Prevention of Bullying Policy

Document control

Policy title	Prevention of Bullying Policy
Category	Safeguarding and Pastoral — Whole School (including EYFS)
Statutory status	Required. The Education (Independent School Standards) Regulations 2014 (as amended) require independent schools to have and implement an effective anti-bullying strategy.
Policy owner / lead	Deputy Head — Pastoral and Wellbeing
Senior leader responsible	Deputy Head — Pastoral and Wellbeing
Safeguarding lead consulted	Director of Safeguarding (Designated Safeguarding Lead)
Effective date	1 September 2026
Review cycle	Annual
Next review	September 2027
Version	V1.6
Applies to	The whole School, including the EYFS setting, the Prep School, the Senior School and the Sixth Form; all pupils, staff, governors, volunteers, visitors and contractors, whether on or off the School site.

Policy summary

Cokethorpe is a community built on respect. We want every member of the School — pupils, staff and parents — to feel safe, valued and able to be themselves. This policy explains what bullying is, including online bullying and bullying related to a protected characteristic, what we do to prevent it, how pupils, parents and staff report it, how we respond, support those involved and record and monitor incidents, and how bullying connects to safeguarding. It applies across the whole School, including the EYFS setting, and to conduct both on and off site.

Contents

1. Purpose and values 3
2. Scope and application 3
3. What we mean by bullying 3
4. Roles and responsibilities 4
5. Preventing bullying 5
7. How the School responds 6
8. Action to be taken 7
9. Professional conduct and the example we set 9
10. Recording, monitoring and review 10
11. Related School policies and procedures 10
12. Legislation, regulation and guidance 10

1. Purpose and values

This policy explains why preventing bullying matters, what we are seeking to achieve, and what members of our community need to do to achieve it.

Bullying, in any form, is incompatible with that ambition and with the School's expectations, grounded in the values of respect and integrity, which ask everyone to be courteous, considerate, open and respectful in their dealings with others.

Bullying is always an abuse of power. It is unacceptable whether it happens on or off the School site, in person or online, and whether it is directed at a child or an adult. Where bullying may amount to child-on-child abuse, it will be managed under the School's Safeguarding and Child Protection Policy and Procedures.

What we are seeking to achieve

- An environment in which bullying is far less likely to take root in the first place.
- The protection of all pupils and staff from all forms of bullying, including online.
- A culture of open communication, good listening, tolerance and kindness.
- A reasonable, proportionate and consistent response to any behaviour that may constitute bullying.
- Pupils, parents and staff who understand the School's expectations, this policy and how to report a concern.

2. Scope and application

This policy applies across the whole School, including the EYFS setting, and to conduct both on and off the School premises, including online conduct, where it affects the safety or wellbeing of a member of the School community.

Every member of Cokethorpe:

- has the right to learn, work and take part in School life without the threat or experience of bullying;
- is expected to understand and support the School's stance against bullying; and
- is expected to know how to report bullying and to speak out if they see it.

3. What we mean by bullying

We define bullying as behaviour which the recipient finds unwanted, hurtful, embarrassing, frightening, dominating, threatening or a cause for anxiety, and which is typically repeated over time. Bullying is often motivated by prejudice or by perceived differences. It includes, but is not limited to, bullying related to the protected characteristics under the Equality Act 2010 — for example racial, religious or cultural bullying; homophobic, biphobic or transphobic bullying; sexist and sexual bullying; and bullying of pupils with special educational needs or disabilities — as well as cyberbullying and the taking of another person's property.

We recognise that bullying is not only something that happens between children. It may be inflicted or suffered by an adult, and adults have a particular responsibility to model respectful behaviour.

Forms of bullying

Bullying commonly takes one or more of the following forms, which frequently overlap:

- **Physical** — for example jostling, hitting, interfering with, damaging, taking or extorting property, sexual assault, or confining or humiliating another person.
- **Verbal or psychological** — for example insults, offensive nicknames, sexual, homophobic or racial harassment, threats, intimidation, or any pattern of behaviour that isolates or distresses someone.
- **Online (cyberbullying)** — for example posting abusive or demeaning content, or the misuse of images or messaging (including "sexting") to demean, harass or exclude. Under the Malicious Communications Act 1988 it is an offence to send an electronic communication intended to cause distress or anxiety, or that is indecent, grossly offensive, threatening or knowingly false. Please also refer to the School's Social Media Policy and Mobile Phone Policy.

Where bullying is online, the School's online-safety arrangements, including its filtering and monitoring systems, support prevention and early identification. In line with Keeping Children Safe in Education 2026, the effectiveness of these systems is reviewed regularly.

Bullying as child-on-child abuse

We recognise that bullying between pupils is a form of child-on-child abuse. Where an allegation of bullying raises a safeguarding concern, it will be managed under the Safeguarding and Child Protection Policy and Procedures and in line with Keeping Children Safe in Education 2026, as well as under this policy.

Child-on-child abuse can take many forms. In line with Keeping Children Safe in Education 2026, these include, among others, the consensual and non-consensual sharing of self-generated intimate images and/or videos, including those generated using artificial intelligence (for example, "deepfakes"); upskirting, which is a criminal offence; and sexual harassment, which may be online or offline. We also recognise that misogyny and other prejudice can drive harmful sexual behaviour. Where such behaviour occurs, it is addressed as a safeguarding matter and not dismissed as "banter" or part of growing up.

Recognising the signs of bullying

A pupil may indicate through signs or behaviour that they are being bullied, even if they do not say so. Adults should be alert to the possibility of bullying and investigate where a pupil, for example:

- is frightened of walking to or from School, or changes their usual route;
- does not want to travel on the School bus or asks to be driven to School;
- is unwilling to go to School, or begins to truant;
- becomes withdrawn, anxious, or lacking in confidence;
- starts stammering, or shows a marked change in mood or behaviour;
- attempts or threatens self-harm, or talks about running away;
- has unexplained cuts or bruises, or comes home with clothing or belongings damaged or missing;
- has possessions that go "missing", or asks for money or starts stealing (to pay a bully);
- has dinner or other money continually "lost", or stops eating;
- is nervous or jumpy when a message is received online;
- is unwilling to use the internet or mobile devices, or is secretive about online activity;
- has a sudden drop in the standard of their work, or becomes disruptive or aggressive.

These signs may indicate other problems, but bullying should always be considered a possibility and investigated sensitively.

4. Roles and responsibilities

Preventing bullying is a shared responsibility. The following roles have specific parts to play:

Role	Responsibility
Governors	Provide strategic oversight and receive regular reports on bullying, including patterns and trends. The Safeguarding Governor is kept informed of significant matters.
The Head	Holds overall responsibility for pupil welfare and behaviour, and keeps the Safeguarding Governor informed of developments in serious cases.
Deputy Head — Pastoral and Wellbeing (policy owner)	Maintains this policy, oversees its implementation, holds the behaviour log and ensures staff are trained and pupils are informed.
Director of Safeguarding (Designated Safeguarding Lead)	Leads the response where bullying may involve a safeguarding or child-on-child abuse concern, and coordinates action with pastoral staff.
Heads of Year and the Head of Prep School	Manage day-to-day pastoral responses, support those affected and work with the DSL as required.
Tutors and all staff	Model respectful behaviour, remain alert to signs of bullying, respond to concerns and report them promptly.
Pupils and prefects	Treat others with kindness and respect, speak out about bullying, and support one another.
Parents	Work in partnership with the School, sharing concerns promptly through their child's tutor or Head of Year.

5. Preventing bullying

We seek to prevent bullying by building a culture in which it is unlikely to flourish and quickly challenged where it does. All staff are familiar with this policy and its procedures, and new staff are introduced to it through induction. Staff training, including INSET, raises awareness of bullying and of ways to reduce the risk of it.

Pupils learn about bullying and how to seek help through Head's, House and Prep School assemblies, tutor discussions, drama and the LIF-Ed and AOB programmes, and through engagement with external agencies. Staff are made aware of the times and places where bullying is most likely to occur, and it is the responsibility of all staff and prefects to watch for signs of distress in any pupil who may feel unable to report a problem.

Where appropriate, the School draws on specialist skills to understand the needs of pupils, including those with special educational needs or disabilities and those who are lesbian, gay, bisexual, transgender, queer or questioning (LGBTQ+).

Working with pupils

We help pupils to understand what bullying is, why it is harmful and how to seek help, and we support them to develop the confidence and resilience to speak out. Pupils are taught about respectful relationships, difference and diversity, and online safety through the PSHE, LIF-Ed and AOB programmes, assemblies and the wider pastoral system. Pupils are encouraged to support one another and to report concerns about themselves or others.

Working with staff

All staff are alert to signs of bullying and know how to respond. Staff receive training on this policy and its procedures, on child-on-child abuse and on the particular needs of pupils who may be more vulnerable to bullying. Staff are made aware of the times and places where bullying is most likely to occur, and supervise accordingly.

Working with parents

We work in partnership with parents. Parents are encouraged to watch for signs of distress, to take an active interest in their child's School and online life, and to contact the School promptly if they believe their child, or another pupil, is being bullied or is bullying others. Parents are asked to discourage their child from responding to bullying with retaliation.

6. Reporting a concern

Bullying can only be stopped if information is shared. Any pupil who is being bullied, or who sees another pupil being bullied, is encouraged to speak to any member of staff or other trusted adult. People who can help include:

- The Head
- The Deputy Head — Pastoral and Wellbeing
- The Director of Safeguarding (Designated Safeguarding Lead)
- The Safeguarding Governor
- The Head of Prep School
- A friend
- A responsible older pupil (School or House prefect)
- Parents
- A Head of Year
- A tutor
- Any member of staff or trusted adult
- The School Nurse
- The School Counsellor
- Childline (0800 1111)

Parents are asked to tell the School if they believe bullying is taking place, whether to their own child or another, through the child's tutor or Head of Year. In every case, pupils, parents and staff can expect to be taken seriously and for the information they give to be handled as confidentially as possible, consistent with the School's safeguarding responsibilities.

7. How the School responds

The following procedures apply to all allegations of bullying, whether the person responsible is a pupil or a member of staff.

Complaint by an alleged victim

A member of staff or a prefect to whom a complaint is made must:

- write down the details immediately — during the conversation, or straight afterwards if recording at the time would cause distress — using the complainant's own words wherever possible;
- give no promise of confidentiality, but make clear that the complainant will be told before information is passed to anyone else;
- reassure the complainant that no harm will come from making the allegation and that it will be taken seriously; and

- report the matter at once to the Designated Safeguarding Lead or to the Head of Prep School.

Allegation by a third party

A member of staff or a prefect who receives such an allegation must:

- note carefully the behaviour of the person making the allegation;
- record as much detail as possible in writing, using the actual words used wherever possible;
- give no promise of confidentiality, but reassure the person that their identity will not be disclosed without their permission; and
- report the matter to the DSL, who will contact the Head of Year or Head of Prep School of the alleged victim.

Anonymous allegation

A member of staff or a prefect who receives an anonymous allegation must record the words used as fully as possible, retain any written note or paper, and refer the matter to the DSL in all cases.

Suspicion of bullying

A member of staff or a prefect whose suspicion is aroused must write down what they have observed or heard and communicate the suspicion to the DSL.

8. Action to be taken

Once bullying has been established, the action to be taken is decided in consultation between the DSL, the Head of Prep School or the relevant Head of Year, and any other staff whose input is helpful — usually including tutors, and sometimes the Head. The following general principles normally apply:

- The pupil who has been bullied is supported and helped to cope with the situation.
- That pupil is seen at regular intervals by an assigned member of staff (or more than one).
- The pupil who has been bullied is never blamed, but is given help to build confidence and resilience.
- Parents of the pupil who has been bullied may be involved at an early stage.
- The pupil or pupils responsible for bullying are spoken to and the facts established.
- Their parents are informed and told of the School's plan of action.
- The aim is to help those responsible recognise the unacceptable nature and impact of their behaviour.

Further action

Where further action is required, it depends on the type of bullying, how the initial phase was handled and any previous history. A combination of the following may follow continued bullying:

- a note placed in a pupil's file for a set period;
- a verbal or written apology to the pupil who has been bullied;
- a verbal or written apology to that pupil's parents;
- restitution for any damage;
- targets and agreements for changes in behaviour;
- monitoring of behaviour over a defined period;
- referral to the Head, and possible suspension or expulsion where bullying persists and there is no likelihood of the problem being resolved, in line with the School's behaviour and discipline arrangements.

Where there is reason to believe a child is suffering, or is likely to suffer, significant harm, the matter will be treated as a safeguarding concern and managed under the Safeguarding and Child Protection Policy and Procedures, including referral to the Local Authority's children's social care where appropriate. The Head keeps the Safeguarding Governor informed of developments.

Cyberbullying

Cyberbullying is bullying that takes place using technology, such as mobile phones or online through social media, gaming, messaging or email. It can be particularly harmful because it can happen at any time, reach a wide audience quickly and be difficult to remove. We take cyberbullying as seriously as any other form of bullying and respond under this policy and, where relevant, the Safeguarding and Child Protection Policy and Procedures.

To reduce the risk of cyberbullying, the School educates pupils about safe and responsible use of technology through PSHE and the wider curriculum; issues pupils with School email addresses; operates filtering and monitoring of its systems; and sets clear expectations for the use of mobile phones and devices, in line with the Social Media Policy and Mobile Phone Policy. Pupils are helped to understand how to keep personal information secure and how to block, report and remove abusive content.

Although cyberbullying is not in itself a specific criminal offence, some behaviours — such as harassment, threatening or grossly offensive communications, upskirting, and the sharing of nudes or semi-nudes — may be criminal. Where the School considers that an incident may amount to a criminal offence, it will contact the Police.

Sharing of nudes and semi-nudes

Where a member of staff becomes aware of an incident involving the sharing of nudes or semi-nudes — sometimes described as self-generated intimate images or videos — by, or of, a pupil, they must refer it to the Designated Safeguarding Lead as soon as possible.

Staff must never view, copy, print, share, store or save the imagery themselves, or ask a child to share or download it — this is illegal. In exceptional circumstances, it may be necessary for the DSL only to view the image to safeguard the child or young person. That decision should be based on the professional judgement of the DSL.

The DSL will respond in line with the Safeguarding and Child Protection Policy and Procedures, Keeping Children Safe in Education 2026 and the current DfE guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people", and may make an immediate referral to the Police and/or children's social care where appropriate.

We recognise that these incidents increasingly involve artificial intelligence — for example images that have been altered or "nudified", or deepfakes — and may be linked to financially or sexually motivated extortion ("sextortion"). Creating or sharing an explicit image of a person under 18 is a criminal offence, including where the image is generated by AI; however, the law exists to protect children, and our response focuses on safeguarding the pupil rather than criminalising them.

Searching and examining electronic devices

In response to an allegation of cyberbullying, authorised staff may search for and examine an electronic device, such as a mobile phone, in accordance with the School's behaviour and search arrangements and the current DfE guidance "Searching, screening and confiscation". Such a search

requires the prior authority of the Head, and may be carried out where there are reasonable grounds to suspect the device has been, or is likely to be, used to cause harm, or break the law. A record is kept of any search and the action taken. Where a search raises a safeguarding concern, staff will follow the Safeguarding and Child Protection Policy and Procedures.

Early Years Foundation Stage (EYFS)

Our youngest children are encouraged to behave towards one another with kindness and consideration, to value difference and diversity, and to respect others and their belongings. Where hurtful behaviour occurs, staff explain gently why it is unacceptable and encourage more appropriate behaviour. Sanctions are rarely needed and are used proportionately; parents are always informed where a sanction is applied, and are invited to work with staff to agree a consistent approach where behaviour is repeated. Behaviour in the EYFS setting is managed by the Head of Prep School, in line with this policy and the Behaviour Policy.

9. Professional conduct and the example we set

A school depends on close and trusting relationships between adults and children, and among children themselves. Everyone should feel safe and at ease. Maintaining this atmosphere calls for professional practice, good judgement and common sense. Staff are expected to model the respectful behaviour we ask of pupils, and to seek advice from colleagues or the DSL whenever they are unsure. In particular, staff are expected to:

- treat every person with respect, whether present or absent, and respect each child's right to privacy;
- never permit abusive peer activities such as initiation ceremonies or ridicule, and never tolerate or facilitate verbal abuse;
- avoid comparing a child with siblings, and avoid salacious, suggestive or demeaning remarks or gestures;
- check the facts before drawing conclusions, and neither exaggerate nor trivialise pupils' concerns;
- avoid favouritism, or behaviour that could be interpreted as such, and maintain appropriate professional boundaries with pupils and their families;
- be careful with nicknames or any remark that could isolate a pupil, draw attention to a characteristic or set a cue for later bullying.

The following are mandatory requirements:

- Staff must not engage in physical horseplay that a pupil or another adult might misinterpret. Any physical contact between a member of staff and a pupil must be for the purposes of instruction or immediate care.
- Where physical restraint is genuinely necessary, staff must use the minimum force necessary and only where a pupil is at imminent risk of harming themselves, others or property. Where possible, a colleague should be summoned to witness and assist. Staff must refer to the Restrictive Intervention Policy (including the use of reasonable force) for full guidance.
- If a member of staff finds that their relationship with, or feelings towards, a pupil place them at risk of unprofessional behaviour, or if they suspect a pupil is becoming inappropriately attached to them, they must immediately seek advice from the Designated Safeguarding Lead.
- Staff must not allow a pupil to consume excessive alcohol in their presence, nor be in a pupil's presence while under the influence of alcohol.
- Staff must not engage in any electronic communication with pupils other than that required for academic work.

10. Recording, monitoring and review

Reports and incidents of bullying are recorded on CPOMS. The Deputy Head — Pastoral and Wellbeing holds the behaviour log and, working with the DSL, reviews this information periodically. Significant patterns or trends are reported to the Compliance Committee of the Governing Body. This policy is reviewed at least annually and following any relevant change in legislation or statutory guidance.

11. Related School policies and procedures

This policy should be read in conjunction with the following School policies and procedures:

- Behaviour Policy
- Safeguarding and Child Protection Policy and Procedures
- Social Media Policy for Pupils
- Mobile Phone Policy
- Taking, Using and Storing Images of Children Policy
- Relationships and Sex and Health Education (RSE) Policy
- Equal Opportunities Policy for Pupils
- Complaints Procedure Policy
- Restrictive Intervention Policy (including the use of reasonable force)
- Learning Support Policy
- Digital Technology Policy

12. Legislation, regulation and guidance

The following authoritative sources are relevant to this policy:

- Keeping Children Safe in Education 2026 (statutory; in force from 1 September 2026)
- Preventing and tackling bullying (DfE advice)
- Preventing and tackling the bullying and harassment of school staff (DfE, 9 July 2026)
- Sharing nudes and semi-nudes: advice for education settings (DfE)
- Searching, screening and confiscation (DfE)
- Equality Act 2010
- Education and Inspections Act 2006 (section 89)
- The Education (Independent School Standards) Regulations 2014
- Malicious Communications Act 1988