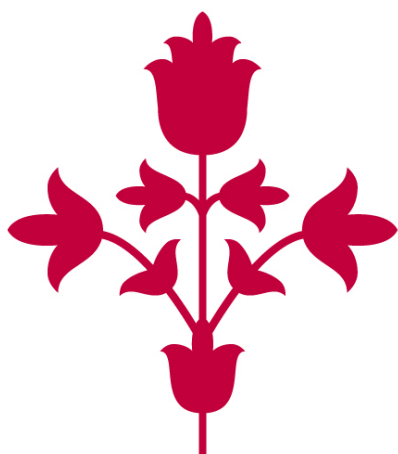




Earlscliffe



STATUTORY SCHOOL POLICY • 2026–27

Anti-Bullying Policy

A whole-school strategy for preventing bullying, protecting pupils and restoring safe relationships.

Headteacher	Dr N Robinson
Deputy Headteacher & DSL	Mr L Connolly
Effective	Sept 1, 2026



Document control

Policy title	Anti-Bullying Policy
School	Earlscliffe
Policy owner	Mr L Connolly, Deputy Headteacher and DSL
Accountable leader	Dr N Robinson, Headteacher
Approval authority	Governing Body
Version	1 - National College-aligned
Prepared	Aug 17, 2026
Effective from	Sept 1, 2026 - subject to approval
Next formal review	Before Sept 1, 2027 - or earlier following statutory, regulatory or school change
Applies to	All pupils, including boarders; all staff, governors, proprietors and volunteers; educational guardians and homestays; and school-arranged activities and transport

2026 COMMENCEMENT NOTE

This edition is designed for operation from September 2026. It reflects Keeping Children Safe in Education 2026, the July 2026 update to the DfE bullying guidance page, the 2026 mobile-phone framework, the May 2026 National Minimum Standards for Boarding Schools and the school's updated Behaviour Policy.

Approval and review record

Control	Record
Approved by	Dr N Robinson
Approval date	01 Sept 2026
Review completed by	Mr L Connolly
Date of next review	Before Sept 1, 2027

Changes in this edition

- Leadership and ownership updated to Dr N Robinson as Headteacher and Mr L Connolly as Deputy Headteacher and DSL; presentation aligned with the Earlscliffe 2026–27 policy suite.
- Cross-referenced against The National College model while removing maintained-school-only instructions and adapting roles, reporting and intervention to Earlscliffe's independent boarding context.
- Clarifies the definition of bullying, the treatment of one-off harmful incidents, power imbalance, prejudice-based bullying, retaliation, group dynamics and the distinction from ordinary conflict.
- Strengthens child-on-child abuse, sexual bullying, safeguarding thresholds, terminology, victim-centred risk management and coordination with police or children's social care.
- Expands cyberbullying to include doxxing, impersonation, pile-ons, sextortion, non-consensual image sharing, AI-generated or manipulated imagery and evidence-preservation safeguards.
- Adds tailored provisions for boarders, international pupils, pupils with SEND or medical needs, new joiners and pupils who face barriers to reporting.
- Introduces clearer response times, fair fact-finding, safety planning, restorative safeguards, follow-up checks and support for the pupil harmed, the pupil responsible and witnesses.
- Adds a central bullying record, termly equality and boarding analysis, report and support forms, a source register and a pre-approval implementation checklist.

Priority decisions before approval

- Confirm the pupil-facing reporting routes, including whether the online/QR form accepts anonymous reports and who monitors it during evenings, weekends and holidays.
- Confirm the named operational owner of the central bullying register and the termly reporting route to the Governing Body.
- Align terminology, sanctions, phone procedures, search practice and follow-up expectations across Behaviour, Safeguarding, Online Safety, SEND and Boarding documents.



Anti-bullying at a glance

CORE COMMITMENT

Bullying is not tolerated or normalised. Every concern is heard, immediate safety is addressed, safeguarding thresholds are checked, facts are established fairly and support continues until the school is satisfied that harm and retaliation have stopped.

If a pupil tells you...	Do now	Then
"Someone is bullying me"	Listen calmly; thank them; establish immediate safety; do not promise secrecy or demand proof.	Record the pupil's words and report promptly to the tutor/boarding lead and Deputy Headteacher; contact the DSL immediately where safeguarding may be engaged.
"It was only banter"	Focus on impact, consent, repetition, power and context. Stop harmful conduct.	Do not use the label to minimise abuse. Check for a pattern, prejudice, sexual conduct, coercion or retaliation.
"It happened online"	Do not retaliate or circulate content. Preserve URLs, usernames, dates and screenshots where safe.	Follow online-safety and safeguarding routes. Do not view, copy or forward suspected sexual images of a child.
"I saw it happen"	Protect the reporting pupil from retaliation and record what they directly saw or heard.	Separate fact from inference; consider group dynamics and support for witnesses and active bystanders.
"I'm not safe tonight"	Treat as urgent. Arrange supervision, accommodation or contact controls and summon senior/DSL support.	Notify parents when safe and appropriate; make external referrals where required; document the safety plan and review point.

Non-negotiable safeguards

- A pupil is never blamed for being bullied, required to face the pupil alleged to have harmed them, compelled to apologise or pressured into restorative work.
- A report made in good faith is protected. Unsubstantiated, unfounded or withdrawn reports are not automatically malicious.
- Disciplinary action does not delay a safeguarding referral, emergency response, medical care or police/social-care action.
- No member of staff views, copies, prints or forwards suspected nude or semi-nude imagery of a child, including AI-generated or manipulated content.
- The burden of change is not placed only on the pupil harmed; any movement, class, activity, boarding or device arrangements are risk assessed and reviewed.
- Confidentiality is respected but cannot be absolute. Information is shared on a need-to-know basis to protect children and conduct a fair response.

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1. Purpose, scope and principles

Earlscliffe is committed to a safe, respectful and inclusive community in which every pupil can learn, live and flourish free from intimidation, humiliation, discrimination and fear. Bullying can damage mental health, identity, relationships, attendance, academic progress and a pupil's sense of belonging. It can also harm witnesses, wider groups and pupils who engage in bullying behaviour. The school prevents bullying so far as reasonably practicable and responds promptly when concerns arise.

This policy applies during the academic day and boarding time; on school premises; while a pupil is under school charge; on visits, transport, work experience, activities, homestays and school-arranged accommodation; and to online or off-site behaviour that affects safety, welfare, relationships, the orderly running of Earlscliffe or the school community.

Its main focus is bullying between pupils. Harm by a pupil towards a staff member is addressed under the Behaviour Policy and staff-protection procedures. A concern that an adult has harmed a pupil is never handled as ordinary bullying: it follows the Safeguarding and Child Protection Policy, staff code and allegations procedure. Staff-to-staff bullying follows employment procedures.

Core principles

- Prevention and early intervention are central. Adults teach respectful conduct, supervise intelligently, notice exclusion and challenge harmful language before patterns become established.
- The school responds to conduct and harm, not labels alone. A concern is addressed even where the full definition of bullying is not yet established.
- Safeguarding takes priority. Bullying may be child-on-child abuse and may require the DSL, children's social care, police or another agency.
- Pupil voice and preferred terminology are respected. The school may still act where a pupil does not want action if protection of that pupil or others requires it.
- Decisions are fair, evidence-based and proportionate. Immediate protective measures are not a finding of guilt.
- Accountability, sanction, education, support, repair and reintegration are compatible and may operate together.
- The school considers age, maturity, SEND, disability, health, language, culture, boarding context, trauma, power imbalance and safeguarding without excusing harmful conduct.
- Retaliation, intimidation, witness interference and attempts to silence reporting are themselves serious concerns.

2. Legal and regulatory framework

This strategy has regard to legislation, statutory guidance and regulatory standards applicable to an independent boarding school in England. In particular:

- The Education (Independent School Standards) Regulations 2014, especially Part 3 paragraph 10, requiring an effective strategy to prevent bullying so far as reasonably practicable, and paragraphs 7 and 9 on welfare and behaviour.
- The National Minimum Standards for Boarding Schools, updated May 2026, especially the standards on behaviour, countering bullying, relationships, boarders' views and records.
- Keeping Children Safe in Education 2026, in force from Sept 1, 2026, and Working Together to Safeguard Children 2026.

- Equality Act 2010 duties concerning discrimination, harassment, victimisation and reasonable adjustments; Human Rights Act 1998 principles where applicable.
- Protection from Harassment Act 1997; Public Order Act 1986; Crime and Disorder Act 1998; Malicious Communications Act 1988; Communications Act 2003; and relevant offences concerning threats, stalking and harassment.
- Protection of Children Act 1978, Sexual Offences Act 2003, Voyeurism (Offences) Act 2019, Online Safety Act 2023, Data (Use and Access) Act 2025 and Crime and Policing Act 2026 where image-based, sexual or AI-enabled conduct may be criminal.
- DfE Preventing and tackling bullying; Behaviour in schools; Mobile phones in schools; Relationships Education, RSE and Health Education; Searching, screening and confiscation; and UKCIS advice on sharing nudes and semi-nudes.

INDEPENDENT-SCHOOL CONTEXT

Section 89 of the Education and Inspections Act 2006 is commonly cited in model policies for state schools. Earlscliffe's direct regulatory duty is the Independent School Standards requirement to draw up and implement an effective anti-bullying strategy. This policy also aligns with relevant national good practice.

3. Definition and thresholds

Bullying is behaviour by an individual or group that is intended to hurt, frighten, humiliate, exclude, coerce or undermine another person and is commonly characterised by repetition and an imbalance of power. Power may arise from age, size, status, popularity, group numbers, language, information, technology, money, social influence, a protected characteristic, vulnerability or control of access to friendships, spaces or resources.

Feature	Questions the school considers
Harm	What was said or done? What was the impact on safety, dignity, belonging, health, learning, property or relationships?
Pattern	Was it repeated, planned, shared, reposted or reinforced by a group? Is there earlier conduct or a threat of recurrence?
Intent and awareness	Was harm intended, reckless or continued after impact or a boundary was clear? What should the pupil reasonably have understood?
Power	Was there real or perceived inequality, dependency, coercion, social leverage, anonymity or difficulty escaping?
Context	Is the conduct prejudice-based, sexual, retaliatory, online, connected to boarding or linked to safeguarding, SEND or unmet need?

One-off incidents and conflict

A single disagreement, falling-out or unkind act is not automatically bullying. Equally, one incident can be serious abuse, expose a wider pattern, create a continuing online audience or cause an enduring threat. The school intervenes according to harm and risk and does not withhold support merely because repetition or intent has not yet been established.

Ordinary conflict generally involves a more equal relationship and a mutual disagreement in which both parties can express their position and seek resolution. Bullying involves harm and misuse of power. Mutual conflict, retaliation and harmful behaviour can coexist; staff do not assume equal responsibility simply because both pupils reacted.

4. Forms of bullying and prejudice-based conduct

Bullying may be direct or indirect, overt or subtle, in person or online. Several forms may operate together:

Form	Illustrative conduct
Physical or material	Hitting, pushing, blocking, intimidation, unwanted contact, theft, extortion, damaging or hiding possessions, food or money.
Verbal or written	Name-calling, threats, mocking, humiliation, rumours, hostile “jokes”, imitation, comments about appearance, accent, family or ability.
Relational or social	Deliberate exclusion, ostracism, controlling friendships, public embarrassment, isolating a pupil, group pressure or withdrawal of belonging.
Sexual or gender-based	Sexual remarks, rating, rumours, coercion, unwanted touching, sexualised images, sexist or misogynistic conduct, homophobic, biphobic or transphobic abuse.
Initiation or hazing	Rituals, dares, tests, humiliation, violence, forced consumption, nudity, recording or secrecy imposed as a condition of group membership.
Online or technology-assisted	Harassing messages, impersonation, fake accounts, exclusion from groups, pile-ons, doxxing, manipulated media, threats, stalking or non-consensual sharing.

Prejudice-based bullying

Bullying may target actual, perceived or associated characteristics or circumstances, including race, colour, nationality, ethnicity, language, religion or belief, sex, sexual orientation, gender reassignment, disability, SEND, health, pregnancy, family composition, adoption, care experience, caring responsibilities, socioeconomic circumstances or high attainment. The school records the prejudice element even where the wider definition of bullying is not established, so discriminatory patterns are not hidden.

LANGUAGE AND IDENTITY

Pupils may use different language about identity and may not wish to disclose a protected or personal characteristic. Staff do not require disclosure, speculate, “out” a pupil or contact parents about identity without considering the pupil’s wishes, safety and safeguarding guidance.

5. Roles and responsibilities

Governing Body and proprietor

- Approve and assure effective implementation of this strategy and its alignment with safeguarding, behaviour, boarding, equality, SEND, online-safety and complaints arrangements.
- Receive regular anonymised analysis of incidents, protected-characteristic and boarding trends, serious cases, repeated concerns, follow-up and pupil/parent voice.
- Ensure leaders have sufficient authority, staffing, training, systems and pastoral resources to prevent and respond to bullying.
- Challenge disproportionality, weak recording, retaliation, recurring locations or groups, and evidence that pupils do not feel safe to report.

Headteacher - Dr N Robinson

- HoldS overall accountability for culture, prevention, resources, staff authority, publication and consistent implementation.
- Determine serious sanctions and external suspension or permanent exclusion/expulsion under the Behaviour Policy and parent contract.
- Ensure complaints, appeals and concerns about implementation are considered fairly and without retaliation.

Deputy Headteacher and DSL - Mr L Connolly

- OwnS day-to-day implementation, central recording, serious-case oversight, safety planning, parental communication and termly analysis.
- Decide and coordinate safeguarding action as DSL, including external referral and liaison with police or children's social care.
- Coordinate tutors, boarding leads, learning support/SENCO, counselling, medical and academic staff and ensure follow-up continues until risk and recurrence are addressed.
- Report anonymised assurance to the Headteacher and Governing Body and direct prevention work where patterns emerge.

All staff, tutors and boarding staff

- Model respectful relationships, challenge harmful language and exclusion, supervise actively and teach pupils how to report and act as safe bystanders.
- Listen, protect, record and report; do not minimise, investigate beyond competence, force reconciliation or promise confidentiality.
- Know relevant needs and safety plans on a need-to-know basis, implement agreed controls consistently and notice changes over time.
- Tutors and boarding leads maintain regular contact, monitor friendship and house dynamics and deliver agreed check-ins and reintegration work.

Pupils and parents

Pupils are expected not to bully, reinforce, share or retaliate; to report concerns safely; preserve relevant evidence; respect confidentiality; and participate honestly in support or investigation. Parents and educational guardians should report concerns promptly, avoid direct confrontation with other pupils or families, preserve evidence, support safety arrangements and use the complaints route if dissatisfied. Reporting in good faith is protected.

6. Prevention, culture and curriculum

Earlscliffe prevents bullying through a whole-school culture in which Aspiration, Community, Curiosity, Personal Development and Respect are explicitly taught and modelled. Prevention is informed by pupil voice and by analysis of incidents, near misses, locations, times, online trends and residential life.

Preventative layer	Earlscliffe practice
Culture and induction	Clear rules and reporting routes; international and boarding induction; language support; repeated reminders after holidays, new admissions or emerging risks.
Curriculum	Age-appropriate PSHE/RSE, tutorials, computing and assemblies on consent, equality, healthy relationships, coercion, harassment, online influence, AI, sextortion, bystander action and help-seeking.
Environment and supervision	Risk-led deployment in classrooms, dining, transitions, transport, activities and boarding; attention to hidden spaces, queues, bedrooms, group chats and unsupervised times.
Relationships and belonging	Tutor and house contact, mixed activities, pupil leadership, inclusive clubs, support for new joiners and opportunities to widen friendship networks without blaming an isolated pupil.
Digital prevention	Phone-free teaching day, filtering and monitoring, acceptable-use education, private family contact for boarders, staff modelling and rapid response to online harm.
Early support	Timely response to loneliness, anxiety, attendance change, prejudice, harmful beliefs, unmet SEND/SEMH need, conflict, group instability or previous victimisation.

Pupil leaders may promote inclusion and reporting but do not investigate formal concerns, impose sanctions, search devices, mediate unsafe cases or receive information beyond their role. The school does not rely on peer mediation where there is abuse, coercion or unequal power.

7. Signs, vulnerability and barriers to reporting

No sign proves bullying, and absence of visible signs does not mean harm is absent. Staff and parents remain alert to changes such as:

- unwillingness to attend, return to school, enter a lesson, boarding area, dining room, activity or transport; repeated lateness or absence;
- injury, damaged or missing property, unexplained spending, requests for money, hunger, sleep disturbance or frequent physical symptoms;
- decline in work, concentration, participation, confidence, friendships, self-care or usual interests; changing accent, clothing or behaviour to avoid attention;
- withdrawal, anxiety, anger, hypervigilance, nightmares, self-harm, suicidal talk, running away, going missing or fear of being alone;
- distress around messages, devices or notifications; deleting accounts, sudden secrecy, excessive checking, being excluded from groups or loss of access to accounts;
- dominating others, repeated “jokes”, group control, cruelty, unexplained possessions, escalating prejudice, fascination with humiliating content or distress when devices are removed.

Vulnerability and reporting barriers

Additional vulnerability may arise from SEND, disability, health needs, language, culture, boarding away from home, recent admission, care or adoption experience, caring responsibilities, socioeconomic difference, bereavement, trauma, identity, family circumstance, previous abuse or limited peer support. A pupil may fear disbelief, retaliation, loss of friendships, being “outed”, parental reaction, device removal, immigration or cultural consequences, or making matters worse.

Staff provide accessible routes, interpreters or communication support where needed; use open, concrete and non-leading questions; offer a trusted adult; and explain what will happen next. A pupil is not required to confront another pupil or make a written statement before safety action is taken.

8. Reporting routes

A pupil, parent, staff member or witness may report verbally or in writing to any trusted adult, including a tutor, teacher, boarding member of staff, counsellor, medical staff member, Deputy Headteacher, DSL or DDSL. Concerns may also be submitted through the school’s published online or QR reporting route. Anonymous reports are reviewed, though anonymity may limit fact-finding.

Staff report suspected bullying promptly to the pupil’s tutor or relevant boarding lead and to the Deputy Headteacher. They contact the DSL immediately where there is possible significant harm, sexual conduct, exploitation, coercion, image-based abuse, serious violence, hate crime, self-harm, suicidal ideation, going missing, criminality or urgent risk. Immediate danger is reported to emergency services.

What to include

- the pupil’s own words and preferred terminology; who, what, when, where and how often;
- immediate safety, injury, distress, retaliation, witnesses, group or boarding dynamics and whether the pupil feels safe to return;
- online platforms, usernames, links, dates, times, circulation, screenshots or other evidence that can be preserved safely;
- known SEND, communication, medical, cultural, language or safeguarding factors and any reasonable adjustment requested;
- action already taken and who has been informed.

NO WRONG DOOR

The adult receiving a report owns the handover. A pupil is not sent from person to person or told to report again elsewhere. The receiving adult records and passes on the concern and confirms who will follow up.

9. Immediate staff response

Action	Expected practice
Listen and affirm	Thank the pupil; say they have done the right thing; listen without shock, disbelief, blame or interrogation.
Check safety	Establish immediate risk, injury, medical need, location, contact tonight, digital access, transport and whether anyone else may be at risk.
Explain limits	Do not promise secrecy. Explain that information will be shared only with people who need it to help and protect.
Preserve the account	Record promptly, accurately and factually, distinguishing the pupil's words, observed fact and professional judgement.
Do not mediate	Do not bring pupils together, require apology, ask the pupil to collect evidence from the alleged perpetrator or tell them to ignore or fight back.
Escalate and confirm	Pass the record to the appropriate lead, use the DSL route where required and tell the pupil what will happen next and when they will hear from an adult.

A normal concern should be acknowledged and assigned to an appropriate lead on the same school day. Urgent safety or safeguarding concerns are acted on immediately. Parents are informed promptly when appropriate, normally on the same day for significant concerns, unless doing so may place a child at greater risk, prejudice an external enquiry or conflict with safeguarding advice.

10. Assessment and fair fact-finding

The Deputy Headteacher or a suitable delegated senior colleague assesses the concern and decides whether the matter is bullying, another behaviour concern, child-on-child abuse, a safeguarding matter, a criminal concern or a combination. The label may change as information emerges; safety and support do not wait for a final classification.

Investigation safeguards

- Pupils are spoken with separately in a private, suitable space. Accounts are gathered without confrontation, leading questions or premature findings.
- The investigator considers direct evidence, consistency, context, pattern, power, impact, earlier records, digital material, witness accounts and plausible alternative explanations.
- Only information necessary for fairness and safety is disclosed. Pupils are instructed not to retaliate, intimidate, coordinate accounts or share confidential material.
- Reasonable adjustments are made for language, SEND, communication, trauma, health and cultural context. A trusted adult may support a pupil where this does not compromise the process.
- External safeguarding or police enquiries take priority. Internal action is coordinated so it does not prejudice evidence or increase risk.
- Findings use the civil standard of proof - balance of probabilities - for internal decisions, subject to the parent contract and any applicable procedure.
- The decision records what was established, what was not established, the classification, reasons, safety and support, sanction, parental communication and review date.

Protective measures during assessment

The school may adjust supervision, seating, activities, transport, digital contact, boarding arrangements, room access or timetables while facts are established. These are neutral safety measures, not disciplinary findings. Leaders consider the wishes and convenience of the pupil harmed and avoid creating an informal exclusion or making that pupil carry the burden of separation.

11. Safeguarding, child-on-child abuse and sexual bullying

Bullying may be a form of child-on-child abuse. It can occur inside or outside school and online, between children of any age or sex, and within intimate, friendship, house, activity or peer-group relationships. The absence of a report does not mean abuse is absent. Staff never dismiss harmful conduct as banter, “boys being boys”, joking or part of growing up.

Sexual bullying may include sexualised name-calling, rumours, rating, coercion, unwanted contact, deliberate touching, exposing, upskirting, sexual comments, misogyny, homophobia, threats, non-consensual recording, sharing or manipulating images, sextortion, sexual violence or harassment. Such conduct is referred to the DSL and handled under the Safeguarding and Child Protection Policy. The DSL considers risk to the harmed pupil, alleged pupil, witnesses, siblings and wider community and whether children’s social care or police should be involved.

Safeguarding approach

- Use the terminology with which the child is comfortable; do not require them to accept the label “victim”.
- Consider whether the pupil alleged to have caused harm may also be experiencing abuse, exploitation, trauma or unmet need, without reducing accountability or protection.
- Do not require face-to-face restorative work in sexual or coercive cases. Any contact is voluntary, risk assessed and professionally facilitated.
- Do not promise parents or pupils a particular sanction or external outcome. Explain the process, safeguarding constraints and available review or complaints route.
- Protect against retaliation and social-media discussion and review safety after any police, social-care, disciplinary or boarding decision.

12. Cyberbullying, image-based abuse and AI

Cyberbullying can invade home and boarding life, reach a large audience, persist through reposting, conceal identity and continue at any time. A single upload or post may create repeated exposure. The school may respond to online conduct away from school where the threshold in section 17 is met.

Online form	Examples
Contact and exclusion	Threatening or humiliating messages, repeated contact, silent calls, blocking and unblocking, exclusion from groups, hostile polls, mass reporting or pile-ons.
Identity and information	Impersonation, account compromise, fake profiles, outing, doxxing, revealing private information, location tracking or password misuse.
Images and media	Non-consensual recording, altered images, memes, deepfakes, “nudification”, AI-generated sexual or humiliating content, circulation of private images or live streams.
Reputation and coercion	Rumours, defamation, threats to disclose information, blackmail, sextortion, coercion to send content, rating or sexual commentary.

Online form	Examples
Gaming and platforms	Griefing, coordinated exclusion, threats, theft of digital property, hostile voice chat, stalking across platforms or misuse of generative AI tools.

Safe response to online evidence

- Do not retaliate, engage in a public argument or ask pupils to obtain more material from the person causing harm.
- Preserve usernames, URLs, dates, times, message context and screenshots where safe. Do not unnecessarily download or redistribute harmful content.
- Suspected nude or semi-nude imagery of a child — including AI-generated or manipulated content — is not viewed, copied, printed or forwarded. Secure the device and contact the DSL for the UKCIS safeguarding route.
- Use platform reporting, blocking, account security and removal routes where appropriate. Police, the Internet Watch Foundation or specialist services may be involved through the DSL.
- A confiscated device is not searched merely because it has been taken. Any search or examination follows law, guidance and the separate Search and Confiscation Policy.
- The pupil harmed is not routinely deprived of safe digital access or family contact as a consequence of reporting; protective controls are proportionate and reviewed.

AI-ENABLED ABUSE

Creating, requesting, threatening to create or circulating AI-manipulated sexual or humiliating images may be bullying, child-on-child abuse and a criminal matter. Staff preserve safety and evidence without handling illegal imagery and make an immediate DSL referral.

13. Safety, support and follow-up

Support begins when a concern is raised and is tailored with the pupil rather than imposed. It may continue whether or not the full bullying definition or a disciplinary finding is established.

For the pupil harmed

- a named trusted adult and clear check-in schedule, including evening/weekend boarding arrangements;
- a written safety plan covering contact, lessons, boarding, dining, transport, activities, devices, witnesses and reporting recurrence;
- medical, counselling, pastoral, SEND, academic or external support; reasonable adjustments for attendance, concentration, sleep or assessments;
- support to report/remove online content, secure accounts, block contact and preserve evidence;
- careful widening of peer support and belonging opportunities without implying that the pupil caused their isolation;
- regular updates in age-appropriate language, an explanation of decisions and access to the complaints route.

For witnesses and the wider group

Witnesses may need reassurance, confidentiality, help to manage guilt or fear and protection from retaliation. Leaders may undertake group, house, class or curriculum work without identifying individuals. General education is not used to expose a pupil's report or substitute for individual accountability.

Follow-up

The named lead checks safety and recurrence after the initial action, normally within two school days for significant cases, then at agreed intervals such as one week, one month and half-term. Frequency is driven by risk and pupil voice. A case is not closed merely because a sanction ended or no further report was received. Closure records the pupil's view, objective evidence, remaining controls and how recurrence can be reported.

14. Accountability, repair and support for pupils who bully

A pupil responsible for bullying is held accountable and helped to stop. Leaders consider motivation, beliefs, group influence, previous victimisation, exploitation, SEND, communication, mental health, trauma, home or boarding context and whether the pupil is also at risk. Understanding these factors informs intervention but does not excuse harm.

- clear explanation of the finding, impact, boundary, sanction and future expectations;
- reflection or targeted education on empathy, consent, prejudice, healthy relationships, online conduct, bystander influence and repair;
- a behaviour support plan with triggers, supervision, digital/contact controls, trusted adults, success measures and review dates;
- pastoral, counselling, SEND/SEMH, medical, family or external support where indicated;
- work to leave harmful groups, challenge beliefs, repair property or loss and rebuild safe participation;
- restorative work only where the pupil harmed freely agrees, risk is low, power is addressed and a trained adult facilitates.

An apology may be part of repair but is not proof of resolution and is never compelled from the pupil harmed. A written apology is not passed on where it may manipulate, blame, pressure or reopen contact. Support for the pupil responsible runs alongside, not instead of, proportionate consequences.

15. Sanctions and serious or persistent bullying

Bullying is sanctioned under the Behaviour Policy and parent contract. The response considers seriousness, persistence, harm, prejudice, sexual or safeguarding context, planning, audience, group role, retaliation, honesty, previous support, mitigation, SEND and risk of recurrence. The school may move directly to a higher stage where safety or seriousness requires it.

Circumstance	Possible response
Emerging harmful conduct	Teaching, correction, strike or detention; record the prejudice or bullying concern; targeted supervision and early support.
Established or repeated bullying	Stage 2 or 3 sanction, parent meeting, structured reflection, behaviour support plan, contact controls, restitution and monitored reintegration.
Serious abuse or persistent bullying	Internal or external suspension, safeguarding and external-agency action, risk plan, major-sanction record and formal review.
Grave or unremedied risk	Permanent exclusion/expulsion or required-removal route under the parent contract and published procedure, with an impartial review/appeal route.

The harmed pupil and their parents are told that action has been taken and given sufficient information about safety and support. The school does not disclose confidential details of another pupil's sanction, needs or safeguarding history. Suspension or exclusion is not automatic, but serious or persistent bullying may justify it. Informal exclusion is not used.

16. Boarding and international pupils

Bullying in boarding can be inescapable because pupils share accommodation, meals, free time and social networks. International pupils may be far from family, new to English or UK school culture and dependent on peers for belonging. House dynamics, bedrooms, bathrooms, kitchens, laundry, queues, transport, curfews, money, food, cultural or language differences, family contact and online groups require particular attention.

- Boarding rules, rights, reporting routes and consequences are explained at induction in accessible language and revisited through house meetings and individual contact.
- Boarding staff record and hand over concerns so patterns across day and night are not missed. Academic and boarding teams coordinate one plan and avoid duplicated or contradictory sanctions.
- A pupil can report privately to boarding staff, the DSL/DDSL, Deputy Headteacher, another trusted adult, educational guardian or independent listener route published by the school.
- Room or house moves are not a default burden placed on the pupil harmed. Any change considers safety, wishes, privacy, friendship, education and the effect of appearing to punish the reporter.
- Safety measures do not unreasonably restrict sleep, food, toilets, medication, worship, education, private family contact or access to confidential help.
- Educational guardians, homestays and trip providers report concerns promptly but do not conduct the school's investigation or impose school sanctions independently.

17. Bullying beyond the school site

Earlscliffe may respond to conduct outside the premises, including online conduct, when the pupil is under school charge; travelling to or from school; identifiable as an Earlscliffe pupil; participating in school-linked activity or accommodation; or where the conduct could reasonably affect a person's safety or welfare, disrupt the orderly running of the school, damage relationships within the community or bring the school into disrepute in a manner connected to the conduct.

The response considers connection to school, evidence, jurisdiction, safeguarding, police involvement, privacy, freedom of expression and proportionality. Lawful criticism, protest, reporting wrongdoing or making a complaint in good faith is not bullying merely because it is unwelcome or affects reputation. The school addresses the conduct and harm, not simple reputational discomfort.

During visits, transport, work experience, homestays and activities, the supervising adult takes immediate safety action and reports promptly. Earlscliffe retains responsibility for its own safeguarding and disciplinary decisions and coordinates with the provider or another school where relevant.

18. SEND, disability, medical and mental-health needs

Pupils with SEND, disabilities, medical conditions or SEMH needs may be more vulnerable to bullying, have difficulty recognising or reporting it, communicate impact differently or be misinterpreted as provoking conduct. They may also engage in harmful behaviour. The school avoids stereotypes and assesses each pupil individually.

- provide accessible reporting, communication support, extra processing time, visual prompts, a trusted adult, sensory considerations or an advocate where appropriate;
- consider whether conduct relates to social communication, impulsivity, trauma, anxiety, health or unmet provision, while maintaining legitimate safety and dignity expectations;
- make reasonable adjustments to process, support and sanction without automatically lowering expectations or exposing others to harm;
- involve learning support/SENCO, medical, counselling or external specialists and review provision after serious or repeated incidents;
- record discriminatory or ableist elements and analyse whether pupils with SEND or health needs experience disproportionate targeting or sanction;
- avoid “resilience” work that implies responsibility lies with the pupil harmed or that teaches them to tolerate abuse.

19. Records, data, confidentiality and information sharing

All alleged bullying concerns are recorded in the school's central bullying record, including cases not ultimately classified as bullying. Routine behaviour and sanctions are recorded in iSAMS; safeguarding-relevant information is recorded in CPOMS and referred to the DSL. One system does not substitute for another. Serious boarding incidents are also entered in the records required by the National Minimum Standards.

Minimum record

- date, location, reporter, pupils and witnesses; form, prejudice element, online/boarding context and immediate risk;
- the pupil's account and preferred terminology; evidence, fact-finding, classification, finding and reasons;
- DSL decision and external referrals; parents informed or reason for delay/non-notification;
- protective measures, support, reasonable adjustments, sanction, repair and responsible adults;
- follow-up dates, pupil and parent views, recurrence, closure rationale and lessons learned.

Termly analysis

The Deputy Headteacher and Headteacher review at least termly the number, nature, seriousness, locations, times, groups, online platforms, repeat involvement, sanctions, support, follow-up, complaints and outcomes. Analysis tests for patterns across sex, race, nationality, language, religion or belief, sexual orientation, gender reassignment, disability, SEND, health, year group, house and day/boarding status. Small-number reporting is anonymised to protect privacy.

Personal information is shared lawfully and on a need-to-know basis for safeguarding, fairness, support and accountability. Records are factual, secure, access controlled and retained under the school's retention schedule. Subject-access or correction requests are handled under data-protection law, safeguarding and third-party rights.

20. Complaints, training, monitoring and review

Concerns and complaints

A pupil or parent who is dissatisfied with how a bullying concern was handled should first raise this with the Deputy Headteacher or Headteacher, unless either is the subject of the concern. The school's Complaints Procedure then applies. A complaint does not stop immediate protection, safeguarding or support and does not result in retaliation. Disagreement with a confidential sanction does not entitle one family to another pupil's personal information.

Training and assurance

All staff receive induction and regular refreshers on definitions, prejudice, child-on-child abuse, sexual harassment, online and AI-enabled harm, boarding dynamics, SEND, reporting, recording, evidence, immediate safety, confidentiality and restorative safeguards. Leaders test understanding through case review, record sampling, supervision, pupil/parent voice and analysis of whether reports are recognised and followed up consistently.

Review

The Governing Body receives regular anonymised assurance. Findings inform curriculum, supervision, staffing, training, boarding practice, technology controls, individual support and policy alignment. This strategy is reviewed at least annually and sooner after a serious incident, statutory or regulatory change, pattern, disproportionality, complaint, safeguarding learning, inspection finding or material operational change. The approved policy is published and explained to pupils, parents and educational guardians.

Appendix A — Response pathway

Stage	Action	Owner / record
1. Receive	Listen, affirm, check immediate safety and medical need; explain confidentiality; preserve the pupil's words.	Any adult. Prompt factual note.
2. Escalate	Same-day handover to tutor/boarding lead and Deputy Headteacher. Immediate DSL/emergency route where threshold is met.	Receiving adult owns handover. CPOMS if safeguarding.
3. Protect	Supervision, contact, digital, lesson, activity, transport or boarding controls; parent contact when safe and appropriate.	Deputy/DSL with relevant pastoral and boarding leads.
4. Assess	Classify concern; gather separate accounts and evidence; check pattern, power, prejudice, SEND, safeguarding and external-agency constraints.	Appropriate uninvolved lead. Central bullying record.
5. Decide	Record finding and reasons; support, sanction, repair, referral and communication. Do not force contact or disclose confidential sanctions.	Deputy/Headteacher/DSL under relevant policies.
6. Follow up	Check safety and recurrence; review controls, pupil/parent voice and wider group; continue until closure criteria are met.	Named lead. Dates and outcomes recorded.
7. Learn	Analyse patterns, supervision, curriculum, systems and disproportionality; report anonymised assurance.	Deputy and Headteacher; Governing Body oversight.

Safeguarding triggers requiring immediate DSL contact

- sexual violence or harassment; nude/semi-nude or AI-generated sexual imagery; sextortion; coercive or controlling behaviour;
- serious violence, weapon, hate crime, stalking, exploitation, criminality, significant injury or threat of serious harm;
- self-harm, suicidal ideation, going missing, fear of returning to boarding or home, or credible urgent risk;
- a pattern suggesting abuse, significant harm, wider victims, adult involvement or risk to other children.

Appendix B - Bullying concern and incident record

Pupil / year / house	
Reporter / relationship	
Date / time / location / platform	
Immediate safety and medical action	
Pupil's account and preferred terminology	
Alleged conduct, pattern, power and impact	
Form / prejudice element / online / boarding	
Witnesses and other pupils at risk	
SEND, communication, medical or cultural adjustments	
Evidence preserved and handling safeguards	
DSL decision / agencies / police	
Parents / guardians informed	
Finding, classification and reasons	
Protection, support, sanction and repair	
Named lead / follow-up dates / closure	

Record observed facts, reported information, professional judgement and decisions distinctly. Do not attach or reproduce suspected sexual imagery of a child.

Appendix C - Safety, support and follow-up record

Pupil / year / house	
Named trusted adult / lead	
What the pupil says will help	
Immediate and overnight safety	
Lessons / dining / activities / transport	
Boarding / room / house arrangements	
Online contact / accounts / evidence / removal	
Medical / counselling / SEND / academic support	
Parent / guardian / external-agency contribution	
Witness and retaliation safeguards	
Support and controls for pupil responsible	
Two-day check	
One-week check	
One-month / half-term check	
Pupil and parent views / evidence of impact	
Changes agreed / closure rationale	

Appendix D - Source register and implementation checklist

Primary framework reviewed

- The Education (Independent School Standards) Regulations 2014 - Part 3, especially paragraphs 7, 9 and 10.
- National Minimum Standards for Boarding Schools - updated May 2026, especially behaviour, countering bullying, relationships, boarders' views and records.
- Keeping Children Safe in Education 2026 - comes into force on 1 September 2026; Working Together to Safeguard Children 2026.
- DfE Preventing and tackling bullying - main advice 2017; GOV.UK collection updated July 2026.
- DfE Behaviour in schools - updated Feb 2024; Mobile phones in schools - statutory guidance updated June 2026.
- DfE Relationships Education, Relationships and Sex Education and Health Education statutory guidance - 2025 framework for implementation in 2026.
- UKCIS Sharing nudes and semi-nudes; NCA/CEOP guidance on AI-generated child sexual abuse material and financially motivated sexual extortion.
- Equality Act 2010 and relevant legislation on harassment, communications, sexual offences, image-based abuse and AI-generated intimate imagery.
- The National College Anti-Bullying Policy model - published for the Sept 2025 framework and used as a structural benchmark with 2026 updating.

Pre-approval implementation checklist

- ☐ Confirm the current 2026–27 pastoral and boarding role map and replace any generic references with approved job titles.
- ☐ Publish pupil-facing reporting routes in accessible language; confirm online/QR form ownership, anonymous-report handling and out-of-hours monitoring.
- ☐ Create the central bullying record with form, prejudice, safeguarding, boarding, SEND, outcome and follow-up fields; agree termly reporting.
- ☐ Align iSAMS and CPOMS use so behaviour, bullying and safeguarding records are distinct but cross-referenced appropriately.
- ☐ Brief staff on same-day handover, immediate DSL triggers, safe handling of online evidence and the prohibition on viewing/copying sexual imagery.
- ☐ Update PSHE/RSE, tutorial and boarding induction for AI-generated abuse, sextortion, misogyny, consent, reporting, bystander action and healthy online relationships.
- ☐ Map high-risk academic, transport and boarding locations/times and confirm supervision, evening/weekend escalation and private reporting access.
- ☐ Align Behaviour, Safeguarding, Online Safety, Search and Confiscation, SEND, Mobile Devices, Boarding and Complaints documents and terminology.
- ☐ Confirm follow-up expectations, named-lead capacity, counselling/medical/SEND routes and external support contacts.
- ☐ Consult pupil and parent voice, including boarders, international pupils and pupils with SEND, and record how accessibility barriers are addressed.
- ☐ Obtain governance approval, publish the policy, archive the superseded version and schedule the first termly implementation review.

APPROVAL STATUS

Governance approval should not be recorded until every action is complete or has a named owner and completion date.

Appendix E - Implementation sign-off

Implementation control	Sign-off record
Reporting routes and accessibility	Owner: _____ Complete / due: _____
Central record and termly dashboard	Owner: _____ Complete / due: _____
Safeguarding and digital-evidence briefing	Owner: _____ Complete / due: _____
Curriculum and boarding induction	Owner: _____ Complete / due: _____
Supervision and out-of-hours escalation	Owner: _____ Complete / due: _____
Linked-policy alignment	Owner: _____ Complete / due: _____
Pupil and parent communication	Owner: _____ Complete / due: _____
Governance conditions closed	Confirmed by: _____ Date: _____

Reviewed against The National College model policy and current primary guidance. Earlscliffe-specific operational decisions remain the responsibility of the Headteacher and Governing Body.