PREVENTING BULLYING POLICY

Potters Bar Clinic School

Policy Number: **1.5**

Version Number: **4.0**

Date of Issue: **September 2025**

Date of Next Review: **September 2026**

Author: **JANICE WILLIAMS, HEADTEACHER**

Ratified by: **NICK ROSE, HEAD OF EDUCATION**

Elysium Children and Education is committed to promoting equality in all its activities. We aim to provide an environment free from discrimination and unfair treatment.

Contents

1. Introduction 3
2. Legal framework 3
3. Definitions 4
4. Types of bullying 4
5. Roles and responsibilities 5
6. Statutory implications 7
7. Prevention 8
8. Signs of bullying 8
9. Staff Principles 8
10. Preventing Peer-on-Peer/ Child on Child Sexual Abuse 9
11. Confidentiality 11
12. Cyber bullying 11
13. Procedures 11
14. Sanctions 12
15. Support 12
16. Follow-up support 13
17. Bullying outside of school 14
18. Monitoring and review 14
19. Monitoring 15

1. Introduction

This policy is intended for Potters Bar Clinic School, a division of Elysium Children and Education.

The school believes that all students are entitled to learn in a safe and supportive environment; this means being free from all forms of bullying behaviour. This policy outlines how instances of bullying are dealt with, including the procedures to prevent occurrences of bullying. These strategies, such as learning about tolerance and difference as part of the curriculum, aim to promote an inclusive, tolerant and supportive ethos within each service.

The Education and Inspections Act 2006 outlines a number of legal obligations regarding our response to bullying. Under section 89, schools must have measures in place to encourage good behaviour and prevent all forms of bullying amongst students. These measures are part of our Positive Behaviour Policy, which is communicated to all stakeholders. All staff, parents/carers and students work together to prevent and reduce any instances of bullying at Elysium Children and Education. There is a zero-tolerance policy for bullying at Potters Bar Clinic School.

2. Legal framework

This policy has due regard to all relevant legislation 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

This policy has been written in accordance with guidance, including, but not limited to:

- DfE (2017) 'Preventing and tackling bullying'
- DfE (2018) 'Sexual violence and sexual harassment between children in schools and colleges'
- DfE (2018) 'Mental health and wellbeing provision in schools'
- DfE (2025) 'Keeping children safe in education' 2025
- DCMS, DSIT, and UK Council for Internet Safety (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'

This policy operates in conjunction with the following Potters Bar Clinic School policies:

- Behaviour Policy
- Child Protection and Safeguarding Policy
- Social, Emotional and Mental Health (SEMH) Policy
- Child-on-child Abuse Policy

3. Definitions

- For the purpose of this policy, "bullying" is defined as persistent behaviour by an individual or group with the intention of verbally, physically, or emotionally harming another person or group.
- Bullying is generally characterised by:
    - **Repetition**: Incidents are not one-offs; they are frequent and happen over a period of time.
    - **Intent**: The perpetrator(s) means to cause verbal, physical or emotional harm; it is not accidental.
    - **Targeting**: Bullying is generally targeted at a specific individual or group.
    - **Power imbalance**: Whether real or perceived, bullying is generally based on unequal power relations.
- Vulnerable young people 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 young people may include, but are not limited to:
    - Young people with SEND.
    - Young people who are adopted.
    - Young people suffering from a health problem.
    - Young people with caring responsibilities.

4. Types of bullying

- Many kinds of behaviour can be considered bullying and can be related to almost anything.
- Teasing another young person because of their appearance, religion, ethnicity, gender, sexual-orientation, home life, culture, disability, or SEND are some of the types of bullying that can occur.
- Bullying is acted out through the following mediums:
    - Verbally
    - Physically
    - Emotionally
    - Online (Cyber)

- **Racist bullying:** Bullying another person based on their ethnic background, religion or skin colour. Racist bullying is a criminal offence under the Crime and Disorder Act 1998 and Public Order Act 1986.
- **Homophobic bullying:** Bullying another person because of their actual or perceived sexual orientation.
- **Transphobic bullying:** Bullying based on another person's gender 'variance' 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/dynamic that subordinates, humiliates or intimidates another person. This is commonly underpinned by sexist attitudes or gender stereotypes.

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

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

5. Roles and responsibilities

- The **Management Committee** is responsible for:
    - Evaluating and reviewing this policy to ensure that it is not discriminatory.
    - The overall implementation of this policy.
    - 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.
    - Ensuring that pupils are taught how to keep themselves and others safe, including online.

The **Headteacher** is responsible for:

- Reviewing and amending this policy, accounting for new legislation and government guidance, and using staff experience of dealing with bullying incidents in previous years to improve procedures.
- Keeping a Bullying log as part of the Safeguarding & Serious incident log of all reported incidents, including which type of bullying has occurred, to allow for proper analysis of the data collected.
- To ensure systems and processes are put in place to minimise the risk of bullying continuing in the school from the ward.
- Analysing the data in the bullying record at termly intervals to identify trends, so that appropriate measures to tackle them can be implemented and these reported to the Management Committee.
- Arranging appropriate training for staff members.

Key Teachers are responsible for:

- Corresponding and meeting with consultants, ward managers and nurse-in-charge where necessary.
- Supporting young people who need educating around what bullying is if they are found to be bullying other young people, or victims of bullying.

Keeping in Touch Teacher (KIT) are responsible for:

- Being available for young people who wish to report bullying.
- Providing follow-up support after bullying incidents.
- Being alert to possible bullying situations, particularly exclusion from friendship groups, and that they inform the young persons' ward manager & consultant of such observations.
- Refraining from gender stereotyping when dealing with bullying.
- Understanding the composition of pupil groups, showing sensitivity to those who have been the victims of bullying.
- Supporting young people in school who are victims of bullying to ensure they feel safe and supported in school following any altercations with other young people, so that they are still able to access school.
- To follow any risk assessments put in place by the ward staff or SLT to ensure young people are kept apart in school as necessary.

Teachers are responsible for:

- Being alert to interactions between young people in their class or on the ward when lessons are taking place on the ward
- Being available for young people who wish to report bullying.
- Providing follow-up support after bullying incidents.
- Being alert to possible bullying situations, particularly exclusion from friendship groups, and that they inform the young persons' ward manager & consultant of such observations.
- Refraining from gender stereotyping when dealing with bullying.
- Understanding the composition of pupil groups, showing sensitivity to those who have been the victims of bullying.
- Supporting young people in school who are victims of bullying to ensure they feel safe and supported in school following any altercations with other young people, so that they are still able to access school.
- To follow any risk assessments put in place by the ward staff or SLT to ensure young people are kept apart in school as necessary.
- To support the ward with any reconciliations that may be facilitated between young people as key teachers
- Reporting any instances of bullying once they have been approached by a young person for support on a safeguarding form.

The responsible clinician and/or clinical psychologist is responsible for:

- Offering emotional support to victims of bullying.

Young People are responsible for:

- Informing a member of staff if they witness bullying or are a victim of bullying.
- Not making counter-threats if they are victims of bullying.
- Keeping evidence of cyber bullying and informing a member of staff should they fall victim to cyber bullying.

6. Statutory implications

The school understands that, under the Equality Act 2010, it has a responsibility to:

- Eliminate unlawful discrimination, harassment, including sexual harassment, victimisation and any other conduct prohibited by the act.
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it.
- Foster good relations between people who share a protected characteristic and people who do not share it.
- The school understands that, under the Human Rights Act (HRA) 1998, it could have charges brought against it if it allows the rights of children and young people at the school to be breached by failing to take bullying seriously.
- The Headteacher will ensure that this policy complies with the HRA; the Headteacher understands that they cannot do this without fully involving their teaching staff and the clinical team.
- Although bullying itself is not a criminal offence, some types of harassment, threatening behaviour and/or communications may be considered criminal offences:
    - Under the Malicious Communications Act 1988, it is an offence for a person to electronically communicate with another person with the intent to cause distress or anxiety, or in a way which conveys a message which is indecent or grossly offensive, a threat, or contains information which is false and known or believed to be false by the sender.
    - The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct amounting to harassment.
    - Section 127 of the Communications Act 2003 makes it an offence to send, by means of a public electronic communications network, a message, or other matter, that is grossly offensive or of an indecent, obscene or menacing character. It is unlawful to disseminate defamatory information through any media, including internet sites.
    - Other forms of bullying which are illegal and should be reported to the police include: violence or assault, theft, repeated harassment or intimidation and hate crimes.

7. Prevention

- All reported or investigated instances of bullying will be investigated by the senior leadership team
- All types of bullying will be discussed as part of the PSHE curriculum.
- Diversity, difference and respect for others is promoted and celebrated through various lessons.
- All members of the school are made aware of this policy and their responsibilities in relation to it.
- All staff members receive training on identifying and dealing with the different types of bullying.
- The lounge in school, supervised by a teacher or HCA, is available for young people to go to during free time if they feel threatened or wish to be alone.
- All young people will have key teacher contact at a minimum of once a week. Any incidences of bullying that is brought up will be addressed by the key teacher as a serious incident and reported to the Headteacher or Deputy Headteacher as appropriate.
- Key teachers will also offer an 'open door' policy allowing young people to discuss any bullying, whether they are victims or have witnessed an incident.

8. Signs of bullying

- Young people at Potters Bar Clinic are very unwell, and are highly likely to have withdrawn from school previously, or be a previous persistent refuser from school. Many of the signs of bullying that involves possessions being ripped or torn, for example, will not be applicable due to young people not being allowed to bring their own equipment to school. However, staff will be alert to the following signs that may indicate a young person is a victim of bullying:
    - Being frightened to come to school (more than normal)
    - Unwillingness to attend school (more than normal)
    - Saying that they feel ill in the morning
    - Decreased involvement (more than normal) in schoolwork
    - Change in behaviour and attitude on the ward, or between peers
- If staff become aware of any factors that could lead to bullying behaviours, they will notify the young person's key teacher, who will investigate the matter and monitor the situation.

9. Staff Principles

- Potters Bar Clinic School will ensure that prevention is a prominent aspect of its anti-bullying vision.
- Staff will treat reports of bullying seriously and they will not ignore signs of suspected bullying.
- Unpleasantness from one young person towards another is always challenged and never ignored.
- Staff act immediately when they become aware of a bullying incident; this applies to all staff, not solely teaching staff.

- Staff always respect young people's privacy, but information about specific instances of bullying are shared with the Headteacher or Deputy Headteacher, and Responsible Clinician. If there is a safeguarding concern, the appropriate safeguarding processes are followed.
- If a member of staff believes a young person is in danger, e.g. of being hurt, they will inform the DSL immediately.
- Follow-up support is given to both the victim and bully in the months following any incidents, to ensure all bullying has stopped.

10. Preventing Peer-on-Peer/ Child on Child Sexual Abuse

- Potters Bar Clinic School has a zero-tolerance approach to all forms of peer-on-peer sexual abuse, including sexual harassment and sexual violence.
- Sexual harassment refers to unwanted conduct of a sexual nature that occurs online or offline.
- Sexual harassment violates a child's dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence.
- Sexual violence refers to the three following offences:
- **Rape**: A person (A) commits an offence of rape if he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Assault by Penetration**: A person (A) commits an offence if s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Sexual Assault**: A person (A) commits an offence of sexual assault if s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.
- The school's Child Protection and Safeguarding Policy outlines our stance on addressing peer-on-peer sexual abuse, and the procedures in place will be adhered to if any instances of sexual harassment or sexual violence be uncovered.
- To prevent peer-on-peer abuse and address the wider societal factors that can influence behaviour, the school will educate young people about abuse, its forms and the importance of discussing any concerns and respecting others through the curriculum, assemblies and PSHE lessons.

- The school will also ensure that young people are taught about safeguarding, including online safety, as part of a broad and balanced curriculum in PSHE lessons and group sessions. Such content will be age and stage of development specific, and tackle issues such as the following:
    - Healthy relationships
    - Respectful behaviour
    - Gender roles, stereotyping and equality
    - Body confidence and self-esteem
    - Prejudiced behaviour
    - That sexual violence and sexual harassment is always wrong
    - Addressing cultures of sexual harassment
- All staff will be aware that young people of any age and sex are capable of abusing their peers and will never tolerate abuse as “banter” or “part of growing up”.
- All staff will be aware that peer-on-peer/ child on child abuse can be manifested in many ways, including sexting and gender issues, such as girls being sexually touched or assaulted, and boys being subjected to hazing/initiation type of violence which aims to cause physical, emotional or psychological harm.
- All staff will be made aware of the heightened vulnerability of young people with SEND, who are three times more likely to be abused than their peers.
- Staff will not assume that possible indicators of abuse relate to the young person’s SEND and will always explore indicators further.
- LGBT children can be targeted by their peers. In some cases, children who are perceived to be LGBT, whether they are or not, can be just as vulnerable to abuse as LGBT children.
- The school’s response to boy-on-boy and girl-on-girl sexual violence and sexual harassment will be equally as robust as it is for incidents between children of the opposite sex.
- Young people will be made aware of how to raise concerns or make a report and how any reports will be handled – this includes the process for reporting concerns about friends or peers.
- If a child has been harmed, is in immediate danger or is at risk of harm, a referral will be made to children’s social care services (CSCS).

Managing disclosures

- Victims will always be taken seriously, reassured, supported and kept safe.
- Victims will never be made to feel like they are causing a problem or made to feel ashamed.
- If a friend of a victim makes a report or a member of staff overhears a conversation, staff will act – they will never assume that someone else will deal with it. The basic principles remain the same as when a victim reports an incident; however, staff will consider why the victim has not chosen to make a report themselves and the discussion will be handled sensitively and with the help of CSCS where necessary. If staff are in any doubt, they will speak to the DSL.
- The DSL will be informed of any allegations of abuse against young people with SEND. They will record the incident in writing and, working with the SENDCO, decide what course of action is necessary, with the best interests of the young person in mind at all times.

11. Confidentiality

- Potters Bar Clinic School will engage with clinical staff (including the DSO for the hospital) and agencies required to support the victim and/or be involved in any investigation.
- If a victim asks the school not to tell anyone about the disclosure, the school will not make this promise.
- Even without the victim's consent, the information may still be lawfully shared if it is in the public interest and protects children from harm.
- The DSL will consider the following when making confidentiality decisions:
    - Parents will be informed by the clinical team unless it will place the victim at greater risk.
    - If a child is at risk of harm, is in immediate danger or has been harmed, a referral will be made to CSCS.
    - Rape, assault by penetration and sexual assaults are crimes – reports containing any such crimes will be passed to the police.

12. Cyber bullying

- Potters Bar Clinic School has a zero-tolerance approach to cyber bullying.
- The school views cyber bullying in the same light as any other form of bullying and will follow the sanctions set out in section 12 this policy if they become aware of any incidents.
- The school will support young people who have been victims of cyber bullying by holding formal and informal discussions with the young person about their feelings and whether the bullying has stopped, in accordance with section 13 and section 14 of this policy.
- Young people are not allowed mobile phones during the day or at weekends at Potters Bar Clinic, but if there is any suspicion that cyber bullying has taken place on section 17 leave, such an incident will be treated as safeguarding and dealt with as a safeguarding matter.
- During times when remote education is being utilised, the school will frequently be in contact with parents to make them aware of their activities online, but also to reinforce the importance of pupils staying safe online, and explaining how filtering and monitoring procedures work

13. Procedures

- All behaviour incidents are reported on the school's behaviour log as per the Promoting Positive Behaviour Policy. All bullying incidents are treated as Serious Incidents and thus recorded on the Safeguarding and Serious Incident log and the Bullying log within.
- When investigating a bullying incident, the following procedures are adopted:
    - The victim, alleged bully and witnesses are all interviewed separately, with a member of the clinical team (and as far as possible, on the ward)
    - If a young person is injured, members of staff take the young person immediately to the nurse in charge on the ward

  - A room is used that allows for privacy during interviews
  - If appropriate, the alleged bully, the victim and witnesses, are asked to write down details of the incident; this may need prompting with questions from the member of staff to obtain the full picture
  - Premature assumptions are not made, as it is important not to be judgemental at this stage
  - Members of staff listen carefully to all accounts, being non-confrontational and not attaching blame until the investigation is complete
  - All concerned young people are informed that they must not discuss the interview with other young people
- Due to the potential for sexist, transphobic, sexual, etc bullying to be characterised by inappropriate sexual behaviour, staff members involved in dealing with the incident are required to consider whether there is a need for safeguarding processes to be implemented.

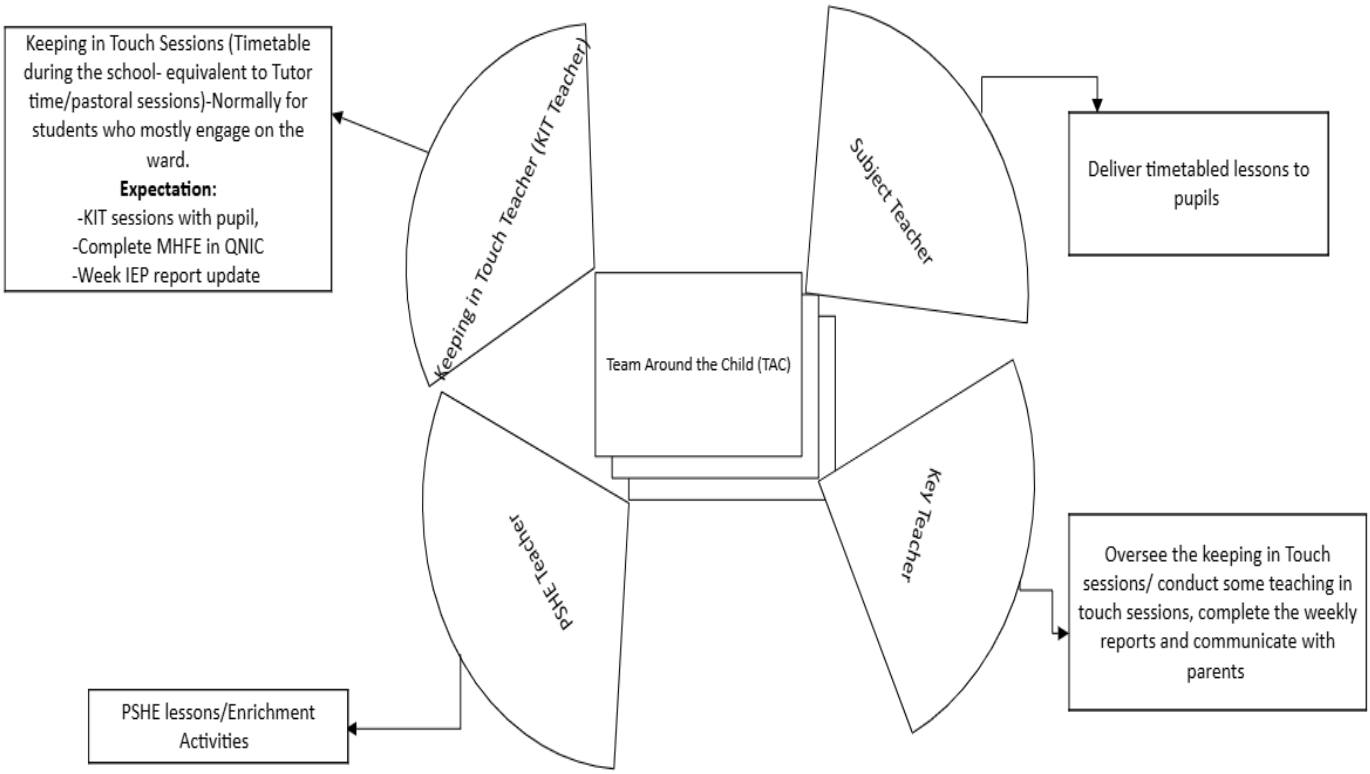
14. Sanctions

- If the Headteacher and Responsible Clinician or other appropriate ward member of staff is satisfied that bullying did take place, the young person will be helped to understand the consequences of their actions and warned that there must be no further incidents.
- The Headteacher and Responsible Clinician or other appropriate ward member of staff informs the young person of the type of sanction to be used in this instance and future sanctions if the bullying continues.
- If possible, the Headteacher and Responsible Clinician or other appropriate ward member of staff will attempt reconciliation and will obtain a genuine apology from the bully. This will either be in writing to the victim (and/or witnesses if appropriate), or face-to-face, but only with the victim's full consent. Discretion is used here; victims will never feel pressured into a face-to-face meeting with the bully.
- The perpetrator is made to realise, by speaking regularly to their key teacher, or other trusted member of staff, that some young people do not appreciate the distress they are causing, and that they should change their behaviour.
- The Headteacher informally monitors the young people involved and reports updates as appropriate in daily handover, ward rounds/IEP reports and Care Programme Approach (CPA's) to parents/carers and members of the multi-disciplinary team.

15. Support

- For as long as is needed after the initial complaint of bullying, the key teacher, KIT Teacher, teachers or other member of ward staff, holds an informal discussion to check whether the bullying has stopped (as often as is appropriate).

Below is a mapping of the Team Around the Child (TAC) that can offer support.



- The key teacher, or other member of ward staff, holds a formal meeting, on a weekly basis at ward round, to check whether the bullying has stopped – these formal meetings will continue to take place until the Headteacher and Responsible Clinician and victim are confident the bullying has stopped.
- If necessary, group dynamics are broken up by members of staff by re-organising timetables for young people.
- The victim is encouraged to tell a trusted adult in school if bullying is repeated.

16. Follow-up support

- The progress of both the bully and the victim are monitored by their key teachers.
- If appropriate, follow-up correspondence is arranged for CPA's.
- Young people who have been bullied are supported in the following ways:
- Being listened to
- Having an immediate opportunity to meet with their key teacher, a member of the clinical team or a member of staff of their choice
- Being reassured
- Being offered continued support

Young people who have bullied others are supported in the following ways:

- Receiving a consequence for their actions
- Being able to discuss what happened
- Being helped to reflect on why they became involved
- Being helped to understand what they did wrong and why they need to change their behaviour
- Appropriate assistance from parents or members of the clinical team

17. Bullying outside of school

- The Headteacher will work in collaboration with the hospital to address bullying outside of school
- Staff will remain aware that bullying can happen both in and outside of school, and will ensure that they understand how to respond to reports of bullying that occurred outside school in line with the Child Protection and Safeguarding Policy and the Child-on-child Abuse Policy.
- In all cases of misbehaviour or bullying, members of staff can only discipline the young person on school premises, or elsewhere when the young person is under the lawful control of the member of staff, e.g. on a school trip.
- The Responsible Clinician and Headteacher is responsible for determining whether it is appropriate to notify the police of the action taken against a young person.
- If the misbehaviour could be of a criminal nature, or poses a serious threat to a member of the public, the police are always informed.

18. Monitoring and review

The DSL will ensure that robust records are kept with regard to all reported or otherwise uncovered incidents of bullying – this includes recording where decisions have been made, e.g. sanctions, support, escalation of a situation and resolutions.

The headteacher and DSL will ensure that all decisions and actions recorded are reviewed on a regular basis for the purposes of:

- Identifying patterns of concerning, problematic or inappropriate behaviour on the part of certain pupils that may need to be handled, e.g. with pastoral support.
- Reflecting on whether cases could have been handled better and using these reflections to inform future practice.
- Considering whether there are wider cultural issues at play within the school, e.g. whether school culture facilitates discriminatory bullying by not adequately addressing instances, and planning to mitigate this.
- Considering whether prevention strategies could be strengthened based on any patterns in the cases that arise.
- Responding to any complaints about how cases have been handled.

19. Monitoring

- Incidents relating to bullying will be monitored as part of the school's overall processes relating to records held for safeguarding and serious incidents. This information will be reported to the Management Committee on a regular basis.
- Each half term pupils are given a questionnaire (Student Satisfaction Survey). Within this are contained two questions regarding bullying. This is monitored by the Headteacher and the Head of Education. Any fluctuation in scores or statements or reports of bullying are investigated immediately.