



**Five  
Rivers.**<sup>®</sup>

# FIVE RIVERS CHILDCARE LTD

Anti-  
Bullying  
Policy  
Appendix

Willow  
Haven  
Centre

Five.Rivers.is.committed.to.safeguarding.and.promoting.the.welfare.of.childrenand.young.people.and.expects.all.  
staff.and.volunteers.to.share.this.commitment

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# 1. Anti Bullying Appendix

## 1.1 Policy Statement

This details the school specific processes for Anti-Bullying at Willow Haven Centre. This appendix outlines how bullying is recorded, monitored, and responded to within the provision. It should be read alongside the organisation's Anti-Bullying Policy.

## 1.2 Terms and Definitions

The below table sets out a number of terms and definitions used within this document:

Term	Definition
Nil.	

## 1.3 Data Protection

Five Rivers supports the objectives of the General Data Protection Regulation (GDPR) & Data Protection Act 2018 and other legislation relating to Data Processing, including the Human Rights Act 1998, Regulation of Investigatory Powers Act 2000 and the Freedom of Information Act 2000. Five Rivers Child Care has a statutory obligation to process personal data in accordance with the provisions of the GDPR & Data Protection Act, 2018.

Every member of Five Rivers Child Care has an obligation to ensure that the information they process (use) is collected, maintained and disclosed in accordance with the principles of the GDPR & Data Protection Act, 2018 and the Five Rivers Data Protection Policy.

## 1.4 Disclosure of Information

It is a criminal offence for a person to knowingly or recklessly sell, disclose or retain personal information outside of the Five Rivers Group under section 170 DPA 2018 without a legitimate purpose and legal basis. The Five Rivers Group considers these actions unauthorised and will take all necessary action to ensure personal data is not disclosed, retained or sold without a valid legal reason including referral to the criminal investigations team of the information commissioner's office (CRIT ICO).

## 1. Anti-Bullying Policy Appendix

### 1.1 Recording, Reporting, and Monitoring

All concerns or incidents relating to bullying or child-on-child abuse must be reported immediately to the Designated Safeguarding Lead (DSL).

All incidents are recorded factually, objectively, and in appropriate detail on ClearCare, in line with safeguarding and data protection procedures.

Records include:

- A clear, factual account of the incident or concern
- The views and voice of the child where appropriate
- Any immediate actions taken
- Decisions made and the rationale for these
- Outcomes, support offered, and follow-up actions

ClearCare records generate a PDF incident report, which within 24 hours is shared with the named person at the school where the young person remains on roll, in line with agreed information-sharing arrangements.

Patterns of behaviour are monitored over time to identify repeat concerns or emerging risks.

Where appropriate, additional professionals are informed in line with safeguarding thresholds.

Parents/carers are informed using professional judgement and safeguarding guidance.

If an incident meets safeguarding thresholds, it is managed under Child Protection procedures.