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1. Statement of Policy

Windlesham House School “the School” is committed to providing a safe and caring environment that is free from disruption, violence and any form of harassment so that every one of our pupils can develop to their full potential. All forms of bullying are unacceptable at the School (including cyberbullying, prejudice-based and discriminatory bullying) and any instances of bullying will be recorded and, where appropriate, will result in disciplinary action in accordance with the School's Behaviour Management Policy.

This policy applies to all day and boarding pupils in the School, including those in the Early Years Foundation Stage (EYFS) and applies to actions undertaken both inside and outside of the School.

2. Aims and Objectives

The School community is based upon respect, good manners, and fair play. We are committed to providing a safe and caring environment that is free from disruption, violence, and any form of harassment so that every one of our pupils can develop to their full potential. We expect our pupils to treat members of staff with courtesy and co-operation so that they can learn in a relaxed, but orderly, atmosphere. All pupils should care for and support each other, inside and outside of School.

The School prides itself on its respect and mutual tolerance. Parents/guardians have an important role in supporting the School in maintaining high standards of behaviour. It is essential

that there are consistent expectations of behaviour at school, online and at home, and that the School and parents co-operate closely together.

This policy is available to parents of pupils and prospective pupils on our website with hard copies available on request to the Bursar. It is also communicated to all staff and pupils.

Bullying, cyberbullying, harassment, victimisation and discrimination of pupils or staff will not be tolerated by the School. We treat all of our pupils and their parents fairly, and with consideration, and we expect them to respect the staff, the School and each other, in return. All forms of bullying are unacceptable at the School (including cyberbullying, prejudice-based and discriminatory bullying) and any instances of bullying will be recorded and, where appropriate, will result in disciplinary action in accordance with the School's Behaviour Management Policy.

3. Definition of Bullying

Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally.

Put another way, bullying is the intentional hurting, harming, or humiliating of another person. It may take many forms, including physical (including any threat of or use of violence of any kind), sexual (including the sharing of nude/semi-nude images, videos or live streams online ("nudes/semi-nudes"), verbal (including cyberbullying via text messages, email, social media, gaming, or other instant messages, and can include the use of images and video), and/or emotional (including by excluding, being sarcastic, name-calling, tormenting or spreading malicious rumours).

It can involve manipulating a third party to tease or torment someone, or actions that fall short of direct participation, where someone encourages others to bully, or joins in with laughing at a victim. Bullying is often hidden and subtle.

It can also be overt and intimidating, and often involves an imbalance of power between the perpetrator(s) and the victim(s) whether that be a physical, psychological (knowing what upsets someone), or intellectual imbalance, or by the perpetrator(s) having access to the support of a group, or the capacity to socially isolate the victim(s).

Bullying can sometimes amount to child on child abuse, which is defined as abuse by one or more pupils against another pupil. It can be standalone or as part of wider abuse and can happen both inside and outside of school, and online. Further information about child on child abuse, including the procedures to follow when an incident on child on child abuse is reported can be found in the School's Child Protection and Safeguarding policy.

Bullying is often motivated by prejudice against particular groups and may involve actions or comments regarding a person's race, sex, disability, religion or belief, sexual orientation, gender reassignment, special education needs or certain health conditions, or because of a child's familial circumstances, such as they are adopted, in care or that they have caring responsibilities. Bullying may be motivated by actual differences between children, or perceived differences. For example, bullying can still be homophobic if directed towards a child that is perceived to be gay, whether or not this is the case.

Bullying can happen anywhere and at any time and can involve anyone - pupils, other young people, staff, and parents.

Where an incident of bullying causes or is likely to cause significant harm to a pupil, the School will follow the procedures set out in the School's Child Protection and Safeguarding Policy.

4. The School's Response to Bullying

At the School, we always treat bullying very seriously. It conflicts sharply with the School's social and moral principles, and potentially with its policy on equal opportunities for pupils and will not be tolerated. When incidents of bullying do occur, they are dealt with quickly and taken seriously. The School will never dismiss or downplay bullying as banter or horseplay, and all reported incidents of bullying will be dealt with by staff in accordance with this policy. Staff will reassure any victim(s) that they are being taken seriously and that they will be supported and kept safe.

The School understands that bullying can be so serious that it may cause physical, emotional, and psychological damage, such as eating disorders, self-harm and even suicide. Stopping violence and ensuring the immediate physical safety of pupils is the School's first priority, however, the School acknowledges that emotional bullying can be more damaging than physical bullying, and therefore staff will use their discretion when dealing with an incident of bullying within the parameters of this policy and the Behaviour Management Policy.

Whilst bullying itself is not a specific criminal offence, there are criminal laws which apply to harassment, sexual violence and assault, sexting, the sharing of nudes/semi-nudes (in certain circumstances), upskirting and to violent and threatening behaviour. No one deserves to be a victim of bullying: everybody has the right to be treated with respect.

The School recognises that children with SEND or certain health conditions can face additional safeguarding challenges and may be more prone to peer on peer group isolation or bullying (including prejudice-based bullying) than other children. The School also recognises that certain children may face additional barriers to reporting an incident because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

Pupils who are victims of bullying will always be supported and will be reassured that they will be kept safe. Pupils who have engaged in bullying behaviour will be subject to appropriate disciplinary sanction and will also, where possible, be supported in learning different ways of behaving and offered support for their own circumstances, where appropriate.

Bullying which occurs on School trips, online, or outside of the School's premises will not be tolerated any more than bullying on School premises. Teachers will, where appropriate, discipline pupils for misbehaviour online, outside School premises and outside School hours.

5. Signs of Bullying

Changes in behaviour that may indicate that a pupil is being bullied include:

- Unwillingness to return to school;
- Displays of excessive anxiety, becoming withdrawn or unusually quiet;
- Failure to produce work, or producing unusually poor work, or work that appears to have been copied, interfered with, or spoilt by others;
- Books, bags, money, and other belongings suddenly go "missing", or are damaged;

- Change to established habits (e.g. giving up music lessons, change to accent or vocabulary);
- Diminished levels of self-confidence;
- Frequent visits to the Medical Centre with symptoms which may relate to stress or anxiety, such as stomach pains or headaches;
- Unexplained cuts and bruises;
- Frequent absence, erratic attendance, or late arrival to class;
- Choosing the company of adults rather than peers;
- Displaying repressed body language and poor eye contact;
- Difficulty in sleeping or experiencing nightmares; or
- Talking of suicide or running away from home or school.

Although there may be other causes of some of the above symptoms, a repetition or combination of these possible signs of bullying should be investigated by parents and teachers and reported / recorded, as appropriate, in accordance with this policy.

6. Bullying - Preventative Measures

The School's response to bullying does not start at the point in which a pupil has been bullied. We take the following preventative measures in order to create an environment that prevents bullying from becoming a problem at the School in the first place:

Pupils

- The School promotes an ethos of good behaviour where pupils treat each other with respect at all times, inside and outside of school;
- All new pupils (including boarders and EYFS pupils) are briefed thoroughly on the School's expected standards of behaviour. They are told what to do if they encounter bullying. Those who report bullying in good faith will not be punished, will be taken seriously and will be supported and kept safe;
- We use appropriate assemblies to explain the School's policy on bullying (including sexual harassment and violence, cyberbullying, prejudice-based and discriminatory bullying). Our PSHE programme is structured to give pupils an awareness of their social and moral responsibilities as they progress through the School. The programme is structured to enforce messages about community involvement and taking care of each other. It focuses on the importance of equality and diversity and pupils are encouraged to avoid prejudicial and exclusionary language;
- Other lessons highlight the issue of bullying and reinforce this message by developing social skills and by teaching moral and spiritual values that show all bullying to be unacceptable;
- All of our pupils are encouraged to tell any member of staff at once if they are being bullied, or if they know or suspect that bullying is taking place. They are reassured that they will be taken seriously and will be supported and kept safe;
- The School encourages a culture of listening to the children and their views and has in place two independent listeners (Mr James Eagle and Mrs Kate Rainbow) who children are able to contact from phones around the school. There are signs up displaying the independent listener's numbers.
- In addition to the independent listener, the children are able to talk to a variety of staff and peers should they have concerns. These include their Form Teacher, Head of

House, Boarding staff, Peer Listeners or indeed any member of staff they feel comfortable talking with.

- The School buildings and all of our boarding houses display advice on where pupils can seek help, including details of confidential help lines and websites where they can connect with external specialists, such as ChildLine.
- We provide leadership training to our senior pupils which specifically covers the importance of offering support and assistance to younger and to vulnerable pupils; and
- The School does not tolerate peer-group "initiation ceremonies" or hazing type violence or rituals designed to cause pain, anxiety or humiliation to pupils, and all staff remain alert to such actions.

Staff

- Upon induction, all new teaching members of staff are given training and guidance on the School's anti-bullying policy and on how to react to, and record allegations of bullying at the School, including cyberbullying, prejudice-based and discriminatory bullying. The School will ensure that all School staff understand the principles of the School's policy, the School's legal responsibilities, actions to be taken to resolve and prevent incidents of bullying from arising or escalating and also details of sources of further support;
- The School recognises that certain children may be more at risk of bullying than others and may require additional support when dealing with an incident of bullying, for example children with SEND and/or certain health conditions, and LGBTQ+ pupils.
- The School will seek to ensure that staff receive appropriate training to be able to understand the specific needs of our pupils, and to enable all staff to provide an inclusive environment for all pupils;
- All reported incidents are recorded and investigated at once. We monitor reported incidents and records of any incidents are kept securely in the office of the Deputy Head (Pastoral) in order that patterns of behaviour can be identified and monitored;
- We have a strong and experienced pastoral team of Tutors, Phase Leaders who support the Deputy Head (Pastoral) and are trained in handling any incidents as an immediate priority, and who are alert to possible signs of bullying and will know when to apply our Child Protection / Safeguarding policy to bullying incidents;
- Our pastoral team gives support and guidance to other staff on handling and reporting incidents, and on the follow-up work with both victims and bullies. This area of training is covered in INSET sessions by relevant members of the SLT.
- Staff are always on duty at times when pupils are not in class and patrol the School site. They are trained to be alert to inappropriate language or behaviour at all times;
- In boarding houses, there are strong teams of staff supporting the Heads of Boarding and Matrons, who act *in loco parentis*. Staff are aware that boarding houses provide more opportunities for bullying and are therefore always vigilant and alert to signs of issues with or between boarders. The informal house environment is important in reinforcing a pupil's standards and values, providing the opportunity for friendly, informal discussion of matters of concern to the individual pupil outside the formal classroom. A member of the boarding house staff is always on duty to supervise the pupils. The School will comply with its obligations as set out in the National Minimum Standards at all times.
- The School has the right, and duty, to investigate incidents of bullying involving our pupils which take place outside School hours, on School visits and trips, online, or that otherwise occur outside of School. The School has the right to take disciplinary measures in respect of such incidents. Disciplinary measures will be taken in accordance with the School's Behaviour Management Policy and will be applied in a fair,

consistent, and reasonable manner, taking into account the needs of pupils with SEND and certain health conditions, and vulnerable pupils; and

- Staff will always consider the motive behind bullying behaviour and whether it raises any concerns for the welfare of the perpetrator(s). If staff reasonably suspect that a pupil may be suffering, or is likely to suffer significant harm, they should follow the procedures set out in the School's Child Protection and Safeguarding Policy and discuss their concerns with the School's Designated Safeguarding Lead (DSL) without delay.

Parents

- This policy is readily available on the School's website and by hard copy on request to the school bursar;
- We encourage close contact between the Form Tutors (and Phase Leaders) and parents/guardians, and will always make contact if we are worried about a pupil's well-being;
- If parents know or suspect that their child, or another pupil, is being bullied, they should contact the School without delay. All concerns will be taken seriously; and
- We welcome feedback from parents and guardians on the effectiveness of our preventative measures and all other aspects and implementation of this anti-bullying policy.

7. Procedures for Dealing with Reported Bullying

The School ensures that all instances of, or concerns about bullying and cyberbullying, both on and away from School premises are easy to report and that they are recorded properly. Records of instances of bullying and allegations of bullying will be kept on the Deputy Head (Pastoral) files, and also on pupil files. Records will also be kept on files relating to safeguarding where appropriate, in order to enable the School to identify patterns of behaviour and to evaluate the effectiveness of this anti-bullying policy.

The School recognises that pupils are likely to report bullying to someone they trust: this could be any member of staff. The School also recognises that children may not find it easy to tell staff about bullying verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. Staff will be trained in handling an allegation and will be aware that they must listen to the pupil, not ask leading questions, and make a written record of the allegation to the best of their ability.

The School also recognises that a first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports seriously regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the victim(s) when they raise a concern.

If an incident of bullying is reported, the following procedure will be adopted:

1. The member of staff to whom the incident was reported, or who first discovers the situation, will control the situation (the "Case Handler"), and will reassure and support the pupils involved, without promising absolute confidentiality;

2. The Case Handler will inform an appropriate member of the School's pastoral team about the bullying allegation as soon as possible;
3. Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm', staff should follow the procedures set out in the School's Child Protection/Safeguarding Policy rather than the procedure set out below.
4. The victim(s) and the alleged perpetrator(s) will each be interviewed individually by the Case Handler on their own (or, if appropriate, with a suitable person present for support) and asked to write/explain their account of events;
5. Where the Case Handler considers that the reported bullying behaviour may be criminal, or considers that there may be a risk of harm to someone, the Case Handler will discuss this with the Head, and will report the matter to the Police without delay, if considered necessary. The School will then follow the procedures set out in the Child Protection and Safeguarding Policy as well as any guidance from the Police;
6. The incident/s should be recorded on 'My Concern' and dated by the Case Handler. It should then be given to the Deputy Head (pastoral) who is responsible for securely storing all records of bullying and other serious disciplinary offences. If it is not practicable to use the incident form, the incident must still be written down, signed, and dated by the Case Handler, and held securely by the Deputy Head (pastoral)
7. The Deputy Head (pastoral) will inform tutors and Phase Leaders of both the alleged perpetrator(s) and the victim(s) as soon as possible. In very serious incidents, the Head should be informed;
8. The victim(s) will be interviewed again at a later stage by a member of the pastoral team, separately from the alleged perpetrator(s). They will be offered support to develop a strategy to help. It will be made clear to them why revenge or retaliation is inappropriate;
9. The perpetrator(s) will be interviewed again at a later stage by a member of the pastoral team, separately from the victim(s), and it will be made clear why their behaviour was inappropriate and caused distress. They will be offered guidance on modifying their behaviour. The School's Behaviour Management Policy may also be invoked. Sanctions under the Behaviour Management Policy and/or Discipline and Exclusions Policy might include, for example, detention and withdrawal of privileges. The School may exclude a pupil, either temporarily or permanently, in cases of serious or persistent bullying, or in the event that the support put in place for the perpetrator(s) does not result in the modification of behaviour to an acceptable level.
10. The parents/guardians of all parties will be informed and may be invited into School to discuss the matter, and the appropriate sanctions under the Behaviour Management Policy and/or Exclusion, Removal and Review Policy. The parents' support will be sought in respect of preventative measures, and any concerns of either party will be addressed;
11. A way forward, including where appropriate disciplinary sanctions and support for the perpetrator(s), should be determined, and where possible agreed with all parties. This should recognise that suitable support may be needed by the pupils who are being bullied, and also by the pupils who bully others, as well as dealing with disciplinary measures in accordance with the School's Behaviour Management Policy and/or Exclusion, Removal and Review Policy if appropriate;

12. As part of this process, a meeting involving all the parties, with close staff supervision, may be convened to help develop a strategy which enables all concerned to close the episode;
13. A monitoring and review strategy will be put in place and put on record. This will include consideration and implementation of any lessons learnt
14. In many cases it will be possible to resolve issues internally under this policy and the School's Behaviour Management Policy. However, it may be necessary to make a report to the Police (regarding Criminal Cases) and to Children's Services (regarding very serious cases). Reporting would only take place after the Head has been involved. The DSL will be involved from the start in cases that concern safeguarding.

8. Cyberbullying

Cyberbullying can be defined as "*the use of information and communication technologies to support deliberate, repeated, and hostile behaviour by an individual or group that is intended to harm others*" (Belsey, <http://www.cyberbullying.org/>). It is an aggressive, intentional act often carried out repeatedly over time, and often against a victim who cannot easily defend themselves. The School acknowledges that cyberbullying may take place inside School, outside of School and at any time of the day.

Cyberbullying could involve communications by various electronic media, including for example:

- Texts, instant messages or calls on mobile phones;
- The use of mobile phone camera images to cause distress, fear, or humiliation;
- Posting threatening, abusive, sexual, discriminatory, offensive, or humiliating material or comments on websites (including blogs, personal websites, and social networking sites such as Facebook, Instagram, Twitter or YouTube);
- Using e-mail to message others in a threatening or abusive manner; or
- Hijacking/cloning e-mail accounts.

The School acknowledges that cyberbullying may take many different forms including: cyberstalking, exclusion or peer rejection, impersonation, unauthorised publication of private information or images, encouraging derogative comments on online platforms, sharing nudes/semi-nudes, upskirting, and sexting.

The School has a role to play in teaching pupils about the underpinning knowledge and behaviours that can help them to navigate the online world safely and confidently regardless of the device, platform, or app. In taking this forward, the School has regard to the DfE's non-statutory guidance on *Teaching online safety in school* (June 2019, updated 12 January 2023).

Prevention of cyberbullying

For the prevention of cyberbullying, in addition to the measures described above, the School:

- Expects all pupils to adhere to its Online Safety Policy. Certain sites are blocked by our filtering system and our IT Department monitors pupils' use;
- May impose disciplinary sanctions for the misuse, or attempted misuse, of the internet in accordance with the 'Pupil user agreements'

- Issues all pupils in years 3 up with their own personal School email address. Access to all social media sites, instant messaging and personal email sites is blocked from School computers/ tablets inside the School
- Offers guidance on the safe use of social networking sites and cyberbullying in PSHE lessons, which covers blocking, removing contacts from "friend" lists and sharing their personal data;
- Ensures its pupils are aware of the various forms in which cyberbullying can take place, that it can have severe and distressing consequences, and that participation in cyberbullying will not be tolerated;
- Offers guidance on keeping names, addresses, passwords, mobile phone numbers and other personal details private and secure;

Procedures for dealing with cyberbullying

The School will follow the procedures set out in this policy and in the Child Protection and Safeguarding Policy where relevant for incidents of cyberbullying, taking such disciplinary action that is considered reasonable in the circumstances, with a view to regulating pupil conduct and protecting the reputation of the School, and the welfare of its pupils.

Although cyberbullying is not a specific criminal offence, there are however criminal laws that may apply to communications of a harassing or threatening manner or the unauthorised publication of private images, upskirting, sharing nudes/semi-nudes, and sexting. Where the School considers that a reported incident of cyberbullying may amount to a criminal offence, it will inform the Police.

Electronic devices

In response to an allegation of cyberbullying, certain staff are permitted to conduct a search for electronic devices, such as a pupil's mobile phone, with the authority of the Head. The search will be conducted in accordance with the procedure set out in the Searching Pupils and their Possessions Policy.

Where a search finds an electronic device that is prohibited by the School rules, or where the member of staff undertaking the search reasonably suspects that the electronic device has been, or is likely to be, used to commit an offence or cause personal injury or damage to property, the School may examine any data or files on the device, where there is good reason to do so, for example, where there has been an allegation of cyberbullying. Parental consent to search through electronic devices is not required, but they will be informed after the event unless doing so presents a further risk to any child.

The School may also erase any data or files from the device if the School considers there to be good reason to do so, unless there are reasonable grounds to suspect that the device may contain evidence in relation to a criminal offence, where the files should not be deleted and the device must be given to the Police without delay.

If, following a search, the member of staff determines that the device does not contain any evidence in relation to a criminal offence, or are advised by the Police following a report to them

that they will not take any further action to investigate an alleged offence, the School can decide whether it is appropriate to delete any files or data from the device. Alternatively, the School may retain the device as evidence of a breach of this policy and the Behaviour Management Policy and the School rules. The School may then take steps to punish the student in accordance with the Behaviour Management Policy, where appropriate. In the event that the search highlights a safeguarding concern in respect of any pupil, the School will follow the procedures set out in the School's Child Protection and Safeguarding Policy.

9. EYFS Children

Even the School's youngest children are encouraged to behave towards each other with kindness and consideration. They are encouraged to learn to look after their own possessions and to respect others' possessions. We expect them to be honest, helpful, and polite, and to work hard and to listen to others. They should respect everyone and learn to value differences and diversity. Jane Johnstone, Pre-Prep Phase Leader, is in charge of the management of behaviour in the EYFS setting.

We explain to our EYFS children why some forms of behaviour are unacceptable and hurtful to others. Sanctions for the youngest children are age appropriate and would involve discussion and support for modifying behaviour. Occasionally, it may be deemed appropriate for a child to be sent to see Jane Johnstone, Pre Prep Phase Leader, who will explain the inappropriateness of a particular action and introduce a more appropriate action. Parents are always informed when any sanction or reproof is needed towards their child, and in cases of repeated instances of hurtful or inappropriate behaviour, parents will be invited into the School to discuss the situation with the child's teacher and the Head of Pre-Prep, to agree a joint way of handling the difficulty.

The School Behaviour Management Policy applies to EYFS children and can be found on our website.

10. Complaints Procedure

Parents and pupils are encouraged to use our Complaints Procedure (which is published on our website) if they feel that any concerns about bullying (or anything else) are not being addressed properly. Parents of boarders and of EYFS children should be aware that they have the right to refer a complaint directly to Ofsted, if they are unhappy with the way in which their complaint has been handled (the Complaints Procedure explains how to complain to Ofsted).

11. Monitoring and Review

The School will record all incidents of reported bullying in accordance with this policy.

The Deputy Head (Pastoral) will review all incidents of reported bullying to help identify patterns of behaviour, so that the School can take appropriate steps to address bullying behaviours within the School. Records of bullying incidents will also be used to evaluate the effectiveness of the School's anti-bullying procedures, and to highlight any necessary amendments. This will include trends and patterns in any bullying incidents being a standing agenda item at Senior Leadership Team meetings.

This policy is reviewed by the Governing Body on an annual basis.