



FELIXSTOWE
INTERNATIONAL COLLEGE
FRIENDSHIP THROUGH EDUCATION

Anti-Bullying Policy

Version Date:	February 2026
Signed:	Principal
Signed:	Chair of Governors
Review cycle:	1 year
Date of next review:	February 2027

Status and basis of this policy

This policy is the College's anti-bullying strategy for the purposes of paragraph 10 of the Schedule to the Education (Independent School Standards) Regulations 2014, which requires the proprietor to ensure that bullying at the school is prevented in so far as reasonably practicable by the drawing up and effective implementation of an effective anti-bullying strategy. It is also the College's policy on countering bullying, including cyberbullying and initiation/hazing type violence and rituals, required by the National Minimum Standards for Boarding Schools (May 2026) ('NMS'), in particular Standard 16 (preventing bullying) and Appendix A.

The policy is based on the following guidance and standards:

- DfE, 'Preventing and Tackling Bullying' (July 2017) and its supporting advice, including 'Cyberbullying: advice for headteachers and school staff'.
- DfE, 'Keeping Children Safe in Education' (September 2025), the statutory safeguarding guidance currently in force. Sexual violence and sexual harassment between children is now addressed within Part 5 of that guidance, which the College follows. The College is aware that KCSIE 2026 has been published for information and comes into force on 1 September 2026; this policy will be checked against it at that point.
- National Minimum Standards for Boarding Schools (DfE, May 2026), especially Standards 11–13 (boarders' induction, support, contact and views), 15 (promoting positive behaviour), 16 (preventing bullying) and 17 (promoting good relationships).
- DfE, 'Behaviour in Schools' (2024) and 'Searching, Screening and Confiscation' advice.
- Childnet, 'Cyberbullying: Understand, Prevent and Respond: Guidance for Schools'.

This policy applies to all pupils, including boarders, and to behaviour on and off the school site, online and offline, during term time and (for boarders) outside teaching hours. It is published on the College website and is available free of charge on request.

1) Policy objectives

- This policy outlines what Felixstowe International College will do to prevent and tackle all forms of bullying, in the classroom, around the school site, in the boarding houses and online.
- The policy has been adopted with the involvement of the whole school community, including boarders.
- Felixstowe International College is committed to developing an anti-bullying culture where the bullying of adults, children or young people is not tolerated in any form.
- Because the College is a boarding school, it recognises (in line with NMS 16.3) that boarders who are being bullied cannot escape their bullies for long periods of time in the way that day pupils can, because they do not go home as often. The College's prevention, supervision and response arrangements therefore extend across the whole boarding day and night, and staff treat any suggestion of bullying in boarding with particular urgency.

2) Links with other school policies and practices

This policy links with several school policies, practices and action plans, including:

- Behaviour policy (including sanctions, rewards and restraint)

- Complaints policy (which parents/carers should use if they consider a bullying concern has not been resolved; boarders also have their own accessible route to raise complaints about boarding provision under NMS Standard 14)
- Child protection and safeguarding policy
- Statement of boarding principles and practice, and boarding house handbooks
- Confidentiality policy
- Online safety and Acceptable Use Policies (AUP), including filtering and monitoring arrangements
- Curriculum policies (including PSHE and Relationships and Sex Education)
- SEND policy and Accessibility Plan
- Searching, screening and confiscation policy
- Staff code of conduct and staff behaviour policy

3) Links to legislation and standards

There are several pieces of legislation and regulatory standards which set out measures and actions for schools in response to bullying, as well as criminal and civil law. These may include (but are not limited to):

- The Education and Inspections Act 2006 and the Education Act 2011
- The Education (Independent School Standards) Regulations 2014, in particular paragraph 10 (anti-bullying strategy) and Part 3 (welfare, health and safety of pupils)
- The Children Act 1989 (section 87: welfare of children accommodated in boarding schools) and the Care Standards Act 2000, under which the National Minimum Standards for Boarding Schools are published
- The Children Act 2004
- The Equality Act 2010
- The Protection from Harassment Act 1997
- The Malicious Communications Act 1988 and the Communications Act 2003 (section 127)
- The Online Safety Act 2023
- The Public Order Act 1986
- The Education Act 1996 (section 550ZA: searching pupils and their possessions)

4) Responsibilities

It is the responsibility of:

- The Principal (the headteacher for the purposes of DfE guidance) to communicate this policy to the school community, to ensure that disciplinary measures are applied fairly, consistently and reasonably, and to ensure that a member of the senior leadership team has been identified to take overall responsibility for anti-bullying, day and boarding.
- The Designated Safeguarding Lead (DSL) to be informed of all bullying concerns with safeguarding implications, to consider in every case whether the bullying gives rise to a safeguarding concern about the child who is bullied or the child who is bullying (child-on-child abuse), and to refer to external agencies where a child may be at risk of significant harm.

- The Head of Boarding and boarding staff (including house staff on duty overnight) to implement this policy within the boarding houses, to remain vigilant to bullying between boarders during evenings, nights and weekends, and to ensure effective links between academic and residential staff (NMS 2.3) so that concerns arising in one setting are known in the other.
- The Advisory Board and the named Advisor for anti-bullying to take a lead role in monitoring and reviewing this policy, and, on behalf of the proprietor, to monitor the effectiveness of the leadership, management and delivery of boarding and welfare provision (NMS 2.1).
- All staff, including senior leadership, teaching and non-teaching staff, boarding staff and volunteers, to support, uphold and implement this policy. In line with NMS 16.2, all staff are trained to recognise bullying and know who to go to in order to ensure it is dealt with.
- Parents/carers, and the educational guardians of international boarders, to support their children and work in partnership with the school.
- Pupils, including boarders and any pupils holding positions of responsibility such as prefects, to abide by the policy. Any prefect system operates with adequate staff supervision, training and measures to counter possible abuses of the role (NMS Standard 21).

5) Definition of bullying

- Bullying can be defined as “behaviour by an individual or a group, repeated over time, that intentionally hurts another individual either physically or emotionally” (DfE, ‘Preventing and Tackling Bullying’, July 2017).
- Bullying can include name calling, taunting, mocking, making offensive comments; kicking; hitting; taking belongings; producing offensive graffiti; gossiping; excluding people from groups; and spreading hurtful and untruthful rumours.
- This includes the same unacceptable behaviours expressed online, sometimes called online bullying or cyberbullying. This can include: sending offensive, upsetting and inappropriate messages by phone, text, instant messenger, through gaming, websites, social media sites and apps; and sending offensive or degrading photos or videos.
- Generative artificial intelligence (AI): AI tools are now widespread and easy to access. The College recognises that AI has many uses to help pupils learn, but may also be used to bully others – for example in the form of ‘deepfakes’, where AI is used to create images, audio or video hoaxes that look real, or AI-generated messages, memes or fake accounts designed to humiliate or harass. The College will treat any use of AI to bully pupils under this policy and the behaviour policy, and where AI is used to create sexual imagery of a child this will be treated as a safeguarding matter and may be reported to the police.
- Initiation and hazing: in line with the NMS, this policy covers initiation/hazing type violence and rituals – any activity, however framed as ‘tradition’ or ‘banter’, expected of a pupil (particularly a new boarder) to join or remain part of a group, which humiliates, degrades, endangers or abuses them, regardless of the pupil’s apparent willingness to take part. Initiation ceremonies of this kind are not permitted anywhere in the College, including in the boarding houses.
- Bullying is recognised by the school as a form of child-on-child abuse (the term now used in Keeping Children Safe in Education, replacing ‘peer on peer abuse’). It can be emotionally abusive and can cause severe and adverse effects on children’s emotional development.
- Bullying is a subjective experience that can take many forms. Various national and international definitions of bullying exist and most have three things in common, reflecting

children and young people's (CYP's) experience of bullying and evidence from extensive research:

- o It is deliberately hurtful behaviour
- o It is usually repeated over time
- o There is an imbalance of power, which makes it hard for those being bullied to defend themselves.

6) Forms and types of bullying covered by this policy

Bullying behaviour across all types of bullying can present itself in a number of different forms. Children and young people can be bullied in ways that are:

- Physical – by being punched, pushed or hurt; made to give up money or belongings; having property, clothes or belongings damaged; being forced to do something they don't want to do, including through initiation or hazing rituals.
- Verbal – by being teased in a nasty way; called gay (whether or not it's true); insulted about their race, religion or culture; called names in other ways or having offensive comments directed at them.
- Indirect – by having nasty stories told about them; being left out, ignored or excluded from groups, including exclusion from social activities within a boarding house.
- Electronic/'cyberbullying' – via text message; via instant messenger services and social network sites; via email; via images or videos (including AI-generated or manipulated content) posted on the internet or spread via mobile phones; and within online games. Because boarders live on site and use devices during the boarding day, cyberbullying can follow a boarder into their house and room; boarding staff are therefore alert to it at all times.

Specific types of bullying: the school recognises that although anyone can be bullied for almost any reason or difference, some children and young people (CYP) may be more vulnerable to bullying than others. Research has identified various types of bullying experienced by particular vulnerable groups of CYP. These include:

- Bullying related to race, religion, nationality or culture
- Bullying related to special educational needs (SEN) or disabilities
- Bullying related to being gifted or talented
- Bullying related to appearance or health conditions
- Bullying related to sexual orientation (homophobic or biphobic bullying)
- Bullying of young carers or looked-after children or otherwise related to home circumstances
- Bullying of boarders who are new to the school or new to boarding, or related to nationality, first language or cultural difference – a particular consideration in an international boarding community such as ours
- Sexist, sexual or transphobic bullying (see Appendix A: Specific Types of Bullying)

The school recognises that bullying is a complex type of behaviour occurring between individuals and groups. Different roles within bullying situations can be identified and include:

- The ring-leader, who through their position of power can direct bullying activity
- Assistants/associates, who actively join in the bullying (sometimes because they are afraid of the ring-leader)

- Reinforcers, who give positive feedback to those who are bullying, perhaps by smiling or laughing
- Outsiders/bystanders, who stay back or stay silent and thereby appear to condone or collude with the bullying behaviour
- Defenders, who try to intervene to stop the bullying or comfort pupils who experience bullying.

Some CYP can adopt different roles simultaneously or at different times, e.g. a bullied child might be bullying another child at the same time, or a 'reinforcer' might become a 'defender' when the ring-leader is not around.

7) School ethos

- The Felixstowe International College community recognises that all forms of bullying, especially if left unaddressed, can have a devastating effect on individuals; it can create a barrier to learning and have serious consequences for mental wellbeing. For boarders, whose home during term time is the school, unaddressed bullying is particularly corrosive, and the College's philosophy of 'friendship through education' depends on every pupil feeling safe in lessons and in their boarding house.
- By effectively preventing and tackling bullying our school can help to create a safe and disciplined environment, where pupils are able to learn, live and fulfil their potential.

Our community:

- Monitors and reviews our anti-bullying policy and practice on a regular basis.
- Supports staff to promote positive relationships to help prevent bullying, and supports boarders to develop good relationships with fellow pupils and staff based on mutual trust and respect (NMS Standard 17).
- Recognises that some members of our community may be more vulnerable to bullying and its impact than others; this may include children with SEND and boarders far from home. Being aware of this helps us to develop effective strategies to prevent bullying from happening and provide appropriate support, if required.
- Will intervene by identifying and tackling bullying behaviour appropriately and promptly, wherever and whenever it occurs.
- Ensures our pupils are aware that bullying concerns will be dealt with sensitively and effectively; that everyone should feel safe to learn and to live in the boarding community; and that no pupil will be penalised for raising a concern or complaint in good faith (NMS 13.1 and 14.2).
- Requires all members of the community to work with the school to uphold the anti-bullying policy.
- Recognises the potential impact of bullying on the wider family of those affected, so will work in partnership with parents/carers (and educational guardians, where appointed) regarding all reported bullying concerns and will seek to keep them informed at all stages.
- Will deal promptly with grievances regarding the school's response to bullying in line with our complaints policy.
- Seeks to learn from good anti-bullying practice elsewhere, including in the boarding sector (e.g. Boarding Schools' Association guidance).
- Utilises support from the Local Authority and other relevant organisations when appropriate.

8) Recognising signs and symptoms

The school recognises that some CYP are more vulnerable to bullying than others and is sensitive to the changes of behaviour that may indicate that a child or young person is being bullied. CYP who are being bullied may demonstrate physical, emotional and behavioural problems. The following signs and behaviour could indicate other problems, but bullying will be considered as a possibility:

- Being frightened of walking to or from school, or of moving around the school or boarding house alone
- Losing self-confidence and self-esteem
- Being frightened to say what's wrong
- Developing unexplained cuts, bruises and other injuries
- Unwillingness to go to school or to return to the boarding house; development of school phobia and unusual patterns of non-attendance
- For boarders: reluctance to return to school after exeat or holidays, avoiding communal areas, mealtimes or activities, spending excessive time alone in their room, or repeated requests to change rooms or houses
- Failing to achieve potential in school work
- Becoming withdrawn, nervous and losing concentration
- Becoming isolated and disengaged from other CYP
- Developing changes in physical behaviour such as stammering and nervous tics
- Regularly having books or clothes destroyed
- Having possessions go 'missing' or 'lost', including packed lunch and money
- Starting to steal money (to pay the perpetrator)
- Becoming easily distressed, disruptive or aggressive
- Developing problems with eating and food
- Running away or going missing from the boarding house
- Developing sleep problems and having nightmares
- Developing suicidal thoughts or attempting suicide.

Where CYP are exhibiting extreme signs of distress and changes in behaviour, the school will liaise with parents/carers and, where appropriate, relevant health professionals and agencies, such as the school nurse, GP and Children and Young People's Mental Health Services (CYPMHS/CAMHS), with which the school engages under NMS 7.4. Boarding staff, who see boarders throughout the day and evening, are well placed to notice these signs and are trained to report them.

Recognising reasons why CYP may bully

The school recognises that CYP may bully for a variety of reasons. Recognising why CYP bully supports the school in identifying CYP who are at risk of engaging in this behaviour, enables early intervention, and helps in selecting the right responsive strategies and external support. In line with The Key's guidance, the school also considers whether the motivations behind bullying behaviour raise any safeguarding concerns for the pupil who bullies as well as the pupil who is bullied. Possible reasons why some CYP may engage in bullying include:

- Struggling to cope with a difficult personal situation, e.g. bereavement, changes in family circumstances, or homesickness and cultural adjustment for boarders
- Liking the feeling of power and using bullying behaviour to get their own way

- Having a temperament that may be aggressive, quick-tempered or jealous
- Having been abused or bullied in some way
- Feeling frustrated, insecure, inadequate or humiliated
- Finding it difficult to socialise and make friends
- Being overly self-orientated (possibly displaying good self-esteem) and finding it difficult to empathise with the needs of others
- Being unable to resist negative peer pressure
- Being under pressure to succeed at all costs.

9) How pupils, parents and staff can report bullying

In line with NMS 16.1, the College provides accessible and effective systems for children to report bullying, and makes sure pupils know what they are. A pupil, including a boarder, can report bullying (about themselves or someone else) through any of the following routes:

- To any member of staff – every boarder is able to contact any member of staff with personal, academic or welfare concerns, and all staff know what to do if a pupil approaches them with a concern (NMS 11.3).
- To their tutor, teacher, houseparent or any boarding staff member, including staff on duty in each boarding house overnight.
- To the Designated Safeguarding Lead or a deputy DSL.
- To the 'independent person' – the College identifies at least one person, independent of the staff and of those responsible for leadership and governance, whom pupils may contact directly about personal problems or concerns, including bullying (NMS 11.4). Boarders are told who this person is and how to contact them, and contact details are displayed in each boarding house.
- Anonymously or in writing, through the worry boxes in school and boarding houses or the pupil online reporting form.
- Through friends, parents/carers or educational guardians, who can contact any member of staff, the DSL or the Principal on a pupil's behalf.

Boarders are also provided, on induction and via displays in the boarding houses, with details of two or more child-specific external support services they can contact in case of problems or distress, such as Childline (0800 1111, www.childline.org.uk) and the Children's Commissioner's Help at Hand service (NMS 11.5).

No pupil will ever be penalised for reporting bullying or raising a concern in good faith, whether about another pupil, a member of staff or the school itself. Staff must pass every report of bullying to the DSL or a senior member of staff and must never promise a pupil complete confidentiality; information is shared on a need-to-know basis in line with the safeguarding and confidentiality policies.

10) Responding to bullying

The following steps may be taken when dealing with all incidents of bullying reported to the school:

- If bullying is suspected or reported, the incident will be dealt with immediately by the member of staff who has been approached or who witnessed the concern, and recorded.
- The school will provide appropriate support for the person being bullied – making sure they are not at risk of immediate harm – and will involve them in any decision-making, as

appropriate. For a boarder this includes immediate practical steps within the house where needed (for example, adjusting rooming or supervision arrangements) so that they feel safe overnight.

- The Principal and/or Designated Safeguarding Lead (DSL) will interview all parties involved. Where an incident involves boarders, the Head of Boarding and relevant house staff will be involved.
- The DSL will be informed of all bullying issues where there are safeguarding concerns, and will consider whether the incident constitutes child-on-child abuse under Keeping Children Safe in Education.
- The school will speak with and inform other staff members, where appropriate. Effective links between academic and residential staff ensure that day and boarding staff share relevant information about pupils involved.
- The school will ensure parents/carers (and educational guardians of international boarders, where appropriate) are kept informed about the concern and action taken, in line with the child protection and confidentiality policies.
- The school's response will be proportionate to the seriousness, persistence and impact of the bullying. A single unkind incident may be resolved through restorative conversation and monitoring; serious, persistent or prejudice-based bullying will attract formal sanctions. Sanctions, as identified within the school behaviour policy, and support will be implemented in consultation with all parties concerned.
- When deciding on sanctions and support, the school will take into account any special educational needs or disabilities of the pupils involved (both the pupil who has been bullied and the pupil who has bullied), making reasonable adjustments where appropriate while maintaining clear expectations of behaviour.
- If necessary, other agencies may be consulted or involved: the police, if a criminal offence has been committed; or other local services, including early help or children's social care, if a child is felt to be at risk of significant harm.
- Where bullying of or by pupils takes place off the school site or outside of normal school hours (including cyberbullying), the school will ensure that the concern is fully investigated. If required, the DSL will collaborate with other schools. Appropriate action will be taken, including providing support and implementing sanctions in school in accordance with this policy and the school's behaviour policy. For boarders, there are no 'out of hours': the school is responsible for boarders' welfare throughout the boarding day, including evenings, nights and weekends.
- A clear and precise account of bullying incidents will be recorded by the school using the Bullying Incident Report Form (Appendix B) and in accordance with existing procedures, including appropriate details regarding decisions and actions taken. Records identify whether an incident involves boarders or boarding provision, and the school keeps records under review to identify emerging patterns (by pupil, group, house, location, type of bullying and time of year) so that preventative action can be targeted.

Cyberbullying

When responding to cyberbullying concerns, the school will:

- Act as soon as an incident has been reported or identified.
- Provide appropriate support for the person who has been cyberbullied and work with the person who has carried out the bullying to ensure that it does not happen again.

- Encourage the person being bullied to keep any evidence (screenshots) of the bullying activity to assist any investigation.
- Take all available steps where possible to identify the person responsible. This may include: looking at use of the school systems; identifying and interviewing possible witnesses; and contacting the service provider and the police, if necessary.
- Work with the individuals and online service providers to prevent the incident from spreading and assist in removing offensive or upsetting material from circulation. This may include: supporting reports to a service provider to remove content if those involved cannot be identified or refuse to or are unable to delete content; confiscating and searching pupils' electronic devices, such as mobile phones, in accordance with the law (section 550ZA of the Education Act 1996), DfE guidance and the school's searching, screening and confiscation policy; and requesting the deletion of locally-held content and content posted online if it contravenes school behaviour policies.
- Treat AI-generated or manipulated content (including deepfakes) used to bully, humiliate or harass a pupil in the same way as any other cyberbullying, applying the behaviour policy; where such content is sexual in nature it will be treated under the safeguarding policy and may be reported to the police and/or the Internet Watch Foundation.
- Ensure that sanctions are applied to the person responsible for the cyberbullying; the school will take steps to change the attitude and behaviour of the bully, as well as ensuring access to any additional help that they may need.
- Inform the police if a criminal offence has been committed.
- Provide information to staff and pupils regarding steps they can take to protect themselves online. This may include: advising those targeted not to retaliate or reply; providing advice on blocking or removing people from contact lists; and helping those involved to think carefully about what private information they may have in the public domain.

In line with NMS 12.1 and the online safety policy, the school operates proportionate systems to monitor and control boarders' use of electronic communications in order to detect abuse, bullying or unsafe practice, while respecting boarders' ability to contact their parents/carers in private. The school's child protection policy also addresses harmful online content on boarders' own devices, including content accessed via mobile data that bypasses the school's filtering and monitoring systems.

11) Supporting those involved

Supporting pupils

Pupils who have been bullied will be supported by:

- Reassuring the pupil and providing continuous pastoral support, including within the boarding house through houseparents and tutors.
- Offering an immediate opportunity to discuss the experience with their teacher, the designated safeguarding lead, or a member of staff of their choice.
- Being advised to keep a record of the bullying as evidence and discussing how to respond to concerns and build resilience as appropriate.
- Working towards restoring self-esteem and confidence.
- Providing ongoing support; this may include working and speaking with staff, offering formal counselling, engaging with parents/carers and, for international boarders, educational guardians.

- Where necessary, working with the wider community and local/national organisations to provide further or specialist advice and guidance; this could include support through Early Help or the Children's Social Work Service, or support through Children and Young People's Mental Health Services (CYPMHS), to which the school facilitates access for boarders under NMS 7.4–7.5.

Pupils who have perpetrated bullying will be helped by:

- Discussing what happened, establishing the concern and the need to change.
- Informing parents/carers (and educational guardians, where appropriate) to help change the attitude and behaviour of the child.
- Providing appropriate education and support regarding their behaviour or actions, and considering whether the behaviour itself indicates a safeguarding need in the pupil who has bullied.
- If online, requesting that content be removed and reporting accounts/content to the service provider.
- Sanctioning in line with the school behaviour/discipline policy; this may include official warnings, detentions, removal of privileges (including online access where there are cyberbullying concerns; and, for boarders, proportionate measures within the boarding house such as changed rooming or supervised free time), and fixed-term or permanent exclusion. Sanctions will take account of any SEND and of the age and understanding of the pupil.
- Where necessary, working with the wider community and local/national organisations to provide further or specialist advice and guidance; this may include involvement from the police or referrals to Early Help, the Children's Social Work Service, or CYPMHS.

Supporting adults

Our school takes measures to prevent and tackle bullying among pupils; however, it is equally important to recognise that bullying of adults, including staff and parents, whether by pupils, parents or other staff members, is unacceptable.

Adults who have been bullied or affected will be supported by:

- Offering an immediate opportunity to discuss the concern with the designated safeguarding lead, a senior member of staff and/or the Principal.
- Advising them to keep a record of the bullying as evidence and discussing how to respond to concerns and build resilience, as appropriate.
- Where the bullying takes place off the school site or outside of normal school hours (including online), the school will still investigate the concern and ensure that appropriate action is taken in accordance with the school's behaviour and discipline policies.
- Reporting offensive or upsetting content and/or accounts to the service provider, where the bullying has occurred online.
- Reassuring and offering appropriate support.
- Working with the wider community and local/national organisations to provide further or specialist advice and guidance.

Adults who have perpetrated bullying will be helped by:

- Discussing what happened with a senior member of staff and/or the Principal to establish the concern.

- Establishing whether a legitimate grievance or concern has been raised, and signposting to the school's official complaints procedures.
- If online, requesting that content be removed.
- Instigating disciplinary, civil or legal action as appropriate or required.

12) Preventing bullying

Environment

The whole school community will:

- Create and support an inclusive environment which promotes a culture of mutual respect, consideration and care for others, upheld by all, in classrooms and boarding houses alike. In line with NMS Standard 3, boarders are not discriminated against, and their different cultural and linguistic backgrounds, special educational needs and abilities are taken into account so that care is sensitive to different needs.
- Recognise that bullying can be perpetrated or experienced by any member of the community, including adults and children (child-on-child abuse).
- Recognise the potential for children with SEN and disabilities to be disproportionately impacted by bullying and implement additional pastoral support as required.
- Openly discuss differences between people that could motivate bullying, such as: children with different family situations (for example looked-after children or those with caring responsibilities), religion, ethnicity, nationality, first language, disability, gender, sexuality or appearance-related difference.
- Challenge practice and language (including 'banter' and so-called 'initiation traditions') which does not uphold the school values of tolerance, non-discrimination and respect towards others.
- Encourage the positive and responsible use of technology, especially mobile phones, AI tools and social media.
- Work with staff, the wider community and outside agencies to prevent and tackle concerns, including all forms of prejudice-driven bullying.
- Actively create "safe spaces" for vulnerable children and young people, including safe areas in the boarding houses where boarders can be alone if they wish (NMS 18.3).
- Ensure that supervision of boarders outside teaching time – including evenings, nights, weekends and unstructured free time, when bullying is more likely to occur – is sufficient in number, training and experience for the age, number and needs of boarders (NMS 20.3), and that staff know the whereabouts of boarders in their charge (NMS 20.5).
- Celebrate success and achievements to promote and build a positive school ethos.

Policy and support

The whole school community will:

- Provide a range of approaches for pupils, staff and parents/carers to access support and report concerns, as set out in section 9.
- Review our records and current trends (including social media trends, local factors and seasonal patterns such as the start of the school year, arrival of new boarders, exam periods and darker evenings) to identify ways pupils have experienced or could experience bullying, and take specific, proactive steps to mitigate and limit those risks.

- Regularly update and evaluate our practice to take account of developments in technology (including generative AI) and provide up-to-date advice and education to all members of the community regarding positive online behaviour.
- Take appropriate, proportionate and reasonable action, in line with existing school policies, for any bullying brought to the school's attention which involves or affects pupils, even when they are not on school premises; for example, when using school transport, on trips, in school-arranged lodgings or online.
- Implement appropriate disciplinary sanctions: the consequences of bullying will reflect the seriousness of the incident, so that others see that bullying is unacceptable.
- Use a variety of techniques to resolve the issues between those who bully and those who have been bullied, including restorative approaches where appropriate.

Education and training

The school community will:

- Train all staff – including teaching staff, support staff (e.g. administration and site support staff), pastoral staff and boarding staff – to identify all forms of bullying and take appropriate action, following the school's policy and procedures, including recording and reporting incidents. In line with NMS 16.2, all staff are trained to recognise bullying and know who to go to for help in dealing with it. Anti-bullying training forms part of the induction of all new staff, and boarding staff receive induction and ongoing training in boarding practice (NMS 20.1).
- Ensure the induction of new boarders (NMS 11.1) includes clear, age-appropriate information about this policy, how to report bullying, the independent person and external helplines.
- Consider a range of opportunities and approaches for addressing bullying throughout the curriculum and other activities, such as: PSHE and Relationships (and Sex) Education, displays, assemblies, peer support, the school/student council and boarders' meetings.
- Collaborate with other local educational settings as appropriate, and during key times of the year, for example during transition.
- Ensure anti-bullying has a high profile throughout the year, reinforced through key opportunities such as Anti-Bullying Week.
- Provide systematic opportunities to develop pupils' social and emotional skills, including building their resilience and self-esteem, and give children the vocabulary and opportunity to openly discuss bullying.

13) Involvement of pupils

We will:

- Involve pupils, including boarders, in policy writing and decision making, to ensure that they understand the school's approach and are clear about the part they play in preventing bullying.
- Regularly canvass children and young people's views on the extent and nature of bullying, including through an annual pupil survey and through the clear and easily accessible systems for boarders to provide views and raise concerns required by NMS 13.1. Survey results and boarders' views are reported to the senior leadership team and the Advisory Board to reflect and act upon, and pupils are given feedback on what has been done in response.

- Ensure that all pupils know how to express worries and anxieties about bullying, and that boarders know they will not be penalised for raising a concern in good faith.
- Ensure that all pupils are aware of the range of sanctions which may be applied against those engaging in bullying.
- Involve pupils in anti-bullying campaigns in school and embed messages in the wider school curriculum.
- Utilise pupil voice in providing pupil-led education and support.
- Publicise the details of internal support, the independent person, and external helplines and websites, including in every boarding house.
- Offer support to pupils who have been bullied and to those who are bullying, to address the problems they have.

14) Involvement and liaison with parents, carers and educational guardians

We will:

- Take steps to involve parents and carers in developing policies and procedures, to ensure they are aware that the school does not tolerate any form of bullying.
- Make sure that key information about bullying (including policies and named points of contact) is available to parents/carers in a variety of formats, including via the school website. As many of our boarders' parents live overseas, key information is written in clear, accessible English and staff can arrange support for parents for whom English is not their first language.
- Ensure all parents/carers know who to contact if they are worried about bullying and where to access independent advice.
- Keep the educational guardians of international boarders appropriately informed of concerns and actions, in line with the school's guardianship arrangements (NMS Standard 22) and with parental agreement, recognising that guardians often act as the first point of contact in the UK.
- Work with all parents/carers and the local community to address issues beyond the school gates that give rise to bullying.
- Ensure that parents/carers work with the school to role-model positive behaviour for pupils, both on and offline.
- Ensure all parents/carers know about our complaints procedure and how to use it effectively to raise concerns in an appropriate manner, including where they consider that a bullying concern has not been resolved. The complaints policy is available on the school website. Boarders also have their own accessible route to raise complaints about boarding provision, and are not penalised for complaints raised in good faith (NMS 14.2).

15) Monitoring and review: putting policy into practice

- The school will ensure that it regularly monitors and evaluates mechanisms to confirm that the policy is being consistently applied across the day school and boarding provision.
- Bullying records (Appendix B) are reviewed at least termly by the DSL and Head of Boarding to identify emerging patterns – by individual, group, boarding house, location, type of bullying (including prejudice-based and online bullying) and time of year – and any issues identified are incorporated into the school's action planning.
- The Principal will be informed of bullying concerns, as appropriate.

- The named Advisor for anti-bullying will report on a regular basis to the Advisory Board on incidents of bullying, including outcomes, supporting the Board's duty to monitor the effectiveness of boarding and welfare provision (NMS 2.1).
- This policy is reviewed annually, and sooner if legislation, statutory guidance (including KCSIE 2026, in force from 1 September 2026) or lessons from practice require it.

16) Useful links and supporting organisations

- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
- Childline: www.childline.org.uk (0800 1111)
- Children's Commissioner – Help at Hand: www.childrenscommissioner.gov.uk/help-at-hand
- Family Lives: www.familylives.org.uk
- Kidscape: www.kidscape.org.uk
- MindEd: www.minded.org.uk
- NSPCC: www.nspcc.org.uk
- The BIG Award: www.bullyinginterventiongroup.co.uk
- PSHE Association: www.pshe-association.org.uk
- Restorative Justice Council: www.restorativejustice.org.uk
- The Diana Award: www.diana-award.org.uk
- Victim Support: www.victimsupport.org.uk
- Young Minds: www.youngminds.org.uk
- Boarding Schools' Association: www.boarding.org.uk

SEND

- Changing Faces: www.changingfaces.org.uk
- Mencap: www.mencap.org.uk
- Anti-Bullying Alliance – SEND resources: www.anti-bullyingalliance.org.uk
- DfE SEND code of practice: www.gov.uk/government/publications/send-code-of-practice-0-to-25

Cyberbullying and online safety

- Childnet: www.childnet.com
- Internet Watch Foundation: www.iwf.org.uk
- Think U Know (CEOP Education): www.thinkuknow.co.uk
- UK Safer Internet Centre: www.saferinternet.org.uk
- UK Council for Internet Safety (UKCIS): www.gov.uk/government/organisations/uk-council-for-internet-safety
- DfE 'Cyberbullying: advice for headteachers and school staff' and 'Advice for parents and carers on cyberbullying': www.gov.uk/government/publications/preventing-and-tackling-bullying

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 UK: www.stophateuk.org
- Tell MAMA: www.tellmamauk.org
- Educate Against Hate: www.educateagainsthate.com
- Show Racism the Red Card: www.theredcard.org

LGBT

- Barnardo's: www.barnardos.org.uk
- EACH: www.each.education
- The Proud Trust: www.theproudtrust.org
- Schools Out: www.schools-out.org.uk
- Stonewall: www.stonewall.org.uk

Sexual harassment and sexual bullying

- End Violence Against Women coalition (EVAW): www.endviolenceagainstwomen.org.uk
- Anti-Bullying Alliance – preventing and responding to sexual bullying: www.anti-bullyingalliance.org.uk
- Keeping Children Safe in Education, Part 5 (child-on-child sexual violence and sexual harassment): www.gov.uk/government/publications/keeping-children-safe-in-education--2

Additional links can be found in 'Preventing and Tackling Bullying' (July 2017):
www.gov.uk/government/publications/preventing-and-tackling-bullying

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Appendix A: Specific types of bullying

Bullying related to race, religion, nationality or culture

Racist or faith-based bullying is bullying based on a person's ethnic background, colour, religion, nationality or cultural heritage. Some surveys and focus groups have found that a high proportion of bullied pupils have experienced racist or faith-based bullying, and political and social issues can be a factor in rises in this type of bullying and harassment. Research supports the suggestion that where Black and minority ethnic children experience bullying, it is more likely to be severe bullying; bullying incidents can also be a subset of the wider racist hostility which children of different ethnicities and faiths, and Gypsy, Roma and Traveller children, can experience. When racist or faith-based bullying takes place, the characteristics singled out apply not only to the individual child but also to their family and, more broadly, their ethnic or faith community as a whole, which heightens the negative impact on a child's sense of identity, self-worth and self-esteem. In an international school community such as ours, staff are also alert to bullying related to nationality or first language. All incidents identified as potentially prejudice-related must be recorded, reported and investigated as such. The definition of a prejudice-related incident derives from the Stephen Lawrence Inquiry Report (1999) definition of a racist incident: any incident which is perceived to be prejudice-related by the victim or any other person. In addition to prejudice-related bullying linked with one or more of the protected characteristics, children can be made to feel worthless, excluded or marginalised because of other prejudices relating to their home life, for example issues of care, parental occupation, poverty and social class.

Bullying related to gender (sexist and sexual bullying)

Sexist and sexual bullying affects all genders. Sexist bullying is based on sexist attitudes that, when expressed, demean, intimidate or harm another person because of their sex or gender. Gender stereotyping can also have a negative impact on children and young people in that it can limit their aspirations and make them feel they should not or cannot do certain things. Sexual bullying may be characterised by name calling, comments and overt 'looks' about appearance, attractiveness and emerging puberty. In addition, uninvited touching, innuendos and propositions, pornographic imagery or graffiti may be used. Sexual violence and sexual harassment between children is addressed in Part 5 of Keeping Children Safe in Education and in the school's child protection and safeguarding policy, which staff follow whenever behaviour crosses from bullying into sexual harassment or violence.

Bullying related to gender identity (transphobic bullying)

Children and young people who do not conform to gender stereotypes, or who identify as transgender or are questioning their gender, can become targets of transphobic bullying. Gender identity is often confused with sexual identity, so children who do not conform to their perceived gender can also be subjected to homophobic and biphobic bullying. For this reason, homophobic, biphobic and transphobic bullying are commonly linked together as 'HBT' bullying.

Bullying related to sexual identity or orientation

Homophobic and biphobic bullying involves the targeting of individuals on the basis of their perceived or actual sexual orientation. Evidence suggests that children and young people who are gay, lesbian or bisexual (or perceived to be) face a higher risk of victimisation than their peers, and that this form of bullying is the least likely to be self-reported, since disclosure carries risks not associated with other forms of bullying: the young person may not want to report bullying if it

means 'coming out' to teachers and parents before they are ready. Homophobic and biphobic bullying includes all forms of bullying but in particular can include: verbal abuse, including the widespread use of the term 'gay' in a negative context and spreading rumours that cause a person's perceived sexual orientation to be ridiculed, questioned or insulted; physical abuse, including hitting, punching, kicking, sexual assault and threatening behaviour; and cyberbullying, using online spaces to spread rumours about someone or exclude them.

Bullying related to special educational needs and disabilities (SEND)

Research shows that children and young people with SEN and disabilities are more at risk of bullying than their peers. Children and young people with SEND, whether in mainstream or special schools, do not always have the levels of social confidence and competence and the robust friendship bonds that can protect against bullying. Where children with SEND are themselves found to be bullying, in most cases (except those related to specific conditions) the school will expect the same standards of behaviour as apply to the rest of the school community, having made the reasonable adjustments necessary under the Equality Act 2010.

Bullying related to gifted and talented children and young people

Children and young people who are gifted and talented can be vulnerable to bullying. Their achievements, different interests and advanced abilities can set them apart from their peers, lead to a sense of not 'fitting in' and feelings of isolation, and cause feelings of resentment and jealousy among their peers which may make them targets for bullying behaviour.

Bullying related to appearance or health conditions

Those with health or visible medical conditions, such as eczema, may be more likely than their peers to become targets for bullying behaviour. Perceived physical limitations, such as size and weight, and other body image issues can result in bullying, and obvious signs of affluence (or lack of it) can also be exploited.

Bullying of young carers, looked-after children or otherwise linked to home circumstances

Children and young people may be made vulnerable to bullying by the fact that they provide care to someone in their family with an illness, disability, mental health or substance misuse problem. Young carers may be taking on practical and emotional caring responsibilities that would normally be expected of an adult, and many feel bullied or isolated. Children in care may also be vulnerable to bullying for a variety of reasons, such as not living with their birth parents or having fallen behind in their studies. Some children are heavily influenced by communities or homes where bullying and abuse may be common; some bullying at school may arise from trauma or instability at home related to domestic violence, bereavement, or the experience of being part of a refugee family. Siblings of vulnerable children may themselves be the subject of bullying by association.

Bullying within boarding, including initiation and hazing

Boarders live together, and the informal hierarchies that can develop in a residential community – by age, year group, length of time at the school, nationality or language group – can be misused. Bullying in boarding can include deliberate exclusion from house social life, misuse of shared spaces or possessions, night-time intimidation, and so-called initiation or hazing rituals imposed on new boarders. The school does not permit initiation ceremonies which humiliate, degrade, endanger or abuse pupils, regardless of consent or 'tradition', and treats them as bullying and, where appropriate, as a safeguarding matter. Because boarders cannot go home each evening, staff act quickly on any concern so that no boarder has to live alongside unresolved bullying (NMS 16.3).

Appendix B: Bullying Incident Report Form

SECTION A: ALLEGED BULLYING INCIDENT			
Target name(s)		Age / Year group	
Ethnicity / Home language		Gender	
SEN stage		Boarder? (Y/N) and boarding house	
Looked-after child (Y/N)		Young carer (Y/N)	
Member of staff to whom the incident was reported		Date and time of incident	
Location of incident (state if in boarding accommodation or online)		Alleged perpetrator(s): name(s), age, year group, boarder? (Y/N)	
Nature of incident, including details of any injury or damage to property, etc.			
Form (circle any that apply): Physical / Verbal / Indirect / Cyberbullying (including AI-generated content) / Initiation or hazing			
Type (circle any that apply): Race/religion/nationality/culture / Sexual/sexist/transphobic / Homophobic or biphobic / SEN/disability / Home circumstances / Gifted/talented / Health conditions / Boarding-related / Other			
Parents/carers of alleged target(s) informed: date and time		Educational guardian informed (if applicable): date and time	
SECTION B: ACCOUNTS OF THOSE INVOLVED			
Alleged perpetrator(s)' account of the incident (name(s), age, year group)			
Bystanders'/witnesses' accounts of the incident (name(s), age, year group)			
Parents/carers of alleged perpetrator(s) informed: date and time		DSL informed: date and time	
SECTION C: ACTION TAKEN			
Details of immediate action taken (including any support put in place and, for boarders, any adjustments within the boarding house)			

Date		Signature	
Monitoring of action taken and details of follow-up and longer-term action taken (including review for patterns)			
Date		Signature	

Completed forms are passed to the DSL, filed in accordance with the school's record-keeping procedures, and reviewed termly to identify patterns. Where an incident involves boarders it is also recorded as relating to boarding provision, in line with the National Minimum Standards.