



Countering Bullying Policy

Policy Title:	Countering Bullying Policy	Effective Date:	September 2026
Staff Member Responsible:	Deputy Head Pastoral	Review Date:	September 2027

Effective from September 2026

Policy review and revision record

This record is retained within the policy to evidence the September 2026 review and the principal changes made in preparation for inspection and implementation from September 2026.

Area reviewed	September 2026 update	Reason / source	Status
Regulatory and safeguarding framework	Updated references to KCSIE 2026, Independent School Standards guidance, Behaviour in Schools, Preventing and Tackling Bullying and other current guidance.	Current statutory and DfE framework for September 2026.	Complete
Definition and scope	Clarified bullying as an abuse or imbalance of power, usually repeated over time, and distinguished bullying from conflict, friendship difficulties and isolated unkindness while retaining the need to address all harmful behaviour.	DfE Preventing and Tackling Bullying; proportionate and accurate identification of bullying.	Complete
Protected characteristics and prejudice-based bullying	Strengthened explicit coverage of racist, faith-based, disability/SEND, sexist, sexual, homophobic, biphobic and transphobic bullying, harassment and victimisation.	Equality Act 2010; Independent School Standards; KCSIE 2026.	Complete
Child-on-child abuse and safeguarding	Integrated the bullying response with child-on-child abuse procedures and safeguarding thresholds, including sexual harassment, harmful sexual behaviour and sharing nudes and semi-nudes.	KCSIE 2026 and School Safeguarding and Child Protection Policy.	Complete
Online and technology-enabled bullying	Modernised cyberbullying provisions to include messaging, social media, group chats, image/video sharing, impersonation, AI-generated/manipulated	KCSIE 2026; Behaviour in Schools; Online Safety framework.	Complete

Area reviewed	September 2026 update	Reason / source	Status
	content and conduct outside school that affects pupils or the School community.		
Smartphones and smart technology	Aligned reporting, investigation, confiscation and sanctions with the Smartphone-Free School Policy and Behaviour & Discipline Policy.	DfE statutory mobile phone guidance and School policy from September 2026.	Complete
Reporting and investigation	Introduced a clearer graduated procedure: immediate safety, record, triage, investigation, safeguarding assessment, parent communication, outcome and follow-up monitoring.	Best practice; inspection readiness; consistency of response.	Complete
Support and restorative work	Strengthened support for the pupil experiencing bullying, the pupil displaying bullying behaviour and bystanders; restorative work is used only when appropriate, safe and voluntary.	DfE anti-bullying guidance and safeguarding practice.	Complete
Recording, monitoring and governance	Strengthened central recording, pattern analysis, protected-characteristic/SEND monitoring, repeat incidents, online/off-site incidents and termly leadership review.	Independent School Standards and inspection evidence expectations.	Complete
Whole-school and boarding approach	Retained and strengthened education, supervision, pupil voice, boarding and Prep/EYFS provisions within one coherent whole-school framework.	Whole-school prevention and boarding context.	Complete

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1 Aims

1.1 This is the Countering Bullying Policy of Westonbirt School (School).

1.2 Westonbirt is committed to providing a safe, caring and inclusive environment, free from bullying, violence, harassment, discrimination and victimisation, in which every pupil is able to develop their potential.

1.3 The aims of this policy are:

- 1.3.1 prevent bullying so far as reasonably possible through a strong whole-school culture, clear expectations, education, supervision and early intervention;
- 1.3.2 ensure that pupils, staff and Parents understand what bullying is, how to report it and how the School will respond;
- 1.3.3 ensure that bullying related to protected characteristics, SEND, vulnerability or perceived difference is recognised and addressed promptly;
- 1.3.4 provide appropriate support to pupils who experience bullying and to pupils whose behaviour causes harm;
- 1.3.5 ensure that bystanders and the wider peer group understand their responsibility to report, challenge and not reinforce bullying;
- 1.3.6 ensure that online and technology-enabled bullying, including conduct occurring outside School where it affects the School community, is addressed effectively;
- 1.3.7 ensure that bullying which may constitute child-on-child abuse or otherwise raises safeguarding concerns is managed under the School's safeguarding procedures; and
- 1.3.8 ensure that incidents are recorded, monitored and reviewed so that patterns, recurrence and areas of risk can be identified and addressed.

2 Scope and application

2.1 This policy applies to the whole School, including Westonbirt Prep School and EYFS, day pupils, boarders and pupils in the Sixth Form. Age-appropriate arrangements for Prep School and EYFS are set out in section 18.

2.2 The policy applies to bullying or related behaviour occurring:

- 2.2.1 on School premises;
- 2.2.2 in boarding houses or boarding activities;
- 2.2.3 during lessons, activities, trips, fixtures and educational visits;
- 2.2.4 on School transport or while travelling to or from School;
- 2.2.5 online or through personal technology;
- 2.2.6 when a pupil is representing the School or identifiable as a member of the School community; and
- 2.2.7 outside School where the behaviour has repercussions for pupils, safeguarding, the orderly running of the School or the reputation of the School.

2.3 The School may respond to conduct outside School where it is reasonable to do so under the Behaviour & Discipline Policy. This includes online conduct and bullying which begins outside School but affects a pupil's welfare or relationships within School.

3 Regulatory framework and related policies

3.1 This policy has been prepared with regard to the School's duties under the Education (Independent School Standards) Regulations 2014, the Equality Act 2010, the Children Act 2004, the Human Rights Act 1998 and relevant criminal law.

3.2 This policy has regard to the following guidance and advice current for September 2026:

- 3.2.1 Independent school standards guidance (DfE, revised April 2026);
- 3.2.2 Keeping children safe in education 2026 (KCSIE), effective from 1 September 2026;

- 3.2.3 Behaviour in schools: advice for headteachers and school staff (DfE, February 2024);
 - 3.2.4 Preventing and tackling bullying (DfE, current publication);
 - 3.2.5 Mobile phones in schools (DfE statutory guidance, to be followed from 1 September 2026);
 - 3.2.6 Searching, screening and confiscation: advice for schools (DfE, July 2022);
 - 3.2.7 Boarding schools: national minimum standards (current version); and
 - 3.2.8 Sharing nudes and semi-nudes: advice for education settings working with children and young people (UK Council for Internet Safety, current version).
- 3.3 This policy should be read alongside the following School policies and procedures:
- 3.3.1 Behaviour & Discipline Policy;
 - 3.3.2 Safeguarding and Child Protection Policy;
 - 3.3.3 Smartphone-Free School Policy;
 - 3.3.4 Online Safety Policy and IT / Acceptable Use Policy for Pupils;
 - 3.3.5 Equal Opportunities Policy;
 - 3.3.6 SEND Policy and Accessibility Plan;
 - 3.3.7 Mental Health and Wellbeing arrangements;
 - 3.3.8 Policy on Smoking, Alcohol and the Misuse of Drugs and Substances;
 - 3.3.9 School Transport Behaviour Agreement and procedures, where applicable; and
 - 3.3.10 Parental Complaints Policy and procedures.

4 Publication and availability

- 4.1 This policy is published on the School website and is available to staff and Parents, including Parents of boarders.
- 4.2 The policy is made known to pupils through Personal Development / PSHE, tutorial programmes, assemblies and chapel, boarding and house activities, and age-appropriate work in Prep School and EYFS.
- 4.3 New staff are introduced to this policy through induction and all staff receive appropriate refresher training.
- 4.4 A hard copy or accessible-format copy is available on request.

5 Definitions

- 5.1 Bullying is behaviour by an individual or group, usually repeated over time, that intentionally hurts another individual or group physically or emotionally. In essence, bullying involves an abuse or imbalance of power, whether real or perceived.
- 5.2 Bullying may be overt or subtle. It may involve one pupil or a group and may be reinforced by others through encouragement, sharing, liking, forwarding, exclusion, silence or other complicity.
- 5.3 Bullying can include:
 - physical bullying, including hitting, pushing, damaging or taking property, intimidation or unwanted physical contact;
 - verbal bullying, including name-calling, threats, ridicule, discriminatory language or repeated insulting comments;
 - relational or emotional bullying, including deliberate exclusion, manipulation, coercion, humiliation, rumour-spreading or controlling friendships;
 - sexual or sexist bullying and harassment;
 - prejudice-based bullying related to actual or perceived protected characteristics, SEND, appearance, health, family circumstances, culture or other difference;
 - initiation or hazing-type behaviour or rituals intended to cause hurt, fear, humiliation or degradation;

- online or technology-enabled bullying; and
- encouraging, directing or deliberately enabling others to bully.

5.4 Not every disagreement, friendship difficulty, argument or isolated act of unkindness is bullying. Such behaviour may nevertheless breach School expectations and will be addressed under the Behaviour & Discipline Policy. Staff should avoid minimising harmful behaviour merely because the threshold for bullying has not yet been established.

5.5 Harassment, discrimination and victimisation have specific meanings in law. Conduct related to a protected characteristic may amount to unlawful harassment even where it is not repeated. The School will address such conduct promptly whether or not it meets the definition of bullying in paragraph 5.1.

6 Responsibilities

6.1 The Proprietor has overall responsibility for ensuring that the School meets the Independent School Standards, including the requirement for an effective anti-bullying strategy.

6.2 The Head is responsible for ensuring that this policy is implemented effectively. Day-to-day leadership of the School's countering-bullying strategy is delegated to the Deputy Head Pastoral.

6.3 All staff must model respectful behaviour, remain alert to signs of bullying, respond promptly to concerns, record and report incidents in accordance with this policy, and refer safeguarding concerns without delay.

6.4 Tutors, Heads of Year / Key Stage, Houseparents and the pastoral team have a particular responsibility for monitoring relationships, identifying patterns and coordinating support.

6.5 Pupils are expected to treat others with respect, report bullying or suspected bullying, avoid reinforcing harmful behaviour and cooperate honestly with investigations.

6.6 Parents are expected to support the School's approach, raise concerns promptly and encourage their child to use School reporting routes rather than escalating peer disputes through direct contact with other pupils or families.

7 Understanding bullying and related behaviour

7.1 Bullying can happen in any school. Sometimes it is overt and intimidatory; often it is hidden, relational or subtle. The School treats reports seriously and does not assume that an absence of visible incidents means that bullying is not occurring.

7.2 Bullying is particularly serious where it targets a pupil because of, or is connected with, a protected characteristic or perceived characteristic. This includes race, religion or belief, sex, sexual orientation, gender reassignment and disability. Age, pregnancy and maternity may also be relevant where applicable.

7.3 Pupils with SEND, disabilities, communication differences, social vulnerabilities or other additional needs may be more vulnerable to bullying or may experience and communicate incidents differently. Staff will make reasonable adjustments to reporting, investigation and support arrangements where required.

7.4 The School recognises that bullying can overlap with child-on-child abuse, sexual violence or harassment, coercive behaviour, harmful sexual behaviour, hate incidents, criminal conduct or safeguarding concerns. These matters must not be managed solely as behaviour incidents where safeguarding procedures are required.

8 Prevention and whole-school culture

8.1 Westonbirt seeks to prevent bullying by creating a culture in which kindness, respect, responsibility and inclusion are actively taught, modelled and reinforced.

8.2 Preventative work includes:

- Personal Development / PSHE, tutorials, assemblies, chapel and curriculum opportunities which develop respectful relationships, empathy, digital citizenship and understanding of protected characteristics;
- clear behaviour expectations and consistent adult responses to derogatory language, prejudice, harassment, exclusion and low-level unkindness;

- staff supervision at break, lunch, boarding and other less-structured times, with attention to locations and contexts in which bullying may be more likely;
- pupil voice, including opportunities for pupils to identify areas of concern and contribute to prevention strategies;
- age-appropriate education about bystander behaviour and a culture of “call it out” or “call it up”;
- targeted support for classes, houses, groups or individuals where relationship difficulties or patterns are identified;
- Anti-Bullying Week and other appropriate awareness activity; and
- regular communication between pastoral, academic and boarding staff so that emerging concerns are recognised early.

8.3 The School’s Health and Wellbeing Centre, Counsellor, Listener, Mental Health Lead, visiting Chaplain and wider pastoral team provide specialist and pastoral support alongside Tutors, Heads of Year and Houseparents.

9 Reporting concerns

9.1 Pupils who believe that they are being bullied, or who are worried that another pupil is being bullied, are encouraged to tell a trusted adult as soon as possible. They may also speak to an appropriate senior pupil, but concerns must ultimately be passed to staff so that the School can act.

9.2 A pupil may report verbally, in writing or through any age-appropriate reporting mechanism provided by the School. Prep School pupils may also use established mechanisms such as worry boxes, wellbeing sessions or trusted-adult routes.

9.3 A request for confidentiality will be treated sensitively but cannot be guaranteed. Staff must explain that information may need to be shared where this is necessary to keep a child or another person safe.

9.4 Staff who receive a report must listen carefully, avoid promising secrecy, reassure the pupil that the concern will be taken seriously, establish immediate safety and record the report promptly.

9.5 The pupil reporting bullying should not be required repeatedly to recount distressing events to multiple adults where this can reasonably be avoided.

10 Responding to a report of bullying

10.1 The School will respond promptly, fairly and proportionately. The first priorities are safety, safeguarding and preventing further harm.

10.2 The response will normally include:

- 10.2.1 an immediate assessment of safety and any need for protective or supervisory measures;
- 10.2.2 a written record of the concern and referral to the appropriate pastoral lead;
- 10.2.3 consideration of whether the matter meets or may meet a safeguarding threshold;
- 10.2.4 a proportionate investigation, including accounts from relevant pupils and witnesses and consideration of available evidence;
- 10.2.5 reasonable adjustments for age, SEND, disability, communication needs or vulnerability;
- 10.2.6 communication with Parents where appropriate, subject to safeguarding considerations;
- 10.2.7 a decision, on the balance of probabilities for disciplinary purposes, as to what occurred and whether the behaviour constitutes bullying or another breach of School rules;
- 10.2.8 appropriate support, sanctions and/or interventions; and
- 10.2.9 planned follow-up to check that the behaviour has stopped and that relationships, safety and wellbeing are improving.

10.3 Staff will listen to all relevant accounts before reaching a disciplinary conclusion. This does not prevent the School from putting immediate safety measures in place while enquiries continue.

10.4 Where several incidents appear individually minor, staff will consider the cumulative impact and whether they demonstrate a pattern, imbalance of power or coordinated behaviour.

10.5 The School will not require a pupil who has experienced bullying to meet, reconcile with or take part in restorative work with another pupil where this would be unsafe, inappropriate or unwanted.

11 Safeguarding and child-on-child abuse

11.1 A bullying concern must be treated as a safeguarding concern where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, harm or where the behaviour falls within the School's child-on-child abuse procedures.

11.2 Staff must refer concerns to the Designated Safeguarding Lead or a Deputy in accordance with the Safeguarding and Child Protection Policy. The DSL will determine whether external safeguarding agencies or the Police should be involved.

11.3 Particular care is required where bullying involves sexual violence or sexual harassment, harmful sexual behaviour, coercion, sharing nudes or semi-nudes, exploitation, hate-related behaviour, serious threats, violence, stalking or other potentially criminal conduct.

11.4 The School will support all children affected by a safeguarding incident, including the child who has experienced harm, the child alleged to have caused harm and any witnesses, while maintaining appropriate boundaries and risk management.

12 Online and technology-enabled bullying

12.1 Online bullying is bullying or harmful peer behaviour carried out through digital technology. It can occur at any time, reach a large audience quickly and continue beyond the physical School environment.

12.2 It may include abusive or threatening messages, group-chat behaviour, deliberate exclusion, impersonation, posting or sharing images or recordings, sexualised content, doxxing or exposure of personal information, malicious rumours, repeated contact, manipulated or AI-generated content, or encouraging others to target a pupil.

12.3 The School may address online conduct occurring outside School where it affects the welfare of a pupil, relationships within School, safeguarding, the orderly running of the School or its reputation.

12.4 The Smartphone-Free School Policy does not remove the need to address online bullying that takes place outside the School day. Where a mobile phone, smart device or other electronic device is relevant to an investigation, searching and confiscation will be managed in accordance with the Behaviour & Discipline Policy, Safeguarding Policy and applicable DfE guidance.

12.5 Where potentially illegal or child sexual abuse material may be involved, staff must not intentionally view, copy, forward or share such material and must refer the matter immediately to the DSL in accordance with safeguarding procedures.

13 Supporting pupils

13.1 A pupil who experiences bullying will be listened to, reassured that the behaviour is not acceptable and involved, so far as appropriate, in decisions about support and safety.

13.2 Support may include a named adult, increased check-ins or supervision, counselling or wellbeing support, adjustments to routines, support with friendships, academic support, online-safety advice, a safety or support plan, and liaison with Parents or external professionals.

13.3 The School will also seek to understand and address the needs underlying bullying behaviour. Support does not remove accountability. A pupil who has bullied another may require clear boundaries, sanctions, pastoral work, education, mentoring, behaviour monitoring, SEND support or safeguarding intervention.

13.4 Bystanders and peer groups may require support or education to understand their role in reinforcing or challenging bullying. The School may work with a wider group or cohort where this is likely to reduce harm and improve culture, while protecting confidentiality.

14 Sanctions and restorative approaches

14.1 Bullying is a breach of the School's Behaviour & Discipline Policy. Sanctions will be reasonable and proportionate and will take account of the seriousness, persistence and impact of the behaviour, any safeguarding considerations, the pupil's age and circumstances, and relevant SEND or disability considerations.

14.2 Sanctions may include those set out in the Behaviour & Discipline Policy, including Refocus or other detention, loss of privileges, monitoring or report, restrictions relating to technology, suspension and, in the most serious or persistent cases, permanent exclusion or required removal.

14.3 Where bullying involves misuse of a mobile phone or smart technology, the Smartphone-Free School Policy and associated confiscation and graduated sanctions will also apply.

14.4 Restorative approaches may be valuable where they are safe, appropriate and genuinely voluntary. They must not be used to minimise bullying, place responsibility on the pupil who has experienced harm, or substitute for necessary safeguarding action or sanctions.

14.5 An apology may form part of a restorative response but will not, by itself, be treated as evidence that risk has been resolved. Follow-up monitoring is required.

15 Parents and carers

15.1 Parents who are concerned that their child may be experiencing bullying, or may be displaying bullying behaviour, should contact the child's Tutor, Class Teacher, Houseparent, Head of Year or the Deputy Head Pastoral as appropriate.

15.2 Parents are asked to provide relevant information or evidence, avoid direct confrontation with other pupils or families, and work with the School while enquiries are undertaken.

15.3 The School will communicate with Parents appropriately about significant concerns, outcomes and support, while respecting the privacy and safeguarding rights of other pupils. The School will not normally disclose confidential disciplinary or safeguarding information about another child.

15.4 Parents have a responsibility to support the School's countering-bullying strategy and to encourage their child to be a positive, respectful member of the School community, including online.

16 Staff training, supervision and pupil voice

16.1 The Head and Deputy Head Pastoral will ensure that staff receive appropriate induction and refresher training on recognising, preventing, recording and responding to bullying, including prejudice-based bullying, SEND vulnerability, child-on-child abuse and online bullying.

16.2 Staff should be alert to locations, times, peer dynamics and online contexts in which bullying may be more likely. Duty and boarding arrangements will be reviewed where patterns or risks are identified.

16.3 Pupil voice will be used, where appropriate, to assess culture, identify emerging concerns and evaluate the effectiveness of prevention strategies. Pupils should know whom they can approach and have confidence that reports will be acted upon.

17 Recording, monitoring and review

17.1 Reports of bullying and significant bullying-related concerns will be recorded centrally so that individual and group patterns can be identified. Records will be handled in accordance with data protection and safeguarding requirements.

17.2 Records should include, where appropriate: date, time and location; pupils involved; nature and alleged basis of the behaviour; protected-characteristic, SEND or vulnerability factors; online/off-site elements; immediate action; safeguarding referral; parent communication; investigation outcome; sanctions or support; and follow-up review.

17.3 The Deputy Head Pastoral will review bullying data at least termly, including recurrence, locations, year groups, boarding/day context, online incidents, protected-characteristic themes, SEND/vulnerability factors and the effectiveness of interventions.

17.4 Significant trends, serious incidents and the effectiveness of the School's anti-bullying strategy will be reported to the Head and Proprietor through the School's governance and safeguarding oversight arrangements.

17.5 This policy will be reviewed at least annually and sooner where there is a significant change in law, statutory guidance, School practice or identified risk.

18 Westonbirt Prep School and EYFS

18.1 The principles of this policy apply throughout Westonbirt Prep School, including EYFS, with language, reporting routes, investigation and support adapted to the age and developmental stage of the child.

18.2 Prep School aims to provide a caring, friendly and safe environment in which pupils understand that bullying is unacceptable, know how to seek help and develop the skills needed for positive relationships.

18.3 Prevention includes Personal Development / PSHE, class and form discussion, circle time and other age-appropriate opportunities, Rights and Responsibilities work, wellbeing activities, assemblies, friendship support and direct teaching about empathy, emotions, difference and respectful behaviour.

18.4 Younger children may communicate concerns indirectly. Staff should remain alert to changes in behaviour, attendance, confidence, friendships, play, physical presentation or emotional regulation and should investigate concerns sensitively.

18.5 EYFS children develop their understanding of the world, empathy, self-regulation and relationships through the curriculum. Staff will use developmentally appropriate language to distinguish ordinary conflict from repeated or targeted harmful behaviour while responding promptly to all concerns.

18.6 Serious or repeated concerns will be recorded centrally and managed in liaison with the Head of Prep, Deputy Head Pastoral and DSL as appropriate. Parents will be involved in accordance with this policy and safeguarding requirements.

Appendix 1 Countering Bullying Procedure

Stage	Required action
1. Receive and reassure	Listen without judgement. Thank the pupil for reporting. Do not promise secrecy. Establish whether anyone is in immediate danger.
2. Protect	Put proportionate measures in place to prevent further contact or harm. Consider supervision, boarding arrangements, online contact and any immediate medical or emotional support.
3. Record and refer	Make a prompt written record and notify the relevant pastoral lead. Serious, sexual, discriminatory, threatening or otherwise safeguarding-related concerns must be referred to the DSL without delay.
4. Triage	Consider whether the report may involve bullying, a behaviour incident, child-on-child abuse, unlawful harassment/discrimination, a criminal offence, or a combination of these.
5. Investigate	Obtain proportionate accounts and evidence. Avoid unnecessary repeated interviewing. Consider cumulative incidents, peer dynamics, online evidence and the possibility of group behaviour.
6. Decide and respond	Determine the facts on the balance of probabilities for disciplinary purposes. Apply appropriate safeguarding action, sanctions, support and education.
7. Communicate	Inform Parents as appropriate, subject to safeguarding considerations and the privacy of other pupils.
8. Follow up	Check that the behaviour has stopped, review the wellbeing of affected pupils and monitor for retaliation, recurrence or displacement into online/off-site settings.
9. Review patterns	Update the central record and consider whether wider action is needed for a class, year group, house, location, transport route or online peer group.

Speaking with a pupil who may be experiencing bullying

- reassure them that the concern will be taken seriously;
- identify clearly what is happening and what is most worrying them;
- avoid implying that they are responsible for having been targeted;
- ask what would help them feel safe;
- explain what will happen next and the limits of confidentiality;

- identify a trusted adult and follow-up arrangements; and
- record their account accurately and in their own words where possible.

Speaking with a pupil whose behaviour may be bullying

- identify the reported behaviour clearly and without prejudging the outcome;
- seek their account and any relevant context;
- explain the impact and the School's expectations;
- consider SEND, communication, safeguarding or other underlying needs without excusing harmful behaviour;
- make clear what behaviour must stop immediately;
- explain likely next steps, support and possible sanctions; and
- monitor for retaliation or attempts to influence witnesses.

Appendix 2 Signs and indicators

1 A pupil may indicate through behaviour, presentation or changes in routine that something is wrong. No single sign proves bullying, and the indicators below may have other explanations. They should nevertheless prompt curiosity, sensitive enquiry and, where appropriate, investigation.

- becomes reluctant or afraid to attend School, boarding, activities or particular lessons;
- changes their normal route, routine, friendship group or use of social spaces;
- becomes withdrawn, anxious, distressed, unusually quiet or lacking in confidence;
- shows unexplained deterioration in work, concentration, attendance or punctuality;
- has damaged or missing possessions, unexplained requests for money, or avoids eating/social times;
- has unexplained injuries or physical complaints;
- experiences sleep disturbance, nightmares, appetite changes or repeated reports of feeling unwell;
- becomes unusually aggressive, disruptive, secretive or distressed after using technology;
- withdraws from online groups, changes accounts or appears fearful of messages/notifications;
- is frightened or unwilling to explain what is wrong;
- shows marked changes in mood, self-esteem or relationships; or
- expresses hopelessness, self-harm or suicidal thoughts. Any such concern must be managed immediately under safeguarding procedures.

Appendix 3 Recording and monitoring framework

1 The purpose of central recording is to support individual pupils, ensure continuity of response, identify recurrence and enable the School to evaluate the effectiveness of its anti-bullying strategy.

Record field	Minimum information
Incident details	Date, time, location/context and reporting route.
Pupils involved	Pupil(s) experiencing harm, pupil(s) alleged to have caused harm, witnesses/bystanders.
Nature of concern	Physical, verbal, relational/emotional, sexual/sexist, prejudice-based, online/technology-enabled, hazing/initiation, property or other.
Relevant factors	Protected characteristic or perceived characteristic; SEND/disability; vulnerability; boarding/day context; previous incidents.
Safeguarding	Whether referred to DSL; child-on-child abuse considerations; external agency/Police involvement where applicable.
Action taken	Immediate protection, investigation, parent communication, sanctions, support, restorative work if appropriate.
Outcome	Finding and rationale, including whether the behaviour was bullying, another behaviour breach or a safeguarding matter.
Follow-up	Named lead, review date, pupil feedback, recurrence/retaliation check and closure decision.

2 The Deputy Head Pastoral will use central records to review patterns and trends at least termly. Analysis should be proportionate and should include, where useful, year group, sex, boarding/day status, SEND/disability, protected-characteristic themes, locations, online contexts, repeat pupils and repeat peer groups.

3 Data should be interpreted carefully. A rise in recorded incidents may reflect improved reporting confidence rather than deterioration in culture. Leaders should consider both quantitative information and pupil/staff voice when evaluating effectiveness.

4 Records of bullying which constitute safeguarding concerns form part of the School's safeguarding record and must be managed in accordance with the Safeguarding and Child Protection Policy and data protection requirements.