

Anti - Bullying Policy

History of policy changes/review

Policy:	Anti-bullying Policy
Author:	Head of Inclusion
Review Frequency:	Annually

Date	Page	Details of change	Date ratified
02.03.2018	Section 1, Page 4	Policy, Ethos, Aims	
02.03.2018	Section 2, Page 5,6	The Behaviours of Children with SLD and t Characteristics of Bullying Behaviours	
02.03.2018	Section 3, Page 7	Roles and Responsibilities	
02.03.2018	Section 3, Page 7	Pupil Voice	
02.03.2018	Section 3, Page 7	Reporting & Recording	
02.03.2018	Section 3, Page 8	Working with families	
10.02.2020	Section 3, Page 7	Reporting and Recording	
03.02.2021	Section 2, Page 5	Defining Bullying Behaviours	
03.02.2021	Section 2	Prevention and Resolution	
03.02.2021	Section 3, Page 8	Reporting and Recording	
03.02.2021	Section 3, Page 8	Monitoring	
03.02.2021	Section 3, Page 10	Appendix 1	
04.06.2021	Section 2	The Behaviours of Children with SLD and t Characteristics of Bullying Behaviours	
04.06.2021	Section 3	Prevention	
04.06.2021	Section 4	Response	
01.05.2022		Reviewed	
27.02.2023	Section 4	Links with Other Briarwood Policies	
09.02.2024		Updates: Background Policy Change from “Ethos” to “statement of inte Addition of legal framework section Definitions Roles and responsibilities Addition of cyber bullying	
28.04.2025		Updated Legislation and Prevention	

Contents

Background	3
Policy	4
Statement of intent.....	4
Aims	4
Legal framework	5
Definitions.....	5
Types of bullying.....	6
The Behaviours of Children with SLD and the Characteristics of Bullying Behaviours.....	7
Roles and Responsibilities.....	8
Prevention.....	10
Procedures.....	10
Cyberbullying (In reference to KCSIE updates – for further information on E-safety, please see our E-safety Policy).....	13
Working with Families.....	14
Reference List	15
Appendix.....	16
Appendix 1.....	16

‘Every child is unique – in characteristics, interests, abilities and needs; and every child has the ability to enjoy his or her rights without discrimination of any kind.’

(Thomas Hammarberg 1997)

Background

Briarwood School is a special school which provides education for children with severe learning disabilities (SLD) including autism spectrum disorders (ASD), profound and multiple learning disabilities (PMLD) and complex needs (CN), aged 3 to 19 years.

The children and young people at Briarwood School have a wide-range of complex needs. As a school community we understand that bullying in this context can have additional subtleties and raise issues that are in themselves complicated to resolve. Not all learners at Briarwood will recognise bullying behaviour if they experience it or/and

may be unable to express or communicate their aversion to and also to respond appropriately to instances of bullying behaviours. Equally, not all students would recognise that certain behaviours directed towards others may be undesirable or that they might be construed as bullying. We recognise that the negative consequences of experiencing bullying can last well into adulthood. It is vital that a timely and well-planned response to bullying is implemented as this can have a positive effect on lessening the impact of those who experience it.

Policy

This policy sets out the procedures for dealing with bullying and has been written with reference to Safe to Learn – Bullying of Children with Special Educational Needs and Disabilities – Embedding Anti-Bullying work in School (2008) and Preventing and tackling bullying - Advice for Headteachers, staff and governing bodies (2017) alongside guidance and advice from the Anti-Bullying Alliance.

The Education and Inspections Act 2006 outlines several legal obligations regarding the school's response to bullying. Under section 89, schools must have measures in place to encourage good behaviour and prevent all forms of bullying amongst pupils. These measures are part of the school's Behaviour Policy, which is communicated to all pupils, school staff and parents. All staff, parents and pupils work together to prevent and reduce any instances of bullying at the school. This policy should be read with the Briarwood School Behaviour and Pastoral Policy.

Statement of intent

We are committed to providing a caring, friendly and safe environment for all of our students so they can learn in a relaxed and secure atmosphere. Students are given every opportunity to express their feelings in the most appropriate form of communication. Briarwood has adopted trauma informed approach, it provides a safe environment that fosters trust and belonging alongside a culture that supports mental health. Our aim is to maximise the protective factors of school by creating an environment of safety that has strong, positive and supportive relationships at its centre. Please read Relationship Policy for more information

Aims

- To provide a happy and secure school environment for all students and staff.
- All governors, teaching and non- teaching staff and parents know what the school policy is on bullying and what they should do if bullying arises.
- To ensure that pupils learn in a supportive, caring and safe environment without fear of being bullied.
- To promote consistency of approach and create an environment in which all types of bullying are considered unacceptable.
- To react to bullying incidents in a reasonable, proportionate and consistent way.

Bullying is anti-social behaviour and affects everyone; it is unacceptable and will not be tolerated.

Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- Education and Inspections Act 2006
- Equality Act 2010
- Protection from Harassment Act 1997
- Malicious Communications Act 1988
- Public Order Act 1986
- Communications Act 2003
- Human Rights Act 1998
- Crime and Disorder Act 1998
- Education Act 2011
- DfE (2017) ‘Preventing and tackling bullying’
- DfE (2018) ‘Mental health and wellbeing provision in schools’
- DfE (2024) ‘Keeping children safe in education 2024’
- DCMS, DSIT, and UK Council for Internet Safety (2020) ‘Sharing nudes and semi-nudes: advice for education settings working with children and young people
- DfE (2017), Preventing and tackling bullying: Advice for headteachers, staff and governing bodies

This policy operates in conjunction with the following school policies:

- Behaviour and Pastoral Policy
- Child Protection and Safeguarding Policy
- Relationship policy
- E safety Policy
- Health and Safety Policy
- Relationship, Sex and Health Education policy
- Curriculum policy

Definitions

The Department for Children, Schools and Families publication *Safe to Learn – Bullying of Children with Special Educational Needs and Disabilities – Embedding Anti-Bullying work in School. (2008)* describe bullying as ‘Behaviour by an individual or a group usually repeated over time that intentionally hurts another individual or group either physically or emotionally’. Bullying behaviour which may occur in school usually has common features including:

- It is deliberate, hurtful behaviour;
- It is repeated, often over a period of time;
- It is difficult for those being bullied to defend themselves;
- It is targeted at a specific individual or group;

Vulnerable pupils are more likely to be the targets of bullying due to the attitudes and behaviours some young people have towards those who are different from themselves. Vulnerable pupils may include, but are not limited to:

- * Pupils who are adopted.
- * Pupils suffering from a health problem.
- * Pupils with caring responsibilities.
- * Pupils from socioeconomically disadvantaged backgrounds.

Pupils with certain characteristics are also more likely to be targets of bullying, including, but not limited to:

- * Pupils who are LGBTQ+, or perceived to be LGBTQ+
- * Black, Asian and minority ethnic (BAME) pupils.
- * Pupils with SEND.

Types of bullying

Bullying behaviour can cause feelings of distress, fear, loneliness and lack of confidence in those that are at the receiving end. The four main types of bullying behaviour:

- Physical: hitting, kicking, pushing, taking belongings.
- Verbal: name-calling, insulting, racist or discriminatory remarks attributed to gender or sexual orientation.
- Emotional: spreading nasty stories or rumours; excluding from groups, being ignored, intimidation or threatening behaviour.
- Online (Cyber bullying): using IT particularly the internet and mobile phones, to deliberately upset someone.

Many kinds of behaviour can be considered bullying, and bullying can be related to almost anything. Teasing another pupil because of their appearance, religion, ethnicity, gender, sexual orientation, home life, culture, or SEND are some of the types of bullying that can occur.

Racist bullying: Bullying another person based on their ethnic background or skin colour. Racist bullying is a criminal offence under the Crime and Disorder Act 1998 and Public Order Act 1986.

Homophobic and biphobic bullying: Bullying another person because of their actual or perceived sexual orientation.

Transphobic bullying: Bullying based on another person's gender identity or gender presentation, or for not conforming to dominant gender roles.

Sexist bullying: Bullying based on sexist attitudes expressed in a way to demean, intimidate or harm another person because of their sex or gender. Sexist bullying may sometimes be characterised by inappropriate sexual behaviours.

Sexual bullying: Bullying behaviour that has a physical, psychological, verbal or non-verbal sexual dimension or dynamic that subordinates, humiliates or intimidates another person. This is commonly underpinned by sexist attitudes or gender stereotypes.

Ableist bullying: Bullying behaviour that focusses on another person’s disability or support needs; this can include mocking the individual’s disability or their needs, using derogatory words or slurs in relation to an individual’s disability, or deliberately excluding an individual because of their disability.

Prejudicial bullying: Bullying based on prejudices directed towards specific characteristics or experiences, e.g. religion or mental health issues.

Relational bullying: Bullying that primarily constitutes of excluding, isolating and ostracising someone – usually through verbal and emotional bullying.

Socioeconomic bullying: Bullying based on prejudices against the perceived social status of the victim, including, but not limited to, their economic status, their parents’ occupations, their health or nutrition level, or the perceived “quality” of their clothing or belongings.

The Behaviours of Children with SLD and the Characteristics of Bullying Behaviours

Pupils attending Briarwood School have a diagnosis of SLD and associated needs, and all pupils have an EHCP. Cognitive understanding and communication impairment are strong factors in how/what the children and young people communicate.

The cognitive understanding and complex needs of the children and young people at Briarwood can result in varying levels of understanding of bullying behaviour; the impact their behaviour may have on others and how to appropriately express their needs and emotions.

The following three categories summarise the varying levels of understanding of our children and young people:

- No understanding of the targeted behaviours and/or are a result sensory processing need. This level of understanding would apply to the majority of the children and young people at Briarwood.
- Some capacity to understand right and wrong when they are on baseline and present with little or no inappropriate behaviours. However, once triggered off baseline they may target and hurt others unintentionally with little understanding of the impact of behaviours on others. This level of understanding would apply to some of the children and young people at Briarwood.
- Pre-planned, targeted behaviours with intent to harm others. This would apply to a minority of the children and young people at Briarwood.

As the DfE anti-bullying guidance notes, children with special educational needs and disabilities may not be able to articulate their experiences. Learners who are being bullied may show changes in behaviour, such as becoming shy, nervous, feigning sickness, refusing to come to school, clinging to adults, refusing to remain in class. It is important that all school staff are alert to the signs of bullying and act promptly and firmly against any form of bullying in line with the procedures below.

It is also possible that one child may develop an obsession with another child or display undesirable behaviours towards others through high anxiety levels. These may manifest in potentially harmful behaviours such as kicking, biting, pinching, hitting or throwing objects.

All staff have a duty to be vigilant to these behaviours and the fear/anxiety that the ‘target’ child may have. Incidents of bullying with or without intent are recorded on Sleuth. Any incidents of bullying will be reported to a member of the Senior Leadership/ Management Team (SLT/ SMT). It is important that this information must be shared amongst all members of the class team and other members of staff as soon as possible.

Roles and Responsibilities

The governing board is responsible for:

- Evaluating and reviewing this policy to ensure that it does not discriminate against any pupils on the basis of their protected characteristics or backgrounds.
- The overall implementation and monitoring of this policy.
- Ensuring that all governors are appropriately trained regarding safeguarding and child protection at induction.
- Ensuring that the school adopts a tolerant and open-minded policy towards difference.
- Ensuring the school is inclusive.
- Analysing any bullying data to establish patterns and reviewing this policy in light of these.
- Ensuring the DSL has the appropriate status and authority within the school to carry out the duties of the role.
- Appointing a safeguarding link governor who will work with the DSL to ensure the policies and practices relating to safeguarding, including the prevention of cyberbullying, are being implemented effectively.
- Ensuring that pupils are taught how to keep themselves and others safe, including online.

The Executive and Senior Leadership Team are responsible for:

- Ensuring that the whole school is promoting equality and inclusion.
- Supporting anti- bullying strategies.
- Oversee the implementation of the Anti – Bullying policy.

Heads of School are responsible for:

- Corresponding and meeting with parents where necessary.
- Providing a point of contact for pupils and parents when bullying incidents occur.

- Ensuring any anti-bullying strategies within the department are carried out and action plans updated and reviewed

All staff are responsible for:

- Ensure that all incidents of bullying are reported to SMT or SLT immediately
- To be vigilant and constantly monitor the pupils for bullying related behaviour and follow the procedure when evidence points towards bullying taking place.
- To model high standards of behaviour and have high expectations from all the students.
- To maintain a positive attitude towards all pupils.
- Being alert to social dynamics in their class.
- Being available for pupils who wish to report bullying.
- Providing follow-up support after bullying incidents.
- Being alert to possible bullying situations, particularly exclusion from friendship groups, and informing the pupil's Head of School of such observations.
- Refraining from stereotyping when dealing with bullying.
- Understanding the composition of pupil groups, showing sensitivity to those who have been the victims of bullying.
- Reporting any instances of bullying once they have been approached by a pupil for support.

Parents are responsible for:

- Informing their child's Head of School or class Teacher if they have any concerns that their child is the victim of bullying or involving in bullying in anyway.
- Being mindful of their child's behaviour, attitude and characteristics and informing the relevant staff members of any changes.

Pupil Voice:

- Where appropriate pupils will be involved in exploring bullying and its impact through PSHE and Myself Curriculum. This will include the role of friendships, peer support and celebrating individuality. This can involve a variety of educational opportunities, such as discussion and role- play.
- The pupils can express their feelings and thoughts through: student council, annual reviews, Education Health Care Plans, everyday communication with staff. School staff should be vigilant for signs that a learner may subject to bullying behaviours

Prevention

Briarwood uses the following approach to support the children/young people to understand what is meant by the definitions of bullying and help to create an ethos of inclusivity and acceptance.

We aim to support and teach skills to increase desirable behaviours through the development of individual Engagement targets, bespoke Optimum Learning Maps (See Pastoral & Behaviour Policy) and our Myself Curriculum (See Curriculum Policy) which incorporates the new Relationships and Sex Education (RSE) and Health Education curriculum. An additional focus is placed on celebrating difference and encouraging the children and young people to choose kindness and respect. As a school we have committed to following the 10 Key Principles (Appendix 1) to prevent and respond to bullying as set out by the Anti-Bullying Alliance. This is underpinned by the school's commitment to provide a trauma informed approach, which focus on creating and sustaining positive relationships and practises which protect, relate, regulate and reflect.

Briarwood has a Vulnerable Plus assessment tool that ensures Teachers and School leaders are highlighted to those who are deemed to have additional factors such as PP, LAC, or being within additional groups (see section 2) that would increase vulnerability.

Procedures

At Briarwood we follow the ABA 3 Step Response to Bullying which provides a consistent and reflective approach to respond to bullying incidents.

Step 1 – Safety of those involved

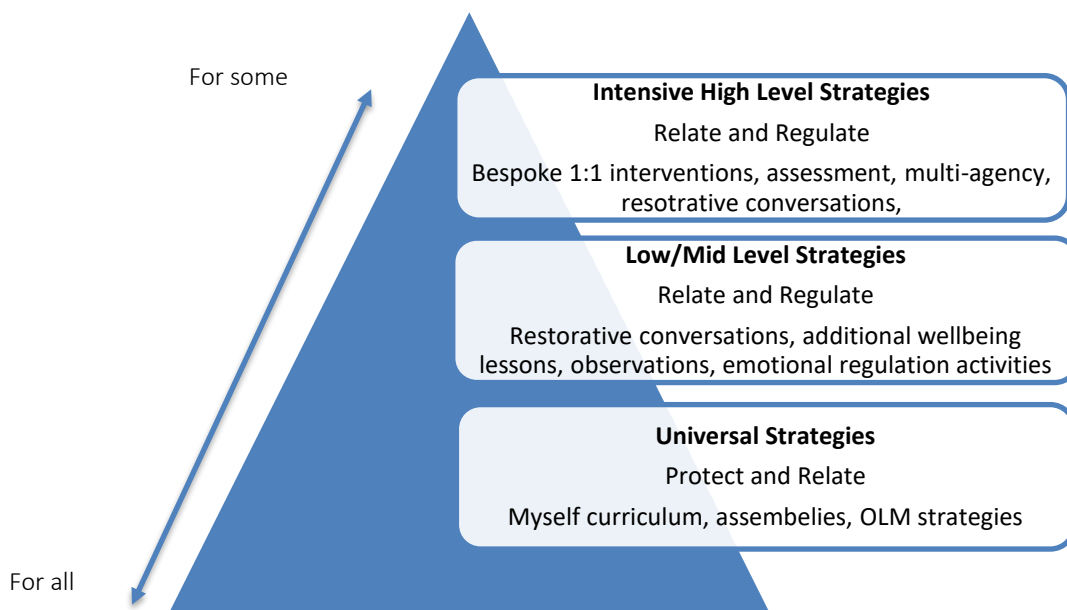
- Secure and ensure the safety and wellbeing of those involved. This includes checking the physical and emotional wellbeing of those involved.
- The victim, alleged perpetrator and witnesses are all interviewed separately.
- Support and reassure the child or young person who has been the victim of the bullying or pupil on pupil incident.
- If a pupil is injured, members of staff take the pupil immediately to the first aider to check on the extent of their injuries.
- Be proactive and act upon early warning signs. If you are concerned that a pupil is being bullied or is the instigator, inform a member of SLT or ELT.
- Members of staff listen/look into carefully to all accounts, being non-confrontational and not assigning blame until the investigation is complete.
- Following a suspected incident of bullying, staff must record the incident on Sleuth as a Pupil on Pupil Incident. All incidents must be reported within 24 hours to a member of ELT or SLT.
- The Heads of School will review and investigate the Pupil on Pupil Incidents and will determine whether any of the inputted incidents were 'bullying behaviours'. The Head of School will then label this incident as bullying on Behaviour Watch and CPOMS.

Step 2 – Prevent from Reoccurring

- Once all those involved are safe a focus will be placed on preventing the incident from reoccurring. Bullying is often a group behaviour and work needs to take place with all involved.
- Following an investigation into the incident detailed observations will be made of the outcomes of the behaviours and links made to establishing possible functions. This information will then be used to identify appropriate strategies to support the development of desirable behaviours for any pupil on pupil or bullying incidents. From this bespoke Optimum Learning Maps will be developed and shared with all appropriate staff involved with the child/children. The possible functions of the behaviour may include:
 - Attention (from the child or from an adult)
 - Task avoidance (the child may not want to complete the work or demands made)
 - Reinforcement (the child is reinforced by the sensory input)
 - Access to a tangible object (i.e. snatching a toy from another child)
- A set of next steps will include all the actions taken in order to reduce incidents and the interventions that need to be put in place in order to support both the victim and the instigators.
- The type of approach used would differ depending on the level of understanding of the child or young person. Next steps would be based on the three pupil on pupil incident categories:
 - No understanding of the targeted behaviours and/or are a result sensory processing need. Example of next steps would include a sensory processing assessment, access to wellbeing interventions, and increased wellbeing lessons. These will then result in tailored strategies being developed and integrated in to child’s OLM and daily routines.
 - Some capacity to understand right and wrong when they are on baseline and present with little or no inappropriate behaviours. However, once triggered off baseline they may target and hurt others unintentionally with little understanding of the impact of behaviours on others.
Examples of next steps would include access to emotional health and wellbeing interventions, Motional assessment and psychoeducation activities with a focus on self-regulation strategies. Opportunities to debrief to discuss the impact of their actions and involvement in the process of identifying self-regulation strategies.
 - Pre-planned, targeted behaviours with intent to harm others.
Examples of next steps would include restorative conversations, Motional assessment, access to emotional health and wellbeing interventions and psychoeducation. Opportunities to debrief to discuss the impact of their actions and how their feelings may be managed differently in the future.
- It is important to support the child who is the target of the bullying behaviour, particularly as they may have difficulty communicating about their experiences. Opportunities will be created for the child to communicate with adults how they may be feeling though the use of their preferred communication systems (PECs, Makaton signing, symbol books). Social stories may also support the child’s understanding of the situation and associated emotions.
- Emotional Health and Wellbeing interventions will provide targeted support for identified children. The school has specially trained trauma and mental health informed practitioners to support children in 1:1 session, in class or small groups as well as employing a Child Therapist who is able to provide additional support.

- Parents and Carers will be informed of the incidents and the steps that the school will be putting into place to support all children involved.
- Staff are important role models for the children. The behaviour of adults towards each other and towards the children is a potentially highly effective tool for preventing and for decreasing bullying behaviours. It is the expectation that all staff adhere to positive practises.

Response Framework



Step 3 – School Learning and Reflection

- Heads of Schools will formally monitor incidents of bullying each term and produce an incident analysis report, which also includes an action plan. This will be shared with the Head of Inclusion.
- Positive Behaviour Support strategies and Optimum Learning Maps will be under constant informal review within class teams.
- Pupil on pupil incidents will be reviewed termly and crossed referenced with Vulnerable Plus and attendance data.
- Monitoring information will be reported to school governors twice a year.
- A debrief will be provided to all those involved and there will be an opportunity for reflection.
- All pupils at Briarwood School will be provided with a meaningful way to comment and feedback on how safe they feel in school. This will be supported by strategies and resources created through Pupils Voice. The information gained will be used to inform future school improvement.
- Whole school monitoring will consider what the incidents have taught us, if there are any training requirements as a result of the analysis and whether the policies and procedures need refreshing

- Once the bullying actions have been implemented these will be followed up termly to ensure the plans are effective long term for the pupils

Cyberbullying (In reference to KCSIE updates – for further information on E-safety, please see our E-safety Policy)

Cyberbullying can take many forms and can go even further than face-to-face bullying by invading personal space and home life, and can target more than one person. It can also take place across age groups and target pupils, staff and others, and may take place inside school, within the wider community, at home or when travelling. It can sometimes draw bystanders into being accessories.

Cyberbullying can include the following:

- Threatening, intimidating or upsetting text messages
- Threatening or embarrassing pictures and video clips
- Disclosure of private sexual photographs or videos with the intent to cause distress
- Silent or abusive phone calls
- Using the victim’s phone to harass others, to make them think the victim is responsible
- Threatening or bullying emails, possibly sent using a pseudonym or someone else’s name
- Menacing or upsetting responses to someone in a chatroom
- Unpleasant messages sent via instant messaging
- Unpleasant or defamatory information posted to blogs, personal websites and social networking sites, e.g. Facebook

NB. The above list is not exhaustive, and cyberbullying may take other forms.

The school views cyberbullying with the same severity as any other form of bullying and will follow the sanctions set out in this policy if they become aware of any incidents.

All members of staff will receive training on the signs of cyberbullying, in order to identify pupils who may be experiencing issues and intervene effectively.

Staff will be alert to the following signs that may indicate a pupil is being cyberbullied:

- Avoiding use of the computer
- Being on their phone routinely
- Becoming agitated when receiving calls or text messages

Staff will also be alert to the following signs which may indicate that a pupil is cyberbullying others:

- Avoiding using the computer or turning off the screen when someone is near
- Acting in a secretive manner when using the computer or mobile phone
- Spending excessive amounts of time on the computer or mobile phone
- Becoming upset or angry when the computer or mobile phone is taken away

Staff will be aware that a cyberbullying incident might include features different to other forms of bullying, prompting a particular response. Significant differences may include the following:

- **Possible extensive scale and scope** – pupils may be bullied on multiple platforms and using multiple different methods that are made possible by virtue of the bullying taking place online
- **The anytime and anywhere nature of cyberbullying** – pupils may not have an escape from the torment when they are at home due to the bullying continuing through technology at all times
- **The person being bullied might not know who the perpetrator is** – it is easy for individuals to remain anonymous online and on social media, and pupils may be bullied by someone who is concealing their own identity
- **The perpetrator might not realise that their actions are bullying** – sometimes, the culture of social media, and the inability to see the impact that words are having on someone, may lead to pupils crossing boundaries without realising
- **The victim of the bullying may have evidence of what has happened** – pupils may have taken screenshots of bullying, or there may be a digital footprint that can identify the perpetrator

Staff will report incidents to their line manager or the headteacher for the incident to be investigated and support to be provided. Pupils will report incidents to a trusted member of staff.

The school will support pupils who have been victims of cyberbullying by in accordance with the “procedure” section of this policy.

In accordance with the Education Act 2011, the school has the right to examine and delete files from pupils’ personal devices, e.g. mobiles phones, where there is good reason to do so. This power applies to all schools and there is no need to have parental consent to search through a young person’s mobile phone. In these cases, the school’s Searching, Screening and Confiscation Policy will be followed.

Working with Families

Close work with parents and carers is an essential part of our work at Briarwood. Parents need to be confident that any concern of bullying will be investigated and dealt with appropriately in a timely manner.

At Briarwood School we aim to:

- Actively listen to all involved
- Develop good communication and work in partnership towards a solution
- Respond quickly once a concern is raised
- Act and use active support
- Create a positive school-wide ethos where bullying behaviours will be actively discouraged
- Provide training and share anti-bullying information with the school community
- Develop clear policies and procedures
- Provide holistic support to those involved

Parents / Carers please let the school know if there was an incident at school that your child/ young person is anxious about and we will work together to resolve any issues arising from the incident. If as parent/ carer you are concerned about your child / young person at school please contact the school and ask to speak to a member of SLT or the class teacher.

Reference List

Anti-Bullying Alliance (ABA) – <https://www.anti-bullyingalliance.org.uk/>

Department for Children, Schools and Families (2008) “Safe to Learn – Bullying of Children with Special Educational Needs and Disabilities – Embedding Anti-Bullying work in School”

Department of Education (2017) ‘Preventing and tackling bullying, Advice for Headteachers, staff and governing bodies’

DfE (2011) Research Brief: “The Use and Effectiveness of Anti-Bullying Strategies in School”

DfE (2017) “Preventing and Tackling Bullying”

GOV.UK (2017) “Bullying at School”

Appendix

Appendix 1 – Anti-Bullying Alliance (ABA) 10 Key Principles

Review Date: Feb 26

Appendix 1

10 Key Principles

Briarwood School:

1. **listens** - all pupils and parents and carers are listened to and influence strategies and approaches to prevent, report and respond to incidents of bullying.

2. **includes us all** - all pupils, including those with SEND, are included, valued and participate fully in all aspects of school life.
3. **respects** - all school staff are role models to others within the school in how they treat others.
4. **challenges** - all forms of discriminatory language – including disablist language – is challenged taken seriously.
5. **celebrates difference** – difference is actively and visibly celebrated and welcome across the whole school.
6. **understands** - all school staff, pupils and parents and carers understand what bullying is and what it isn't.
7. **believes** - all pupils, including disabled children and those with SEN, and their parents and carers are acknowledged, believed and taken seriously when reporting incidents of bullying.
8. **reports bullying** - all pupils within the school and their parents and carers understand how to report incidents of bullying.
9. **acts** - we respond quickly to all incidents of bullying. Pupils, including disabled pupils and those with SEN, participate fully in decisions made about them and help to formulate appropriate action to respond to incidents of bullying.
10. **has clear policies** - our school's anti-bullying policy reflects these principles and is embedded within other school policies. They are widely and actively promoted to school staff, pupils and their parents and carers.