

REBUILDING CONFIDENCE
REIMAGINING EDUCATION RESTORING FUTURES
IMAGINE
"A BRIGHTER FUTURE"



Anti-Bullying Policy

(including prejudice-based bullying, cyberbullying and child-on-child abuse)

Document reference	Anti-Bullying Policy
School	Imagine Wellbeing School (IW) – Independent SEND Primary
Applies to	All staff (including agency), volunteers, proprietors, visitors, all pupils, on-site, off-site and online where it affects the school
Owner	Headteacher / DSL
Approved by	Proprietor / Governing Body (where applicable)
Publication date	January 2026
Review date	January 2027 (or sooner if guidance changes or incidents indicate)

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1. Statement of intent

At Imagine Wellbeing School (IW), every child has the right to learn, play and develop in a safe environment, free from bullying, harassment and intimidation.

Many of our pupils have additional vulnerabilities because of their SEND profiles (for example, autism, communication needs, sensory processing differences, social understanding difficulties, learning disabilities, SEMH needs, trauma histories, or health needs). Bullying can therefore present in subtle ways, cause significant distress, and undermine attendance, engagement and progress.

IW has a zero-tolerance approach to bullying and discriminatory language or behaviour. We are committed to prevention, early intervention and a swift, consistent response when concerns arise. We will listen to pupils, take all concerns seriously, and ensure appropriate action, support and review.

This policy aims to:

- create a culture of kindness, respect, belonging and psychological safety;
- prevent bullying through curriculum, environment design and proactive supervision;
- make reporting accessible for all pupils, including those who use alternative or augmentative communication (AAC);
- ensure consistent, fair and SEND-informed investigation and decision-making;
- provide robust support for targets of bullying and educate those who bully to change their behaviour;
- meet safeguarding and regulatory duties, including Independent School Standards;
- support leaders to monitor patterns, evaluate impact and continuously improve practice.

Bullying is always unacceptable. The school will take action even when behaviour occurs outside the school site if it impacts pupils' safety or wellbeing or disrupts the orderly running of the school.

2. Scope and definitions (bullying vs conflict vs safeguarding)

2.1 Scope

This policy covers bullying:

- between pupils (including child-on-child abuse where thresholds are met);
- by pupils towards staff and by staff towards pupils (handled under Staff Code of Conduct and safeguarding/HR procedures);
- by adults on site (handled under safeguarding and complaints procedures);
on school transport, during off-site visits, in the community, and online, where it affects pupils or the school.

Bullying incidents are managed in conjunction with IW's Safeguarding, Behaviour and Relationships, Online Safety, Attendance, and SEND policies.

2.2 Definitions

Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally, often involving an imbalance of power (real or perceived). Bullying can take place face-to-face and online.

Peer conflict is a disagreement or falling-out between pupils of similar power that is occasional, can be resolved, and does not involve deliberate, repeated harm.

Child-on-child abuse refers to certain harmful behaviours between children that may constitute safeguarding concerns (for example, sexual harassment/violence, serious physical assault, coercive control, criminal exploitation, sexting, initiation/hazing). Where concerns indicate abuse, IW follows safeguarding procedures and may refer to children’s social care and/or the police.

2.3 Quick guide: bullying vs conflict vs safeguarding concern

Feature	Peer conflict	Bullying	Safeguarding / child-on-child abuse
Pattern	Isolated/occasional	Repeated or likely to be repeated	May be a single incident if serious
Power balance	Similar power	Power imbalance (size, status, vulnerability, group vs individual)	May involve coercion, threats, exploitation
Intent	Not intended to harm (often misunderstood)	Deliberate/targeted harm or humiliation	Harm/abuse; may be criminal
Response	Teaching, mediation, restorative support	Structured investigation + safety plan + sanctions/education	Safeguarding procedures; DSL leads; possible referral

3. Statutory context and alignment (Ofsted, ISS, KCSIE, Equality Act, SEND)

IW’s approach aligns with:

- DfE advice on preventing and tackling bullying;
- Keeping Children Safe in Education (KCSIE) – current edition;
- Working Together to Safeguard Children – current edition;
- Equality Act 2010 (including the Public Sector Equality Duty and reasonable adjustments);
- Children and Families Act 2014 and SEND Code of Practice;
- Education (Independent School Standards) Regulations 2014 (Independent School Standards);
- Ofsted Education Inspection Framework (EIF) and Independent Schools Inspection Handbooks (non-association / association).

In practice, this means we maintain: an effective safeguarding culture and reporting; clear behaviour expectations; a consistent and fair response to incidents; an inclusive curriculum and personal development; and strong leadership oversight with evidence of impact.

3.1 Ofsted focus areas

Inspectors consider whether pupils are safe and feel safe; whether staff identify and respond effectively to bullying and discrimination; and whether leaders evaluate information and take timely action. Evidence includes records, pupil voice, parent feedback, supervision arrangements, curriculum design, and case reviews that demonstrate learning and improvement.

3.2 Independent School Standards (ISS)

This policy supports compliance with ISS requirements relating to the welfare, health, and safety of pupils, the promotion of good behaviour, and the prevention of bullying. The school ensures that it has published policies, clear procedures, and consistent implementation, as evidenced by records and monitoring.

3.3 EQUALS and SEND curriculum principles

IW's curriculum design draws on EQUALS to ensure that personal development, communication, relationships and wellbeing are explicitly taught and rehearsed across pathways. Anti-bullying work is embedded in structured routines, social-communication teaching, emotional literacy, and opportunities for safe participation and belonging.

4. Culture and a preventative whole-school approach

4.1 Therapeutic, trauma-informed, communication-first

IW is a therapeutic, trauma-informed setting. We understand behaviour as communication and prioritise safety, regulation and relationship. Pupils who have experienced adversity may perceive threat quickly; bullying prevention, therefore, includes predictable routines, calm adults, and consistent boundaries.

Communication-first practice means pupils have access to supportive communication systems (visuals, symbols, AAC, social stories, talking mats), and that adults use clear, concrete language, processing time, and reassurance.

4.2 Prevention in everyday practice

- High-quality relationships: consistent key adults; greeting routines; daily check-ins and check-outs.
- Active supervision: adults positioned to observe; structured play; clear transition routines.
- Environment design: calm zones, choice boards, clear signage; safe spaces as proactive supports.
- Curriculum: PSHE/RSHE, online safety, disability awareness, empathy and bystander skills taught explicitly and revisited.
- Positive reinforcement: noticing and celebrating kindness, inclusion and repair.
- Pupil voice: accessible ways for pupils to express safety/worry and influence improvements.

4.3 Anti-bullying ambassadors and pupil leadership (SEND-appropriate)

Where appropriate, IW develops pupil leadership roles such as 'Kindness Champions' or 'Anti-bullying Ambassadors'. These roles are carefully selected and supported, ensuring pupils are safe and the role is meaningful for their developmental level. Ambassadors help promote kindness campaigns, create posters using symbols, and support peer inclusion under adult guidance.

5. Roles and responsibilities

5.1 Proprietor / Governing body

- Ensure robust policies and effective implementation to meet statutory duties and Independent School Standards.
- Receive termly safeguarding and behaviour reports including bullying data, patterns, actions and outcomes.
- Ensure suitable staffing, training, supervision and resources are in place.
- Provide appropriate challenge and support, including scrutiny of serious incidents and learning reviews.

5.2 Headteacher / SLT

- Lead the school culture and model respectful relationships.

- Ensure the policy is implemented consistently across all contexts.
- Oversee serious incidents, recurring patterns and high-risk cases.
- Ensure parents/carers are communicated with appropriately and supported.
- Ensure curriculum and staff training reflect identified needs and patterns.

5.3 DSL / Deputy DSLs

- Triage incidents for safeguarding thresholds and decide on referrals/strategy discussions.
- Ensure high-quality recording on the school system (e.g., CPOMS) and secure storage of evidence.
- Coordinate multi-agency working and safety planning for vulnerable pupils.
- Quality assure investigations and ensure consistent responses.

5.4 SENCo / Therapeutic team

- Advise on reasonable adjustments, communication supports and sensory adaptations.
- Support development of individual plans (safety plans, social communication plans, regulation plans).
- Deliver targeted interventions and evaluate impact.

5.5 All staff and volunteers

- Model respectful, inclusive language; challenge derogatory comments immediately.
- Respond to and record concerns promptly, following the reporting routes in this policy.
- Maintain active supervision and follow the pupil's individual plans.
- Maintain professional boundaries and report concerns about adult conduct via safeguarding/whistleblowing routes.

5.6 Parents/carers

- Share concerns early and work collaboratively with the school to implement plans.
- Support consistent messages at home (including online behaviour).
- Help the school by not encouraging retaliation and by preserving evidence where online bullying occurs.

5.7 Pupils

Pupils are supported to understand what bullying is, how to ask for help, and how to treat others with respect. Expectations are taught explicitly and revisited regularly. Pupils are encouraged to be 'upstanders' (seek adult help) rather than 'bystanders'.

6. Recognising bullying

Bullying may be reported directly or may be noticed through changes in behaviour, emotional presentation or engagement. Staff must remain vigilant, particularly for pupils who have difficulty communicating distress.

Possible indicators include: increased anxiety, withdrawal, school refusal, unexplained injuries, damaged belongings, sleep disturbance, self-harm indicators, changes in eating, sudden aggression, regression in skills, heightened sensory distress, or avoidance of particular pupils/areas.

6.1 SEND presentation

For some pupils, bullying may present as:

- increased shutdown, mutism, or refusal;
- heightened sensory overload in communal spaces;
- spikes in self-injury or dysregulation;
- increased scripting or repetitive questioning about safety;

- somatic complaints (stomach aches, headaches);
- changes in toileting or personal care routines.

Because some pupils may not describe bullying in conventional ways, staff should use communication supports and gather information through observation, routine analysis and trusted relationships.

7. Types of bullying and prejudice-based bullying

7.1 Common types

Type	Examples (non-exhaustive)	SEND considerations
Physical	hitting, kicking, pushing, damaging property, blocking movement	Risk increases for pupils with mobility needs; consider supervision and safe routes
Verbal	name-calling, threats, taunts, mocking disability, accent or family	may exploit literal understanding; teach 'reporting' vs 'tattling'
Emotional/relational	exclusion, rumours, manipulating friendships, intimidation, and silent treatment	Pupils with autism may find exclusion particularly distressing; provide structured inclusion
Prejudice-based	racist, disablist, sexist, homophobic/transphobic language; targeting protected characteristics	record as a hate incident where appropriate; curriculum response required
Cyber	harassment via messages, images, social media, gaming platforms; impersonation	pupils may be overly trusting online; teach privacy and reporting; preserve evidence
Coercive / exploitation	forcing someone to do things; taking possessions; threats to share images	may indicate safeguarding concerns; DSL must triage

7.2 Prejudice-based bullying and protected characteristics

IW will not tolerate prejudice-based bullying. Any incident is treated as serious, recorded explicitly, and used to drive education and improvement. Where appropriate, incidents may be reported as hate incidents and escalated via safeguarding procedures.

Protected characteristics include disability, race, religion or belief, sex, sexual orientation, gender reassignment, and others. IW's approach is rooted in equality, dignity and inclusion.

8. Reporting routes, recording and initial response

8.1 Accessible reporting for pupils

- Tell any adult (teacher, TA, therapist, lunchtime staff).
- Use a 'worry card' or symbol to request help.
- Use AAC or an agreed phrase/script.
- Use a worry box (paper or symbol).
- Ask a trusted adult to support them to report (key worker).

8.2 Staff actions on disclosure or observation

All staff must:

- 1) Take the concern seriously and respond calmly.
- 2) Ensure immediate safety (separate pupils if needed);
- 3) Listen and reassure, using appropriate communication supports;
- 4) Avoid promising confidentiality;
- 5) Record and report according to the timelines below.

8.3 Recording and timescales

What	Who	Timescale
Immediate safety response and a brief note of what happened	Any staff member	Immediately
Log concern on the recording system (facts, pupil voice, actions taken)	Staff member who received concern	Same day (before leaving, where possible)
Inform DSL/SLT if risk/seriousness indicates	Any staff member	Immediately for high-risk; otherwise within 24 hours
Initial triage and risk assessment	DSL/SLT	Within 1 working day
Parent/carer contact (unless this increases risk)	SLT/DSL	As soon as practicable, generally within 1 working day after triage

9. Investigation process (SEND-adjusted) and decision-making

Investigations are proportionate, child-centred and SEND-informed. We avoid re-traumatisation by planning conversations carefully, using familiar adults where appropriate, and ensuring pupils are regulated.

Typical steps include:

- triage and safeguarding threshold decision;
- gathering pupil accounts separately (supported by visuals/AAC);
- reviewing supervision notes, seating plans, CCTV (if available), transport logs and online evidence;
- checking for patterns and power imbalance;
- deciding whether the behaviour meets the definition of bullying, conflict or safeguarding concern;
- agreeing on actions, support plans, and review dates.

Where a pupil's needs affect their understanding or behaviour, we consider this as part of our analysis. However, SEND does not excuse harmful behaviour; it informs our response and the teaching/support needed.

9.1 Interviewing and pupil voice (SEND)

- Use the pupil's communication profile; allow processing time and breaks.
- Use visuals (who/what/where/when), social stories and emotion scales to support recall.
- Prefer open prompts; avoid leading questions.
- Record the pupil's voice in the format it is given (symbols, drawings, AAC output).
- Where necessary, seek input from speech and language therapy (SaLT) to support communication.

9.2 Evidence and confidentiality

Information is shared on a need-to-know basis. We do not share details that would compromise another pupil's confidentiality. However, we will share the actions taken and the support plan for the child concerned.

10. Support for the target (safety, wellbeing, access to learning)

Support is tailored to the pupil's needs and may include:

- a named trusted adult and planned check-ins/check-outs;
- individual safety and wellbeing plan (routes, supervision, seating, groupings);
- therapeutic input: ELSA-informed work, counselling, play therapy, SaLT/OT support as appropriate;
- support with self-advocacy scripts and help-seeking;
- restoring access to learning and attendance through predictable routines and reassurance;
- parent partnership and home strategies.

10.1 Safety and risk assessment

For severe or persistent bullying, the DSL/SENCo may complete a risk assessment and agree on additional controls (e.g., increased supervision, staggered transitions, time-limited separation, safe spaces, staff deployment). Plans are reviewed regularly.

11. Action and education for those who bully

While protecting the target is the priority, we also work with the pupil who has bullied to stop harm and build safer behaviours. Responses are graduated and take into account intent, impact, pattern, and pupil needs.

11.1 Graduated response

Level	Example indicators	Likely actions
1 – Low-level unkind behaviour /emerging pattern	isolated unkind comment; misunderstanding; minor exclusion	immediate correction; teaching; restorative conversation; monitor
2 – Bullying behaviour	repeated teasing; targeted mocking; power imbalance forming	investigation; parent contact; safety plan; behaviour plan; targeted intervention; sanctions as appropriate
3 – Serious/discriminatory/high-risk	threats, coercion, hate language, physical harm; significant distress; exploitation indicators	DSL leads; safeguarding consideration; external referrals where needed; intensive plan; possible suspension/exclusion in line with Behaviour Policy

11.2 Restorative practice (SEND-adapted)

Restorative work is used where it is safe and appropriate. It is never used to pressure a pupil into reconciliation or apology. The target's views, wellbeing and safety come first.

Restorative questions (adapted with visuals/sentence starters):

- What happened?
- What were you thinking/feeling at the time?
- Who has been affected and how?
- What do you need now to feel safe?

- What needs to happen to put things right?
- How will we make sure this does not happen again?

11.3 Sanctions and exclusions

Sanctions are used proportionately, in line with the Behaviour and Relationships Policy and Independent School Standards. In severe or persistent cases, internal consequences, suspension or permanent exclusion may be considered. Any decision is informed by risk assessment, safeguarding considerations, and the duty to make reasonable adjustments for people with disabilities.

12. Cyberbullying and online safety

Cyberbullying includes harassment, humiliation, threats or exclusion using digital technology (social media, messaging, gaming, email, sharing images). It can be persistent and occur beyond the school day.

IW prevents cyberbullying through:

- online safety education across the curriculum, adapted for SEND;
- clear acceptable use expectations for devices;
- teaching reporting routes and how to block/report content;
- parent guidance and workshops on supervision and privacy settings;
- staff training on evidence preservation and safeguarding thresholds (including sexual harassment/violence online).

12.1 Responding to online incidents

- Preserve evidence (screenshots/URLs) where safe; do not ask pupils to delete evidence immediately.
- Support the child to block/report; involve parents/carers.
- DSL triage: consider safeguarding thresholds (threats, sexual content, exploitation, hate incidents).
- Apply school sanctions and education, and consider external reporting where appropriate.

13. Bullying off-site, transport and community

IW will act where bullying occurs off-site (including transport, community, online) and affects pupils' wellbeing or school life. Actions may include liaising with transport providers, community partners, parents/carers, and, where necessary, the police or safeguarding agencies.

14. Monitoring, evaluation and governance oversight

Leaders monitor incidents to identify patterns and hotspots (location, time, group, type, protected characteristics, SEND profiles). We use data alongside pupil voice, parent feedback and staff reflections to improve practice.

Quality assurance includes: case audits; supervision and deployment reviews; curriculum evaluations; and reviews of the effectiveness of safety plans.

14.1 What we report and review

- number and type of incidents, including prejudice-based incidents;
- time and location hotspots;
- repeat incidents involving the same pupils;
- effectiveness of interventions and time to resolution;

- attendance and wellbeing indicators for pupils involved;
- lessons learned and actions taken.

15. Working with families and external agencies

Families are key partners. We communicate sensitively and promptly, recognising the emotional impact bullying can have.

We may involve external agencies where appropriate, including: Educational Psychology, CAMHS, SaLT/OT, Virtual School, children’s social care, police, local authority inclusion teams, online safety partners, or specialist support services.

Where parental conflict exists or communication may increase risk, the DSL will plan contact carefully and seek advice.

16. Staff training, induction and supervision

- Induction: all staff receive training on safeguarding, behaviour, anti-bullying procedures, and recording systems.
- Annual update: bullying, prejudice-based bullying, child-on-child abuse and online safety.
- Regular refreshers: scenario-based practice; supervision skills for unstructured times; de-escalation and relational practice.
- Supervision/debrief: reflective practice for staff supporting complex cases, maintaining calm and consistent responses.

17. Review and version control

This policy is reviewed at least annually, and earlier if required by changes to legislation/statutory guidance, significant incidents, or lessons learned from safeguarding reviews. Changes are communicated to staff and, where appropriate, to pupils and parents/carers.

Version control record:

Version	Date	Summary of changes	Approved by
v1	2026-01-29	Initial IW policy issued.	Proprietor / SLT

Appendices

Appendix A – Key linked policies and documents

- Child Protection and Safeguarding Policy
- Behaviour and Relationships Policy
- Online Safety Policy and Acceptable Use Agreements
- RSHE/PSHE Policy and Curriculum
- SEND Policy and Information Report
- Complaints Policy
- Staff Code of Conduct / Whistleblowing Policy
- Attendance Policy

Appendix B – Official guidance and frameworks (reference list)

Schools should refer to the most up-to-date versions of these documents. Examples include:

- Preventing and Tackling Bullying (DfE advice)
- Keeping Children Safe in Education (KCSIE)
- Working Together to Safeguard Children
- Equality Act 2010 guidance
- Independent School Standards (2014) and guidance
- Ofsted Education Inspection Framework / Independent Schools Inspection Handbook

Appendix C – Bullying reporting flowchart (text version)

- 1) STOP the behaviour; separate pupils if needed.
- 2) SUPPORT the pupil who has been targeted (reassure, regulate, ensure safety).
- 3) RECORD facts and pupil voice (same day).
- 4) REPORT to DSL/SLT (immediate if serious/high-risk).
- 5) DSL/SLT TRIAGE: bullying/conflict/safeguarding.
- 6) INVESTIGATE proportionately and agree on a plan.
- 7) INFORM parents/carers and agree on a review date.
- 8) REVIEW and monitor until resolved; log outcome.

Appendix D – Bullying incident record template (copy/paste fields)

Date/time/location:

Pupil(s) involved:

Staff reporting:

Type of bullying (tick): physical / verbal / emotional / cyber / prejudice-based / other

Description (facts):

Pupil voice (how recorded – words/symbols/AAC/drawing):

Immediate actions taken:

Safeguarding triage decision (DSL):

Parents contacted (date/time):

Support plan for target:

Actions for the pupil who bullied:

Review date and outcome:

Appendix E – Safety and Wellbeing Plan (example headings)

Risk/hotspots:

Protective factors:

Named trusted adults:

Supervision arrangements:

Safe routes/places:

Communication supports for reporting:

Curriculum/skills targets:

Parent/carer actions:

Review schedule:

Appendix F – Pupil-friendly information (SEND-adapted)

This appendix should be produced in symbol-supported formats and social stories for different pathways. Core messages:

- Bullying is not your fault.
- Tell an adult you trust.
- You can use a help card / your talker / a picture.
- Keep telling until you feel safe.
- We will help.

Appendix G – Parent/carer guide (summary)

- What bullying is and how to spot signs
- How to report concerns
- What the school will do (timescales and updates)
- How parents can support at home (including online)
- Who to contact and how to escalate concerns

Supplementary sections (IW enhanced practice)

S1. Supervision, environmental risk reduction and 'hotspot' management

Because IW serves pupils who may be vulnerable to exploitation, misunderstanding and rapid escalation, supervision is not passive. All adults on duty are expected to scan, be strategically positioned, and intervene actively and early.

Leaders maintain a 'hotspot map' of the site. This is updated termly using incident data and staff/pupil feedback. Hotspots commonly include corridors, toilets, cloakrooms, playground edges, sensory areas, arrival/departure points and transport handover.

Control measures may include: increased staffing ratios; staggered transitions; one-way systems; visual reminders; structured zones; supervised toilet routines (privacy-respecting); and planned activities during unstructured times.

- Active supervision: adults move, scan, and interact; they do not cluster together or use phones except for safeguarding/medical purposes.
- Transition protocols: pupils are met and moved with clear, predictable routines; vulnerable pupils have identified adults.
- Play plans: structured choices, adult-facilitated games, and clear 'how to join in' prompts reduce exclusion and conflict.
- Toilets and personal care: supervised access is planned via individual risk assessments, balancing dignity and safety.
- Sensory/regulation spaces: used proactively and monitored; adults ensure these spaces are not used to isolate or target peers.

S2. SEND-informed communication and interviewing toolkit

When staff need to gather information from pupils, they must adapt communication so pupils can share their experiences safely and accurately. Where a pupil uses AAC or has significant processing needs, staff should plan the conversation in advance and, where helpful, seek SaLT advice.

Good practice includes:

- Choose a calm setting and a familiar, trusted adult, unless this compromises impartiality or safety.
- Use short sentences, concrete language, and one question at a time.
- Offer visual choices for 'where', 'who', 'what happened', and 'how did it make you feel'.
- Allow processing time; offer breaks; avoid repeating questions in ways that suggest a 'right answer'.
- Record the pupil's words exactly; if the pupil uses symbols/drawings, keep a copy (photograph and attach to the record).
- Check understanding by summarising neutrally and asking the pupil to confirm (with yes/no visuals if needed).

Where pupils have experienced trauma, staff avoid confrontational questioning and ensure the pupil is regulated before continuing. Staff should be alert to the possibility that pupils may 'mask' distress, agree to please adults, or be fearful of consequences.

S3. Bystander skills, peer support and teaching 'upstanding'

IW explicitly teaches pupils (at developmentally appropriate levels) how to respond when they see bullying. We avoid placing responsibility on pupils to 'sort it out' themselves; instead, we teach safe help-seeking.

Key messages:

- If you feel unsafe: get an adult.

- If you see someone being hurt: get an adult.
- Don't join in. Don't laugh. Don't share online.
- Use your help card/talker/picture to show you need help.

For some pupils, peer support (buddying) can enhance safety and a sense of belonging. Buddy systems are planned, supervised and risk-assessed, with clear expectations and boundaries so that pupils are not over-burdened and safeguarding risks are managed.

S4. Curriculum mapping for anti-bullying (EQUALS-aligned)

Anti-bullying education is not confined to a single week. IW maps key learning across the year, revisiting and deepening concepts through repetition and rehearsal. This mapping aligns to EQUALS-informed strands such as Communication, Independence, PSHE, and Preparation for Adulthood (where applicable), as well as RSHE outcomes.

Examples of progression:

- Recognising feelings and body signals (unsafe/safe).
- Naming behaviour: kind/unkind/bullying; recognising teasing vs harm.
- Practising assertive scripts and help-seeking routines.
- Friendship skills: turn-taking, joining in, managing 'no', repairing relationships.
- Understanding difference and disability; challenging stereotypes; celebrating identity and culture.
- Online safety: privacy, consent, reporting, respectful digital communication.
- Understanding boundaries and consent (age-appropriate) to prevent peer-on-peer harm.

Term focus	Primary teaching themes (examples)	SEND-adaptations (examples)
Autumn	Belonging; classroom rules; friendship routines; 'what to do if worried'	symbol rules, social stories, role-play, video modelling
Spring	Respecting differences, empathy, prejudice-based bullying, and upstander skills	Talking Mats, comic-strip conversations, sensory-friendly discussions
Summer	Online safety and digital citizenship; transition safety; community/transport routines	device-specific visuals, rehearsal of reporting steps, transition booklets

S5. Evidence for inspection and assurance (Ofsted/ISS)

IW maintains clear evidence that bullying is prevented and addressed effectively. Leaders triangulate:

- case records showing timely action, pupil voice and review outcomes;
- staff training logs and induction records;
- supervision rotas and duty plans demonstrating active supervision;
- curriculum plans and lesson evidence (PSHE/RSHE/online safety) adapted for SEND;
- pupil voice evidence (symbol surveys, Talking Mats outcomes, school council notes);
- parent feedback and complaint resolution records;
- termly reports to proprietors/governance with actions and impact.

Leaders undertake periodic 'deep dives' into behaviour and safety, reviewing hotspots, support plans and consistency across teams. Learning is captured and translated into practical changes (staffing, environment, curriculum, training).

S6. Templates and practical tools (expanded)

The appendices provide templates to support consistent practice. IW uses these tools to ensure that recording, planning and review are robust and consistent.

Templates include:

- incident recording form and classification guide;
- individual safety and wellbeing plan;
- restorative meeting script and sentence starters;
- behaviour support contract;
- parent/carer communication templates;
- bullying risk assessment template for vulnerable pupils;
- hotspot mapping and supervision review checklist.

Additional appendices (expanded templates)

Appendix H – Bullying classification guide

Category	Code	Examples
Peer conflict	C	single disagreement, equal power, both upset, resolved with mediation
Bullying – verbal/relational	B1	Repeated teasing, mocking disability, and exclusion patterns
Bullying – physical	B2	Repeated pushing/hitting, intimidation, and damage to belongings
Bullying – cyber	B3	messages/online posts intended to upset, repeated contact, group chats
Prejudice-based / hate incident	B4	racist/disablist/homophobic/transphobic language; targeting protected characteristics
Safeguarding / child-on-child abuse	S	sexual harassment/violence; serious assault; coercion; exploitation

Appendix I – Restorative meeting script (SEND-adapted)

Preparation

- Confirm it is safe and appropriate.
- Gain consent (both parties).
- Ensure each pupil is regulated; use breaks; agree a 'stop signal'.
- Use visuals/sentence starters.

Facilitated questions

1. What happened? (use sequence cards)
2. What were you thinking/feeling? (feelings chart)
3. Who has been affected? (people cards)
4. What do you need to feel safe now? (choice board)
5. What will you do next time? (script/rehearsal)

Agreement

Write/draw the agreement using visuals. Set a review date and identify which adult will monitor.

Appendix J – Behaviour support contract (example headings)

Pupil name:

Goal behaviour (what we want to see):

Unacceptable behaviour (what must stop):

Triggers/early signs:

Support strategies and reasonable adjustments:

Adult prompts/scripts:

Rewards/positive reinforcement:

Consequences if behaviour occurs:

Review date:

Signatures (pupil/adult/parent as appropriate):

Appendix K – Parent/carer communication templates (example text prompts)

Initial contact (phone/email) – information gathering and reassurance

- Thank you for raising this.
- We are taking it seriously and will look into it.
- We will put immediate safety measures in place.
- We will update you by [date/time].

Outcome update (summary)

- We have investigated and found [summary without breaching confidentiality].
- Actions we are taking to keep your child safe:
- Support for your child:
- Review date and how to contact us:

Appendix L – Bullying risk assessment template (vulnerable pupils)

Identify pupil vulnerabilities (communication, sensory, social understanding, mobility, trauma history):

Known triggers/hotspots:

Potential harms:

Likelihood/severity rating:

Controls (supervision, environment, routines, peer groupings, transport):

Communication supports for reporting:

Review date and responsible lead:

Further SEND-specific guidance and safeguarding integration

F1. When bullying links to EBSA, attendance and mental health

Bullying can contribute to Emotionally Based School Avoidance (EBSA), reduced engagement and deterioration in mental health. In IW, shifts in attendance, punctuality, 'hidden' avoidance (late arrival, frequent time out of class) or escalation in distress behaviours may indicate that a pupil feels unsafe.

Where EBSA indicators are present, the class team, SENCo and DSL will consider bullying as a potential contributing factor and ensure:

- the pupil has an updated safety and wellbeing plan with clear protective arrangements;
- the pupil voice is gathered in an accessible way (including Talking Mats/AAC);
- parents/carers are engaged promptly, and support strategies are agreed;
- attendance plans are trauma-informed and avoid punitive responses to anxiety;
- Therapeutic support is offered and reviewed for impact.

Leaders will review whether any environmental or supervision changes are needed to reduce perceived threat. Any bullying that appears linked to EBSA is treated as high priority.

F2. Reasonable adjustments: practical examples for bullying prevention and response

As an independent SEND school, IW routinely makes reasonable adjustments so pupils can access safety and justice. Adjustments are individualised and documented where needed.

Examples include:

- symbol-supported rules and 'what is bullying?' social stories;
- pre-taught scripts and rehearsal for reporting, saying 'stop', and seeking help;
- staggered transitions or escorted routes for vulnerable pupils;
- structured peer groupings and supported play to prevent exclusion;
- quiet lunch/structured lunchtime provision;
- safe seating plans and adult proximity for pupils targeted in class;
- visual boundary markers in shared spaces;
- supervised 'cool down' routines to prevent a pupil from being isolated and targeted;
- SaLT support to ensure questions are accessible and pupil voice is captured accurately.

Adjustments are reviewed and reduced only when the pupil's safety and confidence have demonstrably improved.

F3. Bullying by adults, bullying of staff, and professional conduct

IW is committed to respectful, professional relationships between adults and children. Any behaviour by an adult that humiliates, intimidates, coerces or targets a pupil is unacceptable and may constitute a safeguarding concern.

Bullying by adults towards pupils is addressed through safeguarding and HR procedures and may result in referral to external agencies where required.

Bullying of staff by pupils or adults is also unacceptable. IW supports staff wellbeing and will take appropriate action, including behaviour planning with pupils and, where adult-to-adult bullying/harassment is alleged, following HR, grievance or complaints routes.

- Staff must follow the Staff Code of Conduct and maintain professional boundaries.

- Derogatory language, ‘banter’ that targets identity or needs, and public shaming are not acceptable.
- Concerns about adult conduct are reported to the Headteacher and/or DSL (or proprietor if the concern is about the Headteacher).
- Whistleblowing routes are available and promoted.

F4. Information sharing, confidentiality and data protection

Recording and information sharing must balance confidentiality with safeguarding duties. IW records bullying incidents and related safeguarding information in line with data protection principles and school retention schedules.

Parents/carers will be informed of concerns about their child, the actions being taken, and support plans. However, IW will not share personal data about other pupils. We will share as much as we can about the steps taken to ensure safety and prevent recurrence.

Where a safeguarding threshold is met, IW may share information with statutory agencies without consent where lawful and necessary to protect a child.

F5. Scenario prompts for staff (consistent thresholds)

To support consistent decision-making, staff should consider these examples (not exhaustive):

Scenario	Likely category	Key actions
A pupil repeatedly calls another pupil ‘stupid’ and hides their belongings; the target becomes anxious and avoids playtime	Bullying (verbal/relational)	Record, SLT triage, safety plan, parental contact, intervention, and monitoring
A pupil sends threatening messages and shares an embarrassing photo in a group chat	Cyberbullying: potential safeguarding	Preserve evidence; DSL triage; parent contact; possible referral depending on threat content
Repeated disablist slurs targeting a pupil’s disability; peers join in	Prejudice-based bullying/hate incident	Immediate challenge: record as prejudice-based; DSL oversight; curriculum response; consider external reporting
A pupil coerces another pupil to hand over money/food daily with threats	Safeguarding concern (coercion/exploitation)	DSL leads; risk assessment; possible referral; multi-agency
A one-off argument where both pupils are upset and apologise with support	Peer conflict	Restorative support; teach repair; monitor

Appendix M – Staff checklist (daily practice)

- I greet and notice pupils; I know who is vulnerable today and what support they need.
- I supervise actively and intervene early; I don’t dismiss ‘small’ incidents.
- I challenge derogatory language immediately and explain why it is unacceptable.
- I help pupils report worries using their communication system.
- I record facts and pupil voice the same day and escalate appropriately.
- I follow safety plans, seating plans and supervision arrangements consistently.
- I reflect and seek support when incidents are complex or emotionally demanding.

Further quality assurance and implementation detail

Q1. Monitoring schedule (what we do, when, and how we act on it)

To ensure this policy works in day-to-day practice, IW uses a structured monitoring cycle. The purpose is not simply to count incidents but to understand patterns, reduce risk and improve pupils' lived experience of safety.

Daily

- staff log concerns promptly; DSL/SLT review any high-risk issues and ensure immediate safety controls.
- duty staff share quick 'end of day' reflections (hotspots, emerging issues).

Weekly

- SLT/DSL review incident data and supervision notes; identify any repeated names, locations or times.
- class teams update individual safety/wellbeing plans where needed.

Half-termly

- leaders complete a bullying and behaviour audit: patterns by type, protected characteristics, SEND needs, and context.
- pupil voice is gathered in accessible formats (Talking Mats, symbol surveys, small group conversations).
- curriculum leaders review PSHE/RSHE and online safety coverage and adapt planning in response to themes.

Termly

- report to proprietor/governance: incident analysis, actions taken, training delivered, and evidence of impact.
- environment 'hotspot map' updated and duty rota adjusted accordingly.

Annually

- policy review, including stakeholder feedback and learning from serious incidents.
- full staff training update and refresh of resources.

Q2. Anti-Bullying Week and ongoing campaigns (SEND-adapted)

IW participates in Anti-Bullying Week and uses it as a launch point for sustained work. Activities are adapted to be accessible, low-arousal and meaningful for SEND pupils.

Examples include:

- short daily assemblies with symbols/photos on kindness, respect and help-seeking;
- class-based stories with role-play using puppets, comic-strip conversations and video modelling;
- 'kindness missions' with clear, achievable tasks (e.g., invite someone to play, share a resource, give a compliment);
- creation of class 'friendship toolkits' (help cards, scripts, feelings charts);
- parent/carers newsletter with practical advice on reporting, online safety and supporting anxious children;
- staff focus: supervision, micro-training, and reflective practice on early intervention.

Campaigns run throughout the year, not just in one week. IW uses consistent language and visuals so pupils can recognise messages across settings.

Q3. Resource bank (recommended materials and how we use them)

IW maintains a curated, SEND-appropriate resource bank. Materials are selected for accessibility (clear language, visuals, predictable structure) and for trauma-informed delivery.

Examples include:

- Anti-Bullying Alliance resources, including SEND-focused tools and templates.

- NSPCC guidance for children and parents on bullying and online safety.
- UK Safer Internet Centre resources and reporting routes.
- Childline resources for help-seeking and emotional support.
- EQUALS-aligned PSHE resources and symbol-supported lesson materials.
- School-created social stories tailored to the IW environment (e.g., 'What to do at playtime', 'How to ask for help', 'What to do if someone is unkind online').

Staff are trained to select resources appropriate to each pupil's developmental level and communication profile. The SENCo/therapeutic team supports adaptation (e.g., symbols, simplified text, audio versions, multisensory delivery).