile electronic devices, social media or gaming sites. See Appendix 1 to this policy for guidance for pupils about cyberbullying. The School's separate *IT Acceptable Usage* policies set out the School rules about pupils' use of technology including mobile electronic devices;

7.2.11 **AI-enabled bullying:** the use of artificial intelligence technologies to create, manipulate or distribute content intended to humiliate, intimidate, harass, deceive or harm another person.

7.2.12 **Prejudice-based bullying:** bullying that is motivated by actual or perceived differences between children, such as where a child is adopted, in care or has caring responsibilities;

7.2.13 **Harmful sexual behaviours**: includes sexual harassment and sexual violence:

(a) **sexual harassment**: unwanted conduct of a sexual nature that can occur online and offline. It can include but is not limited to:

(i) sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;

(ii) sexual jokes or taunting;

(iii) physical behaviour such as deliberately brushing against someone, interfering with their clothes, displaying pictures, photos or drawings of a sexual nature;

(iv) online sexual harassment which may include: non-consensual sharing of sexual images and videos (sharing of nudes or semi-nudes images and videos, making, possessing, creating or sharing nudes and semi-nudes); inappropriate sexual comments on social media; exploitation; coercion and threats; upskirting.

(v) sharing, possessing, creating or distributing nudes and semi-nudes, including AI-generated nude or semi-nude images and deepfake sexual imagery

Incidences of sexual harassment will be investigated to ensure they are not part of a wider pattern of sexual harassment and / or sexual violence.

(b) **sexual violence**: sexual offences under the Sexual Offences Act 2003, specifically rape, assault by penetration, sexual assault and causing someone to engage in sexual activity without consent.

7.3 **Discrimination-based bullying:** bullying may also be:

7.3.1 sexist: related to a person's sex or gender reassignment;

7.3.2 racist, or regarding someone's religion, belief or culture;

7.3.3 related to a person's sexual orientation (homophobic bullying);

7.3.4 related to pregnancy and maternity;

7.3.5 related to a person's home circumstances;

7.3.6 related to a person's disability, special educational needs, learning difficulty, health or appearance;

7.3.7 related to a person's age; or

7.3.8 **LGBT-based bullying**: Children who are lesbian, gay, bisexual, or transgender (**LGBT**) can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or are not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff to help counter homophobic, biphobic and transphobic bullying and abuse.

7.4 Racial, sexual, biphobic, transphobic or homophobic bullying and bullying someone because they have a disability are also hate crimes.

7.5 Not all bullying is deliberate or intended to hurt. Some individuals may see their hurtful conduct as "teasing" or "a game" or "for the good of" the other person. These forms of bullying are equally unacceptable but may not be malicious and can often be corrected quickly with advice and without disciplinary sanctions. If left unchallenged or dismissed low level disruption can have a wearing, and significant impact on targeted individuals exposed to such behaviour and may lead to a culture of failing to report. This is not a culture the School adopts.

7.6 A person who makes a physical or sexual assault on another, or who steals or causes damage to the property of another, commits a criminal offence. Bullying may also be regarded as threatening behaviour or harassment which can be either a criminal offence or a civil wrong. Certain acts of voyeurism e.g. upskirting which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing parts of their body or clothing not otherwise visible to obtain sexual gratification, or cause the victim humiliation, distress or alarm are criminal offences. Misuse of electronic communications could also be a criminal offence, for example it is an offence to send an electronic communication (such as a text message or email) to another person with the intent to cause distress or anxiety.

7.7 The School recognises that bullying behaviours may be linked to harmful attitudes relating to misogyny, violence against women and girls (VAWG), or other discriminatory beliefs. Such behaviours will be challenged and addressed through safeguarding, behaviour and educational responses.

Safeguarding and child-on-child abuse

7.7.1 Bullying is closely connected with pupil well-being and therefore will often require a safeguarding response. Bullying demonstrates a lack of respect for others which can overlap with abusive and harassing behaviour and which, in turn, can lead to a culture of unacceptable behaviours and an unsafe environment for children. All this informs the School's zero-tolerance approach, and it is essential that all staff understand the importance of challenging inappropriate behaviours between peers that are actually abusive in nature.

7.7.2 Child-on-child abuse can occur both inside and outside of school and may be taking place whilst not being reported. A one size fits all approach is not appropriate for all pupils, and a contextualised approach for more vulnerable pupils, victims of abuse and pupils with special educational needs and disabilities or certain medical or physical health conditions may be required. Certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours and create an unsafe environment for pupils. In worst case scenarios, dismissing sexual harassment can lead to a culture that normalises abuse and pupils accepting it as normal and not coming forward to report it.

7.7.3 Technology is a significant component in many safeguarding and well-being issues. Pupils are at risk of abuse online as well as face to face. This can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography.

7.7.4 In line with the School's aims and culture of openness and encouragement to report, the School's policy and procedures with regard to child-on-child abuse are set out in Appendix 3 of the School's *Child Protection and Safeguarding Policy and Procedures*. Concerns about a pupil's welfare because they are the victim, witness or perpetrator of bullying behaviour must be reported in accordance with the child protection and safeguarding policy and procedures and appropriate action taken, taking into account the Local Safeguarding Partners' threshold document.

8. Anti-bullying culture and systems

8.1 It is everyone's responsibility to ensure, whatever the circumstances, that no-one becomes a victim of bullying. A person may be vulnerable to bullying because of their age, physical appearance, nationality, colour, sex, sexual orientation, gender reassignment, religion or belief, culture or learning difficulty, disability, home circumstances or because they are new in the School, appears to be uncertain or has no friends. They may also become a target because of an irrational decision by a bully.

8.2 Our expectation of all members of the School community is that:

8.2.1 everyone will uphold the School rules;

8.2.2 a pupil or a member of staff or volunteer who witnesses or hears of an incident of bullying will report it in accordance with the terms of this policy;

8.2.3 a complaint of bullying will always be taken seriously; and

8.2.4 no-one will tolerate unkind actions or remarks or stand by when someone else is being bullied.

8.3 In School and in every year group:

8.3.1 discriminatory and offensive words and behaviour are treated as unacceptable;

8.3.2 positive attitudes are fostered towards people with any protected characteristic including those who are disabled and towards ethnic, religious, cultural and linguistic groups within and outside the School;

8.3.3 positive attitudes are fostered towards gender and sexuality differences through the curriculum and tutorials; and

8.3.4 incidents of bullying which are based on protected characteristics will be distinguished in the School's records.

Governors

8.3.5 The Governors have overall responsibility for promoting and safeguarding the welfare of pupils at the School, ensuring that those in leadership and management positions actively promote pupil well-being. This includes ensuring that policies and procedures are in place and implemented effectively to:

(a) minimise the risk of bullying at the School so that pupils and staff feel safe and secure;

(b) intervene early in low-level disruption to prevent negative behaviours escalating;

(c) deal swiftly with allegations and incidents of bullying at the School so that pupils and staff feel confident that all incidents will be dealt with appropriately;

(d) consider incidences of sexual harassment in broad terms so that it is challenged in order to prevent the normalisation of behaviours which can provide an environment that may lead to sexual violence.

(e) The Safeguarding Governor will receive reports relating to bullying patterns, cyberbullying incidents, online safety concerns, sexual harassment trends and emerging issues associated with Artificial Intelligence and online behaviour.

(f) The Governors will receive updates to allow them to ensure that online safety, including AI-related safeguarding risks, forms part of the School's wider safeguarding framework. Governors will receive information which allows them to assure that filtering and monitoring systems are reviewed annually and are effective in identifying risks associated with cyberbullying, online abuse, harmful content, deepfakes and AI-generated imagery.

8.4 Staff

8.4.1 Through their training and experience, members of staff and volunteers are expected to promote an anti-bullying culture by:

(a) celebrating achievement;

(b) anticipating problems and providing support;

(c) adopting a proactive interactive approach to bullying by gathering intelligence about issues between pupils which might provoke conflict and developing strategies to prevent bullying occurring in the first place;

(d) disciplining perpetrators fairly, consistently and reasonably, taking into account any special educational needs or disabilities of the pupil, taking into account the

motivations and any underlying safety concerns of the perpetrator and providing support as appropriate;

(e) being alert to the fact that some victims, witnesses and perpetrators may themselves be vulnerable to bullying or harassment following any report of sexual violence or sexual harassment:

(f) being alert to times in the school day where the risk of bullying may be higher e.g. significant gatherings of pupils such as in Kingsland Hall and the movement of large numbers of pupils around the site at break time and in between lessons as well as in the Houses;

(g) making opportunities to listen to pupils;

(h) acting as advocates of pupils;

(i) exercising professional curiosity and knowing what to look for in order to detect abuse and to identify children who may be in need of help or protection;

(j) reporting concerning behaviour in accordance with the provisions outlined in this policy, adopting a "it could happen here" approach.

8.4.2 Members of staff and volunteers are vigilant at all times but particularly:

(a) at the start and end of the School day when pupils arrive and leave the site;

(b) before lessons;

(c) in the queue for the dining hall and in the dining hall itself;

(d) in School corridors;

(e) on School transport / School trips;

(f) in boarding houses.

8.4.3 Bullying is regularly discussed in staff meetings and Weekly House Meetings. The result of these meetings is to feedback information about friendship patterns, particular incidents, any pupil who seems to be isolated, any growing "power base" and any known conflict between pupils so that strategies can be developed to prevent bullying incidents.

8.5 Pupils

8.5.1 Through the School's pastoral care systems, pupils are informed and taught that bullying will not be tolerated in the School. They are encouraged:

(a) to celebrate the effort and achievements of others;

(b) to hold and promote positive attitudes;

(c) to feel able to share problems with staff;

(d) to turn to someone they trust, if they have a problem;

(e) not to feel guilty about airing complaints;

(f) to be kind, considerate and tolerant towards others;

(g) to be aware of the impact their behaviour can have on others;

(h) to challenge their peers if they are unkind to others;

(i) to celebrate the diversity of others;

(j) to use technology safely and securely and to be aware of the risks and impact of the use of technology on themselves and others.

8.5.2 Measures are taken throughout each year to educate pupils about bullying and this policy. These measures include:

(a) the PSHE and relationships education and relationships and sex education curriculum includes lessons on bullying;

(b) the School community will challenge stereotypical opinions so negative views are not perpetuated e.g. misogyny;

(c) anti-bullying posters placed around the School;

(d) anti-bullying messages are given in year group and whole school assemblies including to reinforce the positive values we stand for as a community;

(e) While all areas of the curriculum provide the opportunity for moral and spiritual development, the role of PSD, Religious Studies, English and Drama are particularly important. Within these subjects especially, the School embeds the core British values of mutual respect and tolerance, democracy, individual liberty and the rule of law;

(f) online safety is a key aspect of all areas of the curriculum. Parents are informed about online safety issues and the School's strategies to safeguard pupils through correspondence and annual events held by the School to raise awareness for example the Sixth Sense event, lectures and assemblies and workshops. See the School's *Online Safety Policy* for further information about the School's online safety strategy;

(g) The House system plays a pivotal role in the process with the HSM as crucial figures throughout a pupil's time here. The House system provides both formal and informal opportunities for pupils to exercise leadership, service and responsibilities;

(h) Effective tutoring along with the corporate priority given to personal relationships enables pupils to develop social and emotional skills. The co-curricular programme also enables pupils to value each other through corporate participation and teamwork;

(i) The Designated Safeguarding Lead speaks to all year groups at the beginning of every year about the *Child Protection and Safeguarding Policy* and the *Anti-Bullying Policy* and the pupil complaints procedure and support systems that exist in the School.

8.5.3 The School recognises that children with special educational needs and disabilities and certain medical or physical health conditions can face additional safeguarding challenges, including the potential to be disproportionately impacted by behaviours such as peer group isolation bullying, without outwardly showing any signs. The School will consider extra pastoral support for pupils with special educational needs and disabilities, as required.

8.6 Parents

8.6.1 The School will take active measures to promote an anti-bullying culture and make it clear to parents that bullying amongst pupils or towards staff will not be tolerated by the School.

8.6.2 Parents are informed about online safety issues and the School's strategies to safeguard pupils through correspondence and seminars held by the School to raise awareness.

9. Reporting concerns

9.1 Pupils

9.1.1 A pupil who is being bullied, or who is worried about another pupil being bullied, should tell someone without delay and can do so in several ways. They can:

(a) tell their parents, Housemaster / Housemistress, Form Tutor or any member of staff or volunteer at the School or responsible older pupil;

(b) contact the School Counsellor or the Independent Adult, whose contact details are published in the Yellow card and posters around houses for advice;

(c) report bullying though the pupil concerns and complaints procedure;

(d) contact the NSPCC Helpline (0808 800 5000) or Childline (0800 1111) or the Children's Commissioner (0800 528 0731).

9.2 Parents

9.2.1 In their interaction with parents, HSMs encourage parents to report any awareness or concerns of bullying or cyber-bullying to them without delay, so that incidents can be dealt with swiftly and appropriately.

9.3 Staff

9.3.1 A member of staff or volunteer who learns of alleged bullying behaviour should:

(a) respond quickly and sensitively by offering advice, support and reassurance to the alleged victim;

(b) listen carefully and keep an open mind;

(c) not ask leading questions;

(d) reassure the child but not give a guarantee of confidentiality; and

(e) report the allegation to the pupil's HSM as soon as possible.

9.3.2 The pupil's HSM must log the report in the pupil's pastoral record and must then inform the Deputy Head Pastoral who will agree on a strategy for dealing with the matter.

9.3.3 If the alleged bullying behaviour raises a safeguarding concern, the matter should be reported in accordance with the School's *Child Protection and Safeguarding Policy and Procedures* before further investigation is carried out. In the case of bullying potentially involving harmful sexual behaviours, staff will follow guidance set out in Part 5 of KCSIE.

9.3.4 This policy focuses mainly on the bullying of pupils by pupils (i.e. child-on-child) although it is recognised that a staff member could be a victim of and on occasion may be perceived to be the perpetrator of bullying behaviour. The bullying of staff, whether by pupils, parents or other colleagues, is unacceptable. Staff members who are concerned about being bullied or harassed should refer to the School's Staff Handbook. Pupils and parents who feel that a member of staff is bullying should report this in accordance with the procedures set out above.

9.3.5 Any concern involving AI-generated nude or semi-nude images ('deep nudes'), manipulated intimate imagery or other AI-generated sexual content should be treated as a safeguarding concern and reported immediately to the Designated Safeguarding Lead.

10. Why incidents might not be reported

10.1 There are many reasons why a pupil who has suffered bullying may be reluctant to report it. They may become demoralised and may think, for example:

10.1.1 it is telling tales;

10.1.2 they won't believe me because the person I am complaining about is popular and I am not, and I will become even more unpopular;

10.1.3 the things they are saying and doing are too embarrassing to discuss with an adult;

10.1.4 it is all my fault anyway for being overweight / too studious etc;

10.1.5 there are too many of them; there is nothing the staff can do;

10.1.6 it will get back to my parents and they will think less of me;

10.1.7 I will just try and toughen up and grow a thicker skin;

10.1.8 I will lie low and not draw attention to myself;

10.1.9 this is a normal part of growing up and going to school.

10.2 There are also reasons why a pupil who has witnessed or learned of bullying behaviour may not want to make a report. They may think:

10.2.1 it is "grassing" and I will become unpopular;

10.2.2 it is not my concern anyway;

10.2.3 I don't like the victim and I would find it embarrassing to be associated with them.

10.3 Any of these responses would be contrary to our culture at the School. When we implement this policy we encourage every pupil (and their parents) to understand that:

10.3.1 every complaint of bullying will be taken seriously;

10.3.2 members of staff and volunteers will deal with a complaint correctly and effectively in accordance with their experience and the training they have received;

10.3.3 there is a solution to nearly every problem of bullying;

10.3.4 a pupil who complains will receive support and advice and in many cases the problem can be dealt with on a no-names basis;

10.3.5 the primary aim will be for the bullying to cease, not the punishment of the bully unless this is necessary;

10.3.6 we may need to support the bully as well so we can address the causes of bullying behaviour.

11. Assessment of concerns

11.1 The pupil's HSM will normally see the victim and (unless the case is very serious) any witnesses without delay and form an initial view of the allegation. The assessment will consider:

11.1.1 the nature of the incident(s): physical? sexual? verbal? exclusionary? etc

11.1.2 is it a "one-off" incident involving an individual or a group?[1]

11.1.3 is it part of a pattern of behaviour by an individual or a group?

11.1.4 has physical injury been caused?

11.1.5 who should be informed: Head? Parents? the School's Designated Safeguarding Lead? children's social care? the police?

11.1.6 can the alleged bully be questioned without disclosing the victim's identity?

11.1.7 what is the likely outcome if the allegation proves to be correct?

11.2 At this stage, the possible outcomes for an incident which is not too serious include:

[1] The School will be alert to and take action in response to single incidents where necessary and make appropriate records in order to assist it to spot patterns and to ensure the single incident does not become the first of a series.

11.2.1 there has been a misunderstanding which can be explained sympathetically to the alleged victim with advice to the alleged bully; or

11.2.2 the complaint is justified in whole or in part, and further action will be needed.

11.3 If at any stage the alleged bullying behaviour raises a safeguarding concern, the School's *Child Protection and Safeguarding Policy and Procedures* should be followed before further investigation is carried out. This will always be the case where consensual or non-consensual sharing nude or semi-nude images or videos / or making, possessing, creating or sharing nudes and semi-nudes or other harmful sexual behaviours are involved. Where bullying allegedly involves making, possessing, creating or sharing nudes and semi-nudes staff will not view or forward sexual imagery reported to them and will follow the School's policy on sharing consensual or non-consensual nude and semi-nude images as set out in Appendix 1 of the School's *Child Protection and Safeguarding Policy and Procedures*.

11.4 Otherwise, in cases where the pupil's HSM believes that serious bullying behaviour has occurred involving a pupil or has recurred after warnings have been given to the "bully", or where pupils from more than one House are involved they will refer the matter to the Deputy Head Pastoral and the DSL.

11.5 The Deputy Head Pastoral/DSL or allocated member of the DSL's team will:

11.5.1 interview the alleged victim, bully and any witnesses separately, in order to establish the facts of the case. They may decide to ask another senior member of staff to be present; and

11.5.2 send a summary of their findings (including witness statements taken) to the Head and other relevant staff. A copy of this report is held by the Head, DSL and the individual's HSM concerned.

11.6 Together with the Head, the Deputy Head Pastoral and/or Senior Deputy will decide on the action to be taken in accordance with this policy.

11.7 The Head/ Senior Deputy/ Deputy Head Pastoral or individual's HSM (as appropriate) will notify the parents of the victim and bully giving them details of the case and the action being taken. Such action may include further investigation and action in accordance with the School's *Pupil Behaviour Policy*.

12. Response to concerns

12.1 When a complaint of bullying behaviour is upheld, the range of responses may include one or more of the following:

12.1.1 consideration as to whether the bullying incident should be addressed as a safeguarding concern and if so, the School's *Child Protection and Safeguarding Policy and Procedures* will be followed;

12.1.2 advice and support for the victim and, where appropriate, establishing a course of action to help the victim, including support from external services where appropriate;

12.1.3 advice and support to the bully in trying to change their behaviour. This may include clear instructions and a warning or final warning;

12.1.4 consideration of the motivation behind the bullying behaviour and whether external services should be used to tackle any underlying issues of the bully which contributed to the bullying behaviour. If these considerations give rise to safeguarding concerns relating to the bullying, the School's child protection procedures will be followed, including where appropriate preparation of a Pastoral Care Plan (PCP) by the HSM;

12.1.5 a supervised meeting between the bully and the victim to discuss their differences and the ways in which they may be able to avoid future conflict (only with the victim's express agreement);

12.1.6 a disciplinary sanction against the bully, in accordance with the School's *Pupil Behaviour Policy*. In a very serious case or a case of persistent bullying, a pupil may be required to leave the School permanently in accordance with the School's *Pupil Behaviour Policy*. Any disciplinary action will be applied fairly, consistently and reasonably, taking into account any special educational needs or disabilities and the needs of vulnerable pupils;

12.1.7 confiscation of mobile electronic devices, monitoring procedures increased and/or access to the School's internet and email facilities limited if the incident involved cyberbullying (see the *Pupil IT Acceptable Usage Policy*);

12.1.8 action to break up a "power base";

12.1.9 confiscation of mobile electronic devices, increased monitoring procedures or limiting access to the School's internet and email facilities if cyberbullying (see also the School's *Pupils IT Acceptable Usage Policy*);

12.1.10 moving either the bully or victim to another House or form group after consultation with the pupil, their parents and the relevant staff;

12.1.11 involving children's social care or the police;

12.1.12 notifying the parents of one or both pupils about the case and the action which has been taken;

12.1.13 notifying external agencies where appropriate;

12.1.14 pastoral support given by the Chaplain, HSM's tutor as appropriate; and

12.1.15 such other action as may appear to the Head to be appropriate.

12.2 The position should be monitored for as long as necessary thereafter. Action may include:

12.2.1 sharing information with some or all colleagues and with pupils in the Form / Year / House so that they may be alert to the need to monitor certain pupils closely;

12.2.2 ongoing counselling and support;

12.2.3 vigilance;

12.2.4 mentioning the incident at meetings of staff;

12.2.5 reviewing vulnerable individuals and areas of the School.

13. Supporting those severely impacted by bullying

13.1 The School recognises that removing bullied pupils from school is disruptive and can make it difficult to reintegrate. The School understands in some circumstances, however, the consequences of being bullied may have had a severe impact on a pupil's social, emotional or mental health and may have impacted seriously on a pupil's ability to learn.

13.2 The School will do all that is reasonably possible to ensure bullied pupils continue to attend school and maintain their educational progression by putting in place proportionate short term alternative on-site provision plans where necessary.

14. Training

14.1 Staff

14.1.1 The School ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff (including governors) and volunteers understand what is expected of them by this policy and have the necessary knowledge and skills to carry out their roles especially:

(a) having an understanding of the groups who may be more vulnerable to bullying;

(b) awareness of the risk and indications of bullying, and how to deal with cases;

(c) counselling skills (including bereavement);

(d) awareness of the risks of child-on-child abuse including sexual violence and sexual harassment and how bullying may give rise to safeguarding concerns;

(e) in the identification and management of safeguarding concerns arising from generative artificial intelligence, such as deepfakes, manipulated imagery, impersonation, AI-enabled bullying, and AI-facilitated sexual harassment or abuse.

14.1.2 The level and frequency of training depends on role of the individual member of staff.

14.1.3 The School maintains written records of all staff training.

14.2 Pupils

14.2.1 Pupils are given a copy of the *Yellow Card* which is a summary of the School's code of behaviour, expectations, encouragement and sanctions;

14.2.2 Year group and whole school assemblies, as well as chapel services, will often emphasise the positive values we stand for as a community; and

14.2.3 We emphasise with older pupils the role which is expected of them in setting a good example and being helpful to younger pupils and each other. In addition to this Praepostors receive training on leadership and responsibility and on how to recognise bullying behaviour and ensure that they use their position effectively.

15. Risk assessment

15.1 Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed and appropriate action will be taken to reduce the risks identified.

15.2 The format of any such risk assessment may be a stand-alone document or recorded on the School's electronic safeguarding management system. It may vary and may be included as part of the School's overall response to a welfare issue and include the use of individual pupil welfare plans (such as behaviour, healthcare and education plans, as appropriate). Regardless of the format used, the School's approach to promoting pupil welfare will be systematic and pupil focused.

15.3 The Headmaster has overall responsibility for ensuring that matters which affect pupil welfare are adequately risk assessed and for ensuring that the relevant findings are implemented, monitored, evaluated and reviewed.

15.4 Day to day responsibility to carry out risk assessments under this policy will be delegated to HSM/ Deputy Head Pastoral who have been properly trained in, and tasked with, carrying out the particular assessment.

15.5 The School's filtering and monitoring arrangements will be reviewed at least annually, with records maintained of the review process. The review will consider emerging risks including cyberbullying, online abuse, AI-generated content and access to harmful material.

16. Record keeping

16.1 All records created in accordance with this policy are managed in accordance with the School's policies that apply to the retention and destruction of records.

16.2 School staff maintain records of the welfare and development of individual pupils. Every complaint or report of bullying is recorded centrally and monitored to enable patterns to be identified, both in relation to individual pupils and across the School as a whole and to evaluate the effectiveness of the School's approach.

16.3 The Deputy Head Pastoral will maintain a centralised record of all allegations or reports of bullying, including details of those involved and the action taken.

16.4 The Deputy Head Pastoral will monitor the centralised record of bullying incidents on a regular basis to identify patterns in behaviour and the effectiveness of the School's anti-bullying procedures.

16.5 The Deputy Head Pastoral maintains a centralised sexual harassment and violence log which is kept separately where bullying behaviour relates to sexual harassment and violence.

16.6 The records created in accordance with this policy may contain personal data. The School has a number of privacy notices which explain how the School will use personal data. The School's approach to data protection compliance is set out in the overarching *Data Policies*. In addition, staff must ensure that they follow the School's data protection policies and procedures when handling personal data created in connection with this policy; this includes the School's data policies.

Owner: ARP - Deputy Head Pastoral
Safeguarding Governor
Reviewed September 2026
Next review September 2027

Appendix 1 Cyberbullying: guidance for pupils

1 The Department for Education's guidance Preventing and tackling bullying (DfE, July 2017) states that "*The rapid development of, and widespread access to, technology has provided a new medium for "virtual" bullying, which can occur in or outside school. Cyber-bullying is a different form of bullying and can happen at any time of the day, with a potentially bigger audience, and more accessories as people forward on content at a click*".

2 Cyberbullying: bullying that takes place using technology. This includes social media, online gaming, messaging platforms, artificial intelligence tools and other digital technologies.

Examples may include:

• abusive or threatening messages;

• sharing harmful content;

• impersonation;

• exclusion from online groups;

• creation or sharing of deepfakes;

• AI-generated images or recordings;

• AI-generated sexual imagery ('deep nudes')

• misuse of artificial intelligence to harass, manipulate, embarrass or harm others

Pupils should remember the following:

2.1 use the security settings when using technology;

2.2 regularly change your password and keep it private;

2.3 always respect others - be careful what you say online and what images you send;

2.4 think before you send - whatever you send can be made public very quickly and could stay online forever;

2.5 if you or someone you know are being cyberbullied, tell someone. You have the right not to be harassed or bullied online. Tell an adult you trust - your parents, any member of staff or volunteer, the School's Independent Adult, Elly Lees-Jones (Safeguarding Governor) elees-jones@shrewsbury.org.uk or a helpline such as the NSPCC Helpline (0808 800 5000) or ChildLine on 0800 1111;

2.6 don't retaliate or reply online;

2.7 save the evidence - learn how to keep records of offending messages, pictures or online conversations. Ask someone if you are unsure how to do this. This will help to show what is happening and can be used by the School to investigate the matter;

2.8 block the bully. Most social media websites and online or mobile services allow you block someone who is behaving badly;

2.9 don't do nothing - if you see cyberbullying going on, support the victim and report the bullying.

3 You may find the following websites helpful:

3.1 http://www.childnet.com/young-people

3.2 https://www.thinkuknow.co.uk/

3.3 https://www.childline.org.uk/Explore/Bullying/Pages/online-bullying.aspx

3.4 https://www.saferinternet.org.uk/advice-centre/young-people

3.5 http://www.safetynetkids.org.uk

3.6 https://www.ceop.police.uk/Safety-Centre/How-can-CEOP-help-me-YP/

3.7 https://www.bbc.com/ownit

4 Please see the School's *Pupils IT Acceptable Usage Policy* which sets out the School rules about the use of technology including mobile electronic devices. Internet safety measures (including use of filters and monitoring of usage and mobile technology are set out in the School's *Online Safety Policy* and /or *Pupils IT Acceptable Usage Policy*.

5 In addition to the above, issues associated with the appropriate use of technology are discussed both inside and outside the classroom. All junior pupils follow a structured programme of technology in the embedded curriculum. This work includes emphasis on the appropriate and responsible use of technology. In addition to this, important and pertinent issues are raised in PSD and within the tutorial programme. Pupils are reminded of the need to think carefully about what private information they may have in the public domain. Occasional year group Assemblies may also be used as well as external specialists in the area of 'e-safety' and safeguarding.

6 For further information and guidance about cyberbullying and e-safety, please see the Department of Education's Advice for parents and carers on cyberbullying (DfE, November 2014).