

Anti-bullying policy

Action	Policy to be reviewed biennially		
	Owner	Date	Completed
Review	Deputy Head (Pastoral)	September 2025	✓
Approved	Education Committee	7 October 2025	✓
Next Review		Autumn term 2027	

To be published on the following:	
Staff Portal	✓
Student Portal	✓
School website	✓

Anti-bullying policy

Who this policy applies to

This policy applies to all student members of the school's community. It applies whenever students are away from the school, e.g., on a school trip. It also involves online safety and prevention of digitised bullying behaviour.

What this policy is for

(i) This policy aims to:

- describe how the school aims to promote the safety of its students
- describe how the school increases understanding and awareness of bullying to facilitate early intervention and prevent patterns and trends of bullying occurring
- describe the steps that staff should take if they have concerns about a student with regard to bullying
- set out the support and guidance, and sanctions, that the school will give to students who suffer as either a perpetrator, or as a victim, of bullying
- recognise that students with protected characteristics may be more at risk from bullying than some of their peers; and
- establish a zero tolerance to bullying in the St Paul's Girls' School community.

(ii) Legal framework

- Part 3, Paragraph 10 of the Education (Independent School Standards) Regulations 2014

Other relevant school policies:

- Safeguarding (Child Protection) policy
- Behaviour policy
- Student Acceptable Use policy
- Child on child abuse policy
- Gender Identity policy
- Learning support policy
- Disability policy
- Expulsion, removal and review policy
- Equal Opportunities for students policy
- Complaints policy

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1. Aims and Objectives

1.1 At St Paul's Girls' School we are committed to providing a friendly and safe environment for all our students. This enables them to learn and develop in a supportive and secure atmosphere and so to realise their full potential. Every student has the right to be safe and happy here and to be protected when feeling vulnerable. We value thoughtfulness towards and respect for others, and all members of the school community – students, teachers and operations and administration staff, and parents – have a responsibility to help promote this. It follows that we will not tolerate bullying of any kind. If bullying does occur, the victim should feel confident about asking for help. Students should understand that withholding information protects the bully and allows them to continue the practice. Students and parents should be assured that they will be supported when bullying is reported. Bullying in schools is a form of child-on-child abuse and should never be passed off as “banter” or “part of growing up”.

2. Importance of addressing bullying

2.1 Protecting children and young people from harm is a responsibility we all share. Some forms of bullying are illegal and should be reported to the police¹. These include:

- violence or assault
- theft
- repeated harassment or intimidation, for example name calling, threats and abusive phone calls, emails or text messages
- hate crimes

2.2 If it is suspected that a victim of bullying is suffering or likely to suffer significant harm, the school will consider the incident as a safeguarding concern and involve the appropriate external agencies. Both the alleged bully and the alleged victim will be treated as “at risk” and, where appropriate, safeguarding procedures will be followed in relation to each child. Bullying can cause serious and long-term psychological damage to victims.

3. What is bullying?

3.1 Bullying is intentional behaviour that hurts another person, whether physically, emotionally or online, and may involve repeated actions such as name-calling, hitting, spreading rumours, or undermining someone. It can be prejudice-based or discriminatory, targeting characteristics such as race, gender, sexuality, disability or religion. Within the framework of Keeping Children Safe in Education, bullying is recognised as a form of child-on-child abuse and a safeguarding concern, requiring schools to take seriously all incidents, whether in person or online, that cause harm, fear or distress.

3.2. Sometimes behaviour that causes harm stems from thoughtlessness rather than deliberate intent. We must be mindful that a child who is bullying others may themselves be experiencing abuse, harm or difficulties, and therefore may be both a perpetrator and a victim. It can also be challenging for children who feel different from their peers, or who are made to feel different, and this can increase their vulnerability to engaging in bullying behaviour towards others.

3.3 Bullying causes fear and distress for the victim and may distract them from their schoolwork. The seriousness of bullying can be both physical and emotional (which may cause psychological damage). It may also affect other students who witness it, and it can damage the atmosphere in a class or even in the entire school.

3.4 Victim is a widely recognised and understood term. It is important that the school recognises that not everyone who has been subjected to bullying or harassment considers themselves a victim or would want to be described in this way. The school will be conscious of this when managing any incident and be prepared to use any term with which the individual student is most comfortable.

¹ [Bullying at school: The law - GOV.UK](https://www.gov.uk/guidance/keeping-children-safe-in-education)

3.5 Alleged perpetrator(s) and perpetrator(s) are also widely used and recognised terms; however, the school is mindful of terminology, especially when speaking in front of students, not least because in some cases the abusive behaviour will have been harmful to the perpetrator as well.

4. Examples of bullying behaviour

- 4.1 **Physical bullying** may include fighting; damaging or hiding someone else's belongings or clothes; setting up someone else to get the blame for a breach of school rules; initiation ceremonies.
- 4.2 **Emotional or psychological bullying** may include excluding someone from a group, activity, or place; spreading rumours, being deliberately unfriendly; unpleasant messages, emails or telephone calls or unpleasant material placed on social media.
- 4.3 **Verbal bullying** may include aggressive name calling, teasing, mockery (including food-shaming: see the Behaviour Policy), insults, "banter", harmful sexual behaviour, harassment and violence.
- 4.4 **Sexual violence and harassment** include making inappropriate comments about appearance and attractiveness, uninvited propositions, uninvited touching, using innuendo or inappropriate imagery, or upskirting.
- 4.5 **Child-on-child abuse** (including relationship abuse, sexting, sexual exploitation, and youth violence). See separate Child-on-Child Abuse Policy
- 4.6 **Bullying on the basis of protected characteristics.** This form of bullying is taken particularly seriously, and a separate log of such incidents is held in the school's pastoral recording system. It relates to perceived or actual differences. It can be based on characteristics unique to a child or young person's identity or circumstance, and can lead to prejudice or discriminatory language behaviour, including racism, sexism, homophobia, biphobia or transphobia.
- 4.7 **Cyberbullying**, which is the use of information and communications technology particularly mobile phones, email, social media, text messages, cameras and the internet, deliberately to upset or harass someone else (see *Preventing and Tackling Bullying July 2017*, guidance issued by the Department for Education). Examples of such behaviour include:
- Sending threatening or abusive text messages
 - Creating and sharing embarrassing images or videos
 - Trolling – the sending of menacing or upsetting images on social networks, chat rooms or online games
 - Excluding others from online games, activities, or friendship groups
 - Setting up hate sites or groups
 - Encouraging young people to self-harm or harm others
 - Creating fake accounts, hijacking, or stealing online identities to embarrass a young person or cause trouble using their name
 - Sending explicit messages, also known as sexting
 - Pressuring others into sending sexual images or engaging in sexual conversations
- 4.8 We may monitor and filter any device connected to the school network or to the wireless network. School-issued devices have filtering and monitoring software installed that allows the school to review users' online activity, whether or not these devices are accessing the internet via the school WiFi or other connection. Through the Student Acceptable Use Policy (AUP), students are educated as to good and safe use of digital technologies (see the Student AUP). In accordance with our Student AUP, a member of the pastoral or senior leadership team may also ask to look at materials on a personal device and decide whether to delete files if there is good reason to believe that such materials are being used to harass or upset another student. In such cases, the Deputy Head (Safeguarding & Inclusion)/DSL or Deputy Head (Pastoral) will inform the parents.

5. Relational aggression and child on child abuse

5.1 Children can abuse other children in various ways. *Relational aggression* means behaviour intended to harm others through damaging peer relationships, feelings of acceptance, friendship or group inclusion. It involves a deliberate intention to undermine a student's social standing or belonging, possibly causing social exclusion. Such behaviour can be overt or covert. Examples include:

- Teasing; embarrassing a student
- Imitating them behind their back
- Breaking confidences or secrets
- Spreading rumours or gossiping
- Whispering to exclude or undermine
- Sending abusive notes or messages
- Malicious exclusion from social groups or activities
- Coercive behaviour to manipulate or isolate

5.2 Relational aggression and covert bullying should be taken seriously and acted upon; they are not simply “normative” adolescent behaviour, and condoning or ignoring them allows them to escalate. All staff and older students must treat relational aggression with the same seriousness as overt bullying.

5.3 Safeguarding issues can manifest themselves via child-on-child abuse. This includes:

- Bullying
- Online/Cyberbullying
- Physical abuse
- Verbal abuse
- Emotional abuse
- Sexual abuse
- Sexual violence and sexual harassment
- Upskirting
- Sexting (including sharing nude images and semi-nude images)
- Initiation / hazing type violence and rituals
- Financial abuse

5.4 Upskirting is a criminal offence. It is an act of taking a photograph, without consent, from underneath a person's clothing. The purpose may be sexual gratification, or to cause the victim distress and alarm.

6. Sexual violence and sexual harassment

6.1 Sexual violence and sexual harassment can occur between two children of any age. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and harassment, which exist on a continuum and may overlap, can occur online and offline (both physical and verbal) and are never acceptable. Staff should be aware that some groups are potentially more at risk (e.g., children with learning difficulties, LGBTQ+ children and transgender or non-binary children). Further information about types of sexual violence can be found in Keeping Children Safe in Education (September 2025) Part 5, p.112.

7. Criminal Law

7.1 Some forms of bullying are illegal² such as violence and assault, theft, harassment and intimidation and hate crimes, and should be reported to the police. In addition, under the Malicious Communications Act 1988, any person who sends a letter, electronic communication or article of any description which conveys a message which is indecent or grossly offensive, a threat, or

² <https://www.gov.uk/bullying-at-school>

information which is false and known or believed to be false by the sender, is guilty of an offence if their purpose in sending it was to cause distress or anxiety to the recipient.

8. What are the signs of bullying?

8.1 It is not always easy or even possible to tell whether someone is upset as a result of being bullied. Young people who feel under emotional pressure may find it hard to talk.

8.2 There may be changes in behaviour, such as shyness and nervousness, demands for attention, feigned or real illness. Work and sleep patterns may change. There may be lack of concentration or withdrawal, and a student who is being bullied or feels vulnerable may be unwilling to attend school.

9. Bullying outside school premises

9.1 Bullying that takes place outside of school and which is reported to school staff, will be investigated, and acted on. The Deputy Head (Pastoral), alongside the Deputy Head (Safeguarding & Inclusion)/DSL (DSL), will consider whether it is appropriate to notify the police or children's social services in the event of the matter being deemed a safeguarding concern. The Deputy Head (Pastoral) may consider whether it is appropriate to notify the police or anti-social behaviour coordinator in their local authority of the action taken against a student. If the misbehaviour could be criminal or poses a serious threat to a member of the public, the police will be informed.

10. Implementation of this policy

10.1 In promoting a culture which rejects bullying, we take the following steps:

10.1.1 Bullying is defined as "strictly forbidden" behaviour in our guidelines on Being a Member of the St Paul's Community (see our Behaviour Policy).

10.1.2 Positive values of diversity, inclusion, mutual respect, and consideration will be promoted within the school in a wide range of contexts from assembly and tutorial periods to informal discussion and academic lessons.

10.1.3 The Personal, Social and Health Education (PSHE) course addresses the topic of bullying and relational aggression regularly. Tutors will also remind students at the start of each academic year of their responsibility to ensure that bullying does not occur and to talk to a member of staff if they witness or suspect bullying.

10.1.4 We have a well-established system of peer support that is promoted through tutor groups and assemblies. Older students are trained to run sessions and workshops that students who have concerns or feel lonely can attend. Year and whole school assemblies also discuss behavioural issues. Regular wellbeing and PSHE surveys also contribute to our anti-bullying approach. Where serious problems or worries emerge, teachers are alerted immediately.

10.1.5 We display in all tutor bases, the photographs and contact details of the Safeguarding team which explains all the different ways in which students can raise concerns. School Values also support our inclusive approach.

10.1.6 Elements of the academic curriculum are used to foster a supportive and inclusive ethos within the school. Some of the themes in literature, drama, history and current affairs provide opportunities for raising awareness of bullying. Assemblies promote mutual respect, thereby fostering a community in which each individual is valued.

10.1.7 Talks to students, staff, and parents alike by staff or outside speakers help to raise awareness of the issues surrounding bullying, including cyberbullying, how to deal with it if it occurs, and the role they can play to prevent bullying, including when they find themselves as bystanders, both on and off-line.

- 10.1.8 In the event of an observed or reported instance of bullying, the facts will be ascertained from the victim(s), alleged perpetrator(s), and witness(es). The member of staff contacted/witness will record on CPOMS who was involved, what happened, when and where. This will be passed to the relevant tutor(s), who will liaise with the appropriate Head of Year. **The Designated Safeguarding Lead must be informed of all suspicions and incidents of bullying.**
- 10.1.9 The Head of Year/Section, the Deputy Head (Senior School), or the Deputy Head (Pastoral) will identify patterns and decide what action needs to be taken to prevent similar occurrences.
- 10.1.10 The school will keep parents informed if it is dealing with a bullying situation. Parents are asked to let the school (usually the tutor) know directly if they have cause for concern. The school always tries to handle information discreetly, but staff are not able to promise confidentiality, particularly if there are child protection concerns or if the matter becomes part of an investigation into serious misconduct. If matters need to be followed up, the staff will do so with sensitivity. It is much easier to counter problems at an early stage than when bullying behaviour is well established.
- 10.1.11 Once investigated, every effort will be made to resolve the problem through counselling or coaching of both parties, which will seek to support the victim(s) and change the behaviour of the perpetrator(s).
- 10.1.12 The school acknowledges that in some circumstances the consequences of bullying may lead to a student experiencing pronounced social, emotional or mental health difficulties. The school has a responsibility to support students who are bullied and to make appropriate provision for their needs. The nature and level of support will depend on the individual circumstances and the level of need.
- 10.1.13 For all incidents of bullying (whether isolated or occurring over a period of time) disciplinary sanctions will normally be applied, and this may extend to suspension, a requirement to leave or – in the gravest cases of severe or persistent bullying – expulsion. Counselling may, however, be maintained for both parties even after certain sanctions have been applied.

11. Responsibility

11.1 Responsibility for excluding bullying rests with all staff, but the Deputy Head (Pastoral) and Deputy Head (Safeguarding & Inclusion)/DSL, Heads of Year/Section and tutors provide first line accountability and expertise. The school has a duty of care towards the students and should an instance of bullying raise child protection concerns, the school's Safeguarding (Child Protection) policy will be implemented. The Designated Safeguarding Lead is responsible for dealing with matters relating to child protection and welfare.

11.2 Staff are regularly trained and know how to identify signs of bullying.

11.3 Student voice is an important component of the school's anti-bullying approach; Peer Mentors run year group sessions; the Consent and Respect (CAR) Committee also upholds our anti-bullying policy; the Inclusion Committee provides a regular forum for learning and discussion; Form Captains debate these issues if they occur within their groups. A pastoral survey is conducted regularly across year groups and with parents.

11.4 It is clearly understood that early intervention and parental involvement are key in successfully dealing with allegations of bullying. The safeguarding team will make contact with parents to help resolve any allegations.

12. Dissemination

12.1 The school will ensure that students are aware of this policy through PSHE and tutor time. Parents/guardians can access this policy via the school website.

13. Monitoring and Evaluation

13.1 The Deputy Head (Pastoral) holds a central record of pastoral incidents, including bullying, to identify any patterns or specific areas of concern. Incidents of bullying, including an anonymised version of the separate log for protected characteristic bullying, are reported to Governors termly as part of our regular review of safeguarding.

13.2 The policy is monitored, evaluated and reviewed biennially. We will include students in the review and ensure that questions about how safe they feel are included in surveys we undertake. The policy is applied in conjunction with the school's Behaviour and Student Acceptable Use policies.

Availability of this policy

A copy of this policy may be downloaded from our [website](#) or is available on request from the school office, St Paul's Girls' School, Brook Green, London, W6 7BS (tel: 0207 603 2288). This policy can be made available in large print or other accessible format if required.