ANTI-BULLYING POLICY
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In accordance with the Education (Independent School Standards) Regulations 2014, the School has due regard to "Preventing and Tackling Bullying" and is responsible for implementing an effective anti-bullying strategy.

At Wychwood, our community is based upon respect, good manners and consideration for others. We are committed to providing a safe and caring environment that is free from bullying so that every one of our pupils can develop her 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, safe, disciplined environment. All pupils should care for and support each other. Wychwood School, Oxford, prides itself on its respect and mutual tolerance. Parents/guardians have an important role in supporting Wychwood School, Oxford, in maintaining high standards of behaviour. It is essential that school and homes have consistent expectations of behaviour and that they co-operate closely together.

In accordance with the Equality Act 2010 and the Public Sector Equality Duty (April 2011) the School has due regard to the need to:
•   Eliminate unlawful discrimination, 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; and
•   Foster good relations between people who share a protected characteristic and people who do not share it.

In addition to the duties in relation to pupils with specific disabilities under the Equality Act, we also have a duty under Part 3 of the Children and Families Act 2014 to ensure that pupils with special educational needs engage in the activities of the School together with children who do not have special educational needs.

Bullying, harassment, intimidation, victimisation and discrimination will not be tolerated. We treat all our pupils and their parents fairly and with consideration and we expect them to reciprocate towards each other, the staff and the school. Any kind of bullying is unacceptable. We do not underestimate the serious psychological damage caused by bullying, which – at its most devastating – can even lead to suicide.

This policy is provided to all parents and prospective parents as well as to staff, including junior and recently appointed staff. As a school with boarders we are particularly conscious that all boarders, especially those for whom English is not their first language, should understand the policy.

Criminal law

Although bullying in itself is not a specific criminal offence in the UK, it is important to bear in mind that some types of harassing or threatening behaviour – or communications – could be a criminal offence, for example under the Protection from Harassment Act 1997, the Malicious Communications Act 1988, the Communications Act 2003, and the Public Order Act 1986.   If school staff feel that an offence may have been committed they should seek assistance from the police.

Principles
- The School does not tolerate any behaviour whether physical, verbal or otherwise which threatens or demeans the self-esteem and welfare of any member of the school community. This includes "initiation ceremonies" or any other action intended to cause pain, humiliation or anxiety.
- The School is committed to the health and safety of the whole community and will take action to safeguard all individuals' well-being.
- The School acknowledges the importance of its pastoral role in the welfare of its pupils, and will seek to persuade anyone in need of support to come forward.
- The School believes that every pupil has the right to be safe and happy in school, and to be protected when she is feeling vulnerable.

Aims
- To prevent, as far as is possible, bullying taking place.
- To create an atmosphere where those who are being bullied or others who know about it, feel that they will be listened to and believed, and that action taken will be swift but sensitive to their concerns.
- To respond effectively and appropriately to particular incidents.
- To keep open all lines of communication, including with parents.

Objectives
- To provide teaching about standards of behaviour acceptable to responsible members of society.
- To encourage the "bully" to take responsibility for her words and actions and to understand that her behaviour is unacceptable and has caused distress.
- To share the burden of the problem with the "victim" and to promote her self-esteem.

DATA PROTECTION
Confidentiality will be upheld in line with the General Data Protection Regulation (GDPR) and Data Protection Act 2018, the Data Protection Act 1998, the Human Rights Act 2002 and the Freedom of Information Act.

Definition of bullying
Bullying is behaviour by an individual or group, **repeated over time**, that intentionally hurts, harms or humiliates another individual or group either physically (including sexually),

verbally (including cyber i.e. abuse through emails and text messages, social media, gaming, the use of images and video) or emotionally (by excluding, tormenting or spreading malicious rumours). It can involve manipulating a third party to tease or torment someone. It can also involve complicity that falls short of direct participation. Bullying is often hidden and subtle. It can also be overt and intimidatory.

Low-level disruption and the use of offensive language can in itself have a significant impact on our pupils. If left unchallenged or dismissed as banter or horseplay it can also lead to reluctance to report other behaviour. Early intervention can help to set clear expectations of the behaviour that is and is not acceptable here at Wychwood and help stop negative behaviours escalating.

Bullying can take many forms and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, gender reassignment, sexual orientation, special educational needs or disabilities or because a child is adopted, in care or has caring responsibilities. It might be motivated by actual differences between children, or perceived differences.

Bullying then may involve actions or comments that are racist, religious, cultural, sexist or homophobic or which focus on special educational needs or disabilities or other physical attributes (such as hair colour or body shape) or situations such as pregnancy, maternity or gender reassignment. These may refer to the pupil or to a member of her family.

Many experts say that bullying involves an imbalance of power between perpetrator and victim, manifesting in physical, psychological or intellectual imbalance, or imbalance caused by having access to the support of a group or the capacity to socially isolate. It can result in the intimidation of a person or persons through the threat of violence or by isolating them either physically or online.

Bullying can happen anywhere and at any time. We always treat it very seriously. It conflicts sharply with the School's Policy on Equal Opportunities, as well as with its social and moral principles.

Those who bully and are bullied are often experiencing difficulties at home. Those who are bullied sometimes provoke the problem themselves.

In a girls' school cyber and verbal bullying are the greatest threats. The most likely times for these to occur are at unsupervised moments or in the evenings. Incidents can also occur on the way to or from school and at home.

A bullying incident should be treated as a child protection issue where there is "reasonable cause to suspect the child is suffering or is likely to suffer significant harm". At this point the safeguarding policy would be implemented and the issue discussed with the MASH.

Signs of bullying
Changes in behaviour that may indicate that a pupil is being bullied include:
- Unwillingness to be in school.
- Displays of excessive anxiety, becoming withdrawn or unusually quiet.
- Failure to produce work, or producing unusually bad work, or work that appears to have been copied, interfered with or spoilt by others.
- Books, bags 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 Sick Room with symptoms such as stomach pains, headaches.
- Unexplained cuts and bruises.
- Frequent absence, erratic attendance, late arrival to class.
- Choosing the company of adults.
- Displaying repressed body language and poor eye contact.
- Difficulty in sleeping, experiencing nightmares.
- Talking of suicide or running away.

Although there may be other causes for some of the above symptoms, a repetition of, or a combination of these possible signs of bullying should be investigated by parents and teachers.

Preventative measures

Preventative measures are based on raising awareness amongst staff and pupils. A copy of this policy is to be found in the Staff Shared Area, on the website and a copy is included in the New Girls' Information Pack. Everyone should therefore know what the policy is.

We take the following preventative measures:

- All staff are involved in discussion of this policy, and trained in procedures for dealing with allegations of bullying. They also explain this to the pupils.
- Over time staff will be trained in aspects of bullying that can arise when the victims have characteristics protected by the Equality Act of 2010.
- Boarding staff use the BSA written guidance to inform them on managing the needs of children with protected characteristics in a boarding setting.
- A whole-school leaflet outlining for pupils what to do in the event of suspected bullying is distributed to all pupils annually in the first form meeting of the first full week in the Michaelmas term and is discussed with the whole form. Girls who arrive in the school during the course of the year are given a copy of the leaflet, and its contents are explained to them. All pupils understand the school's approach and are clear about the part they can play to prevent bullying, including when they find themselves as bystanders.
- All our pupils are encouraged to tell a member of staff, Head Girl or other senior pupil whom they trust immediately they are aware that bullying is taking place.
- Through Assemblies, Council and form or curriculum activities we aim to explain the School Policy on Anti-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 the message about community involvement and taking care of each other.
- Other lessons, particularly RS, English and Drama highlight the issue of bullying and reinforce this message by teaching moral and spiritual values that show bullying to be unacceptable and by developing social skills and modelling behaviour.
- Outside agencies including theatre groups or the police may be engaged at regular intervals.

- Staff are always vigilant and move around the buildings at times when pupils are not in class. They are alert to inappropriate language or behaviour.
- The informal boarding environment is important in reinforcing a pupil's standards and values, providing the opportunity for friendly discussion of matters of concern to the individual pupil outside the formal classroom. We encourage close contact between the Housemistresses and parents/guardians, and would always make contact if we were worried about a pupil's well-being.
- Our boarding areas display advice on where pupils can seek help, including details of confidential help lines and web sites connecting to external specialists, such as Childline, Kidscape, Get Connected, the Ofsted helpline, Social Services, the Police and Samaritans.
- All pupils have access to the qualified School Counsellor whose contact details are widely available in the school. She also operates as our Independent Listener for the boarders.
- All pupils have access to telephone helplines, enabling them to call for support in private.
- We provide advice to our Head Girls and girl Councillors and senior boarders on the importance of offering support and assistance to younger and to vulnerable pupils.
- We welcome feedback from parents and guardians on the effectiveness of our preventative measures.

Response

If there are any instances of bullying in the school the response shall be as follows:

- To try to resolve the problem through counselling of both parties.
- We have a strong and experienced senior pastoral team (SPT) who are experienced in handling any incidents as an immediate priority, and are alert to possible signs of bullying.
- Our senior 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.
- Our trained School Counsellor is an important part of our pastoral support service, providing specialist skills of assessment and counselling. She is available to give confidential advice and counselling support to pupils who can refer themselves to her when they have social, emotional or behavioural concerns. On occasion, a member of our pastoral team may refer a pupil to her. If the situation requires it, we might refer to local authority children's services or refer to Child, Adolescent Mental Health Services (CAMHS).
- We reserve the right to investigate incidents that take place outside school hours, on the internet or internet-enabled devices and understand that teachers have the power to discipline pupils for bullying incidents outside the school premises*.
- We keep records of all instances of alleged bullying. These records will be used to help us to identify patterns.
- We inform parents what has happened and how it has been dealt with, where necessary.
- Sanctions will be applied if bullying behaviour continues; since each case is different the sanctions will differ according to the girls involved and the degree and nature of the bullying. In cases of severe and persistent bullying it may even be necessary to exclude the bully, but we would see this as a last resort. (See also the Behaviour and Discipline policy).
- Disciplinary measures will be applied fairly, consistently, and reasonably taking account of any special educational needs or disabilities that the pupils may have and taking into account the needs of vulnerable pupils or pupils with protected

characteristics under the Equality Act 2010. We believe that it is also important to consider the motivations behind bullying behaviour and whether it reveals any concerns for the safety of the perpetrator. Where this is the case the child engaging in bullying may need support themselves.

- It should be noted that corporal punishment is neither used nor threatened at Wychwood School as it is prohibited.

* School staff members have the power to discipline pupils for misbehaving outside the school premises. Sections 90 and 91 of the Education and Inspections Act 2006 say that a school's disciplinary powers can be used to address pupils' conduct when they are not on school premises and are not under the lawful control or charge of a member of school staff, but only if it would be reasonable for the School to regulate pupils' behaviour in those circumstances. This may include bullying incidents occurring anywhere off the school premises, such as on school or public transport, outside the local shops, or in a town or village centre.

Where bullying outside school is reported to school staff, it should be investigated and acted on. The Head should also consider whether it is appropriate to notify the police or anti-social behaviour coordinator in their local authority of the action taken against a pupil.

Procedures

In practice, some allegations of bullying may come from parents, not girls. Furthermore in instances of bullying via social websites or similar the victim may be unaware of the situation. In such instances it may well be that senior girls are the first to alert us to what is happening. Thus there are different layers and levels of bullying and we need to respond appropriately in each case.

- The person to whom it is reported (whether adult or senior girl) should listen to the victim's story, offer reassurance and the protection of the school's procedures and explain who else must be put in the picture. She must not promise confidentiality. However she must exert discretion. A written report should be handed to the relevant Form Teacher (or Key Stage representative on the SPT or the Head).

- The Form Teacher or the Head or the relevant SPT member should see the victim and decide with her on the best course of action. If a formal investigation is to take place, the victim will be asked to write a report of the incident.

- Investigate allegations carefully, always remembering that the alleged bully may have a different story to tell. Clarify details and seek corroborating evidence. Where possible, establish facts from an independent source e.g. witness.

- The Form Teacher or the Head or the relevant SPT member should then see the person accused of bullying and ask her to write an account of the incident.

If the bullying is admitted:
- The bully should give a verbal and/or written undertaking that it will not occur again.
- The bully should apologise to the victim.
- The bully should be given counselling and support. A "No blame" approach should be adopted. Efforts should be made to establish reasons for the behaviour.
- The bully's parents should be informed, depending on the seriousness of the offence.

If the bullying is not admitted:

- There should be a second interview with both parties to clarify any necessary points. If the bullying is still not admitted, the person concerned should be warned that the incident has been noted and that it is there for future reference if another similar incident is reported.
- The victim should be informed of the outcome and what action has been taken. Appropriate counselling and support should be given, including advice about what to do if the bullying continues.
- Staff should be informed of the incident, as appropriate, for information only.
- Peer groups / other girls should be made aware of the situation as and when appropriate.
- The form teacher or the Head or the relevant SPT member should record the outcome, file documentation and report to the Deputy Head.
- A record of the bullying/alleged bullying is kept in the Anti-Bullying Record book. Under the Children's Act 1989 a bullying incident should be addressed as a child protection concern when there is 'reasonable cause to suspect that a child is suffering or is likely to suffer significant harm.' When this is the case the school staff should report their concern to the DSL at Wychwood, who is the Head, or to the deputy DSL, the Deputy Head. Staff may also report directly to Children's Social Care but should immediately inform the Head if they have done so.

Cyber bullying
The rapid development of, and widespread access to, technology has provided a new medium for 'virtual' bullying, which can occur in or outside school.
Please also see the following policies: e-Safety Policy
                                               Behaviour and Discipline Policy
                                               ICT Policy
                                               Searching Policy

Definition
This phenomenon has been defined in the following terms: "Cyber bullying involves 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."

Cyber bullying can involve social media sites, all messaging sites, phones, tablets and internet-enabled devices.

Furthermore, under the Malicious Communication Act 2003, it is a criminal offence for a person to send a malicious communication using social media.

Preventative measures
In addition to the preventative measures for bullying described above, Wychwood School:

- expects all pupils to adhere to its Acceptable Usage Agreement for the safe use of the network, internet and mobile phones, whether in or out of school.
- may search any mobile phone or internet enabled device if it is deemed necessary (in accordance with the wider search powers included in the Education Act 2011*), although staff should adhere to the guidance given in the Searching Policy as to whether to view any images found
- blocks certain sites by our filtering system.
- monitors pupils' use.

- may impose sanctions for the misuse, attempted misuse or abuse of the internet, email and computer network facilities.
- issues all pupils with their own personal school email address.
- may block access in school to social networking sites and webmail systems.
- offers guidance on the safe use of social networking sites and cyber bullying in PHSE lessons and through Internet Safety days.
- offers guidance on keeping names, addresses, passwords, mobile phone numbers and other personal details safe.
- prohibits the use of mobile phones in lesson times or where they may cause annoyance to others.
- emphasises that the use of cameras on mobile phones in washing and changing areas or in the bedrooms of boarding houses is prohibited.

* The Education Act 2011 amended the power in the Education Act 1996 to provide that when an electronic device, such as a mobile phone, has been seized by a member of staff who has been formally authorised by the Head, that staff member can examine data or files, and delete these, where there is good reason to do so. This power applies to all schools and there is no need to have parental consent to search through a young person's mobile phone.

If an electronic device that is prohibited by the school rules has been seized and the member of staff has reasonable ground to suspect that it contains evidence in relation to an offence, they must give the device to the police as soon as it is reasonably practicable. Material on the device that is suspected to be evidence relevant to an offence, or that is a pornographic image of a child or an extreme pornographic image, should not be deleted prior to giving the device to the police. If a staff member finds material that they do not suspect contains evidence in relation to an offence, they can decide whether it is appropriate to delete or retain the material as evidence of a breach of school discipline.

Youth Produced Sexual Imagery (Sexts)
Adults should **not** view youth produced sexual imagery unless there is good and clear reason to do so. Wherever possible responses to incidents should be based on what DSLs have been told about the content of the imagery. The decision to view imagery should be based on the professional judgement of the DSL and should always comply with the safeguarding policy and procedures of Wychwood School. Imagery should never be viewed if the act of viewing will cause significant distress or harm to the pupil.

If a decision is made to view imagery the DSL would need to be satisfied that viewing:
- is the only way to make a decision about whether to involve other agencies (i.e. it is not possible to establish the facts from the young people involved)
- is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent in making a report
- is unavoidable because a pupil has presented an image directly to a staff member or the imagery has been found on a school device or network

    If it is necessary to view the imagery then the DSL should:
- Never copy, print or share the imagery; this is illegal.
- Discuss the decision with the DDSL first
- Ensure viewing is undertaken by the DSL or another member of the safeguarding team with delegated authority from the DSL
- Ensure viewing takes place with another member of staff present in the room, ideally the DDSL or a member of the senior leadership team. This staff member does not need to view the images

- Wherever possible ensure viewing takes place on school or college premises, ideally in the Head's or a member of the senior management team's office
- Ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery
- Record the viewing of the imagery in the school's safeguarding records including who was present, why the image was viewed and any subsequent actions
- Ensure this is signed and dated and meets the wider standards set out by ISI for recording safeguarding incidents.

Resources

Resources such as My Daughter (both the "Your Daughter" book and the mydaughter.co.uk website) are available to families, and the DfE Advice for parents and carers on cyberbullying offers the following websites for guidance on bullying and cyberbullying:

Internet Matters https://www.internetmatters.org/issues/cyberbullying/

NSPCC – https://www.nspcc.org.uk/preventing-abuse/
https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/bullying-and-cyberbullying/

Thinkuknow
https://www.thinkuknow.co.uk/

UK Safer Internet Centre https://www.saferinternet.org.uk/advice-centre/parents-and-carers/parental-controls-offeredyour-home-internet-provider

The Parent Zone
https://parentzone.org.uk/home

Childnet http://www.childnet.com/parents-and-carers/what-do-i-need-to-know

Supporting Bullied Children https://www.gov.uk/government/publications/preventing-and-tackling-bullying

Childline https://www.childline.org.uk/info-advice/bullying-abuse-safety/types-bullying/buildingconfidence-bullying/

Anti Bullying Alliance https://www.anti-bullyingalliance.org.uk/tools-information/all-about-bullying

NSPCC Netware
https://www.net-aware.org.uk/

- Digizen: www.digizen.org
- Internet Watch Foundation: www.iwf.org.uk
- The UK Council for Child Internet Safety (UKCCIS)
www.gov.uk/government/groups/ukcouncil-for-child-internet-safety-ukccis

Specific guidance for SEND

• Changing Faces: www.changingfaces.org.uk
• Mencap: www.mencap.org.uk
• Anti-Bullying Alliance Cyberbullying and children and young people with SEN and disabilities: www.cafamily.org.uk/media/750755/cyberbullying_and_send_-_module_final.pdf
• DfE: SEND code of practice: www.gov.uk/government/publications/send-code-of-practice0-to-25

Specific guidance for race, religion and nationality

• Anne Frank Trust: www.annefrank.org.uk
• Kick it Out: www.kickitout.org □ Report it: www.report-it.org.uk
• Stop Hate: www.stophateuk.org
• Tell Mama:www.tellmamauk.org
• Educate against Hate: www.educateagainsthate.com/
• Show Racism the Red Card: www.srtrc.org/educational

Specific guidance for LGBT

• Barnardos LGBT Hub: www.barnardos.org.uk/what_we_do/our_work/lgbtq.htm
• Metro Charity: www.metrocentreonline.org
• EACH: www.eachaction.org.uk
• Proud Trust: www.theproudtrust.org
• Schools Out: www.schools-out.org.uk
• Stonewall: www.stonewall.org.uk Sexual harrassment and sexual bullying
• https://www.allabouttrans.org.uk/about/support-organisations/

Specific guidance for Sexual Harrassment and Sexual Bullying

• Ending Violence Against Women and Girls (EVAW) www.endviolenceagainstwomen.org.uk
• A Guide for Schools: www.endviolenceagainstwomen.org.uk/data/files/resources/71/EVAWCoalition-SchoolsGuide.pdf
• Disrespect No Body: www.gov.uk/government/publications/disrespect-nobodycampaignposters
• Anti-bullying Alliance: advice for school staff and professionals about developing effective anti-bullying practice in relation to sexual bullying: www.anti-bullyingalliance.org.uk/toolsinformation/all-about-bullying/sexual-and-genderrelated

Procedures
If an incident of cyber bullying is reported, the following procedures are adopted:

• The member of staff to whom it was reported or who first discovers the situation, will control the situation, reassure and support the pupils involved.
• He/she will inform the Head or an appropriate member of the senior pastoral team as soon as possible.
• The member of staff will calmly remind the girl of the Acceptable User Policy which she has signed.

- The victim will be interviewed on her own, and asked to write an account of events.
- The perpetrator(s), together with all others who were involved, will be interviewed individually and asked to write an immediate account of events.
- The device(s) used will be searched and screen shots taken of relevant material.
- If necessary, this material will then be removed from the public domain.
- The incident should be recorded.
- All Form Teachers and Housemistresses should be informed. The Head should also be informed.
- The victim will be interviewed at a later stage by a member of the senior pastoral team, separately from the alleged perpetrator. It will be made clear to her why revenge is inappropriate. She will be offered support to develop a strategy to help herself.
- The alleged perpetrator will be interviewed at a later stage by a member of the senior pastoral team, separately from the victim, and it will be made clear why her behaviour was inappropriate and caused distress. She will be offered guidance on modifying her behaviour, together with any appropriate disciplinary sanctions.
- The parents/guardians of all parties may be informed and invited into school to discuss the matter. Their support may be sought.
- A way forward, including disciplinary sanctions and counselling, should be agreed.
- This should recognise that suitable support is needed both for children who are being bullied and for pupils who bully others, as well as dealing with appropriate disciplinary measures.
- A meeting involving all the parties, with close staff supervision, could be helpful in developing a strategy for all concerned to close the episode.
- A monitoring and review strategy will be put in place.
- It is the policy of Wychwood School, Oxford to attempt to resolve such issues internally under the school's own disciplinary procedures, or in collaboration with the pastoral team of another school if this is appropriate, unless the matter is of such gravity that a criminal prosecution is likely. Although bullying in itself is not a specific criminal offence, there are occasions when some types of harassing or threatening behaviours or communications could constitute a criminal act. Wychwood will aim to educate all its pupils and staff so that such incidents do not occur but may have to inform the police in some cases.
- All cases of cyber-bullying will be recorded in the central record of bullying incidents

Guidance to staff in case of Cyberbullying of staff
- Never respond or retaliate to cyberbullying incidents. Report incidents appropriately to a member of SMT/the Head.
- Save evidence of the abuse; take screen prints of messages or web pages and record the time and date.
- When the perpetrator is known to be a current pupil or colleague, the majority of cases will be dealt with through the relevant disciplinary procedure.
- When the perpetrator is known to be an adult, the first action should be for a member of SMT/the Head to invite the perpetrator to a meeting to address their concerns and, if they have a reasonable complaint, to make sure they know how to raise that appropriately with the offender.
- The School could seek advice from specific social networking sites, if their terms are breached, or seek guidance from the LEA legal advisors or support from other agencies, such as The UK Safer Internet Centre.
- Comments that are abusive, threating, sexist, or of a sexual nature, or that constitute a hate crime, may need to be referred to the police. Online harassment is a crime.