



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

Anti Bullying Policy & Procedure

Five Rivers Child Care Ltd

Policy Owner	Headteacher
Authoriser	Head of Education
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1. Policy

1.1 Policy Statement

We are committed to providing a caring, inclusive, and safe environment where all children and young people feel respected, valued, and protected. Bullying of any kind is unacceptable and will not be tolerated.

All members of our community have a responsibility to report concerns. We are a TELLING organisation, where reporting concerns is encouraged, supported, and never viewed negatively.

This policy is aligned with:

- DfE Preventing and Tackling Bullying
- Keeping Children Safe in Education (KCSIE)
- Equality Act 2010
- Safeguarding and Behaviour policies

1.2 Data Protection

The Five Rivers Group supports the objectives of the United Kingdom General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018) and other legislation relating to Data Processing, including the Human Rights Act 1998, the Safeguarding of Vulnerable Groups Act 2006 and the regulations that underpin our services. The Five Rivers Group has a statutory obligation to process personal data in accordance with the provisions of the United Kingdom General Data Protection Regulation (UKGDPR) and the Data Protection Act 2018.

Every member of The Five Rivers Group has an obligation to ensure that the information they process (use) is collected, maintained and disclosed in accordance with the United Kingdom General Data Protection Regulation (UKGDPR), the Data Protection Act 2018, the Five Rivers Group Data Protection Policy and The Five Rivers Group Data Retention Policy.

1.3 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).

2. Definitions

Bullying is:

- Behaviour by an individual or group, repeated over time, that intentionally causes harm (physical, emotional, or psychological).
- Bullying may be:
- Physical – hitting, kicking, pushing
- Emotional – exclusion, manipulation, humiliation
- Verbal – name-calling, threats, rumours
- Cyber – online harassment via social media, messaging, gaming platforms
- Prejudice-based – related to protected characteristics
- Sexual/sexist – inappropriate comments, harassment

Bullying can occur face-to-face, online, or indirectly.

2.1 Prejudice-Based Bullying

We recognise bullying linked to protected characteristics under the Equality Act 2010, including:

- Disability
- Race
- Religion or belief
- Sex
- Sexual orientation
- Gender reassignment

We also recognise vulnerabilities linked to:

- Care experience
- Socio-economic status
- Young carers
- Special educational needs

3. Safeguarding Link

Bullying is a safeguarding concern and may:

- Indicate wider harm or abuse
- Lead to mental health difficulties
- Require early help or statutory intervention

All concerns must be handled in line with safeguarding procedures.

4. Prevention Strategies

We proactively prevent bullying through:

Whole Organisation Approach

- Clear behaviour expectations and values
- Staff role modelling respectful behaviour
- Regular safeguarding and anti-bullying training
- Strong supervision in identified risk areas

Education & Curriculum

- PSHE and Relationships Education
- Online safety education (aligned with UKCIS guidance)
- Discussions on diversity, inclusion, and equality
- Participation in Anti-Bullying Week

Pupil Voice

- Encouraging reporting
- Involving young people in developing solutions

5. Online & Cyberbullying

We recognise the evolving digital landscape:

- Bullying can occur 24/7 and beyond physical settings
- Includes social media, gaming platforms, messaging apps

Staff Responsibilities:

- Take all online concerns seriously
- Secure and preserve evidence (screenshots, logs)
- Report safeguarding concerns where appropriate

Pupil Education:

Young people are taught to:

- Use technology responsibly
- Protect personal information
- Report concerns immediately

6. Making or sharing of nudes or semi-nudes

(Previously referred to as sexting)

Incidents involving the making or sharing of nudes or semi-nudes will be managed in accordance with KCSIE 2026, local safeguarding procedures and the government's guidance on sharing nudes and semi-nudes.

Managed in line with safeguarding guidance

- Considered a child protection concern
- Staff must not investigate independently beyond initial evidence gathering
- Referred to Designated Safeguarding Lead (DSL) immediately

7. Recognising Signs of Bullying

Indicators may include:

- Withdrawal, anxiety, or distress
- Changes in behaviour or attendance
- Decline in academic engagement
- Self-harm or risk-taking behaviours
- Damage or loss of belongings

All concerns must be taken seriously and explored

8. Reporting Procedures

- All staff must report concerns immediately to the Headteacher/DSL
- Incidents are recorded in line with safeguarding and behaviour systems
- Parents/carers informed where appropriate

Serious cases:

- May involve external agencies (social care, police)

9. Responding to Bullying

Key Principles

Responses will be:

- Proportionate
- Consistent
- Trauma-informed
- Focused on both safety and behaviour change

10. Investigation Process

Listen to all parties (victim, alleged perpetrator, witnesses)

- Record facts clearly
- Avoid assumptions
- Ensure confidentiality where possible

11. Supporting Those Involved

Victims

- Provide reassurance and emotional support
- Agree safety plans
- Regular check-ins
- Access to pastoral or therapeutic support

Those Displaying Bullying Behaviour

- Address behaviour, not label the child
- Understand underlying causes
- Provide education and support
- Apply consequences where appropriate

Bystanders

- Educate on responsibility
- Encourage positive intervention
- Address harmful participation

12. Consequences

Consequences are:

- Proportionate to severity
- Restorative where possible
- Designed to educate and prevent recurrence

May include:

- Restorative conversations
- Loss of privileges
- Behaviour contracts
- Increased supervision
- Formal sanctions

Serious/repeated incidents:

- Escalated through senior leadership
- May involve external agencies

13. Monitoring and Review

- All incidents tracked and analysed
- Patterns identified (location, group, type)
- Policy reviewed annually or following significant incidents

14. Working with Parents/Carers

We will:

- Inform and involve parents appropriately
- Provide advice on supporting children
- Maintain clear communication

15. Off-Site Behaviour

This policy applies:

- On school premises
- During off-site activities
- Online, where impact affects the child's safety or wellbeing

16. Promoting a Positive Culture

We actively promote:

- Respect
- Inclusion
- Diversity
- Emotional wellbeing

Bullying prevention is embedded across all areas of practice.

Appendix A

The following explanations of Prejudice-based bullying are from Appendix 2 of Respect For All: A National approach to bullying.

Additional Support Needs: These can arise for any reason and be of short or long-term duration. Additional support may be required to overcome needs arising from learning environment; health or disability; family circumstances or social and emotional factors, and therefore may relate to a protected characteristic. A child or young person may be bullied

because they have an additional support need and crucially being bullied can also lead to an additional support need.

Age: Age is a protected characteristic although prejudice and discrimination based on age is not applicable in school settings, it can affect children and young people in a variety of other settings. For example, in workplaces, further and higher education and in wider society.

Asylum Seekers and Refugees: Children and Young people who are asylum seekers or refugees may be at greater risk of bullying directly and indirectly. Some bullying behaviour against these groups may be of a racist nature which, given that race is a protected characteristic, can contravene equality legislation and have hate crime implications. Stigma, due to lack of knowledge and, given that race is a protected characteristic, understanding of asylum seekers and refugees, and reluctance to burden parents with extra worries can allow bullying to go undetected and continue.

Body Image and Physical Appearance: This can be hugely important to children and young people with bullying because of body image having the potential to negatively impact on their wellbeing. In some cases, body image and physical appearance may relate to a protected characteristic, such as race or disability.

Disability: Disability is a Protected Characteristic. People who bully others may see disabled children and young people as being less able to defend themselves and less able to tell an adult about the bullying. The language and behaviour used may be a result of a lack of understanding about the nature of a person's disability. Increased understanding about disability and the impact it can have can help reduce bullying.

Gender Identity and Transphobic Bullying: The term 'transgender' is an umbrella term for those whose gender identity or expression differs in some way from the sex that was assigned to them at birth. Gender identity reflects an individual's internal sense of self is being male, female, neither or aspects of both. Gender reassignment is a protected characteristic. Transgender people face significant societal prejudice largely because they are perceived as not conforming to gender stereotypes, expectations and norms. As a result, transgender children and young people can be particularly vulnerable to bullying.

This can manifest in many ways including transphobic name calling or deliberately misgendering them. An individual may also experience transphobic bullying if someone is perceived to be transgender or someone they are associate with, is transgender, i.e. a parent, relative or other significant figure. The term 'gender reassignment' is a protected characteristic within the Equality Act 2010 and refers to those who propose to go through, are going through, or have gone through a process of gender re-assignment.

Gypsy/Travellers: Children and young people who are Gypsy/Travellers may be at greater risk of bullying directly and indirectly. Some bullying behaviour against these groups may be of a racist nature which, given that race is a protected characteristic, can contravene equality legislation and have hate crime implications. Perceived risks about bullying and given that race is a protected characteristic parents' own experiences of discriminatory behaviour may lead to

low levels of enrolment and poor attendance for Gypsy/Traveller children and young people as well as early exit from formal education. Other Traveller families, such as Roma, may have similar concerns.

Sexual Orientation, Homophobic, Biphobic and Transphobic Bullying: Sexual orientation is a protected characteristic within the Equality Act 2010. Bullying based on sexual orientation is largely motivated by prejudice towards lesbian, gay or bisexual people. Homophobic bullying is when a young person's actual or perceived sexual orientation is used to exclude, threaten, hurt, or humiliate them.

Any young person can be homophobically bullied, whether they are LGBT or not. Sometimes young people can be homophobically bullied because others think that they are LGBT, because they have LGBT family or friends or often because they are seen as different or not conforming to traditional gender stereotypes. Transgender children and young people can therefore also experience homophobic bullying.

Homophobic language and jokes around the school can create a climate of homophobia; for example, the use of the word 'gay' to mean sub-standard or uncool. This type of language should therefore be addressed.

Intersectionality: Understanding the different and unequal social and economic outcomes for particular groups, based on intersections between race, ethnicity, class, gender, sexual orientation, disability, and age. In the context of anti-bullying, it is important to understand the connection between the experience of belonging to one or more of these groups and a resultant inequality in attainment and wellbeing.

Care experienced Children and Young People: Care experienced children and young people can be particularly vulnerable to bullying. Children can face bullying behaviour simply because they are care-experienced and seen in some way as 'different'. Children who are looked after away from home can also experience bullying behaviour in their residential care home, at school and in their community. Care-experienced children and young people may not always have a stable support network to turn to when experiencing bullying. For some children forming positive relationships with peers and adults can be more difficult due to their early childhood adversity. Developing trusting and supportive relationships between children and practitioners is required to address bullying of all forms and in all settings.

Marriage/Civil Partnership: Marriage and civil partnership is a protected characteristic. Whilst it is unlikely that a school-aged pupil will be in a same sex marriage or civil partnership and directly experience prejudice and discrimination as a result, there could be instances of indirect discrimination, for example, if the child or young person is associated with someone (parent, sibling, etc.) who is in a same sex marriage or civil partnership or in a same sex relationship. Marriage and civil partnership discrimination and prejudice can also affect children and young people in a variety of other settings, for example, in workplaces, further and higher education and in wider society.

Racism and Race: Race is a protected characteristic. Children and young people from minority

ethnic groups often experience bullying based on perceived differences in dress, communication, appearance, beliefs and/or culture as well as their skin colour and accent. The status of the ethnic group a child belongs to (or people assume they belong to) in a school, community or organisation can often lead to a child or young person experiencing bullying behaviour. This can arise from a misguided and/or learned belief that they are less valued and 'deserve' to be treated differently, or with less respect.

Religion or Belief: Religion or belief is a protected characteristic. Lack of knowledge and understanding about the traditions, beliefs and etiquette of different faiths can lead to religious intolerance. Lack of awareness about the differences in practices of religions such as prayer times, dietary requirements, fasting and the wearing of religious clothing or articles of faith can result in misunderstandings and stereotyping, which may lead to bullying. People who have a religion or belief as well as those who do not, are protected under the Equality Act 2010.

Sectarianism: Most people understandably associate sectarianism with religion, which is a protected characteristic. The reality of prejudice however means that your family background, the football team you support, the community you live in, the school you attend and even the colour of your clothing can mark you out for sectarian abuse whatever your beliefs may be. In Scotland, sectarianism is most often related to Protestant and Roman Catholic divisions within Christianity but can also relate to other religions, for example Sunni and Shia Muslims within Islam, and Orthodox and Reform Jews within Judaism.

Sexism and Gender: Sex, sexual orientation and gender reassignment are all protected characteristics. Bullying in the form of derogatory language and the spreading of malicious rumours can be used to regulate both girls' and boys' behaviour – suggesting that they are not being a real man or a real woman. These terms can be of an explicit sexual nature and it is worth noting that many can involve using terms for people who are gay and lesbian as a negative towards a person's masculinity or femininity. Sexism and gender stereotypes feed into homophobia, biphobia and transphobia. Gender stereotyping, based on the notion of acceptable and unacceptable male and female behaviour, can leave children and young people who are perceived not to conform to these notions vulnerable to indirect and direct bullying. Personality traits that do not fit into the unwritten rules of 'appropriate' male and female behaviour can lead to bullying because of the prejudice towards their perceived difference.

Socio-economic Prejudice: Bullying due to socio-economic status can take place in any community. Small differences in perceived family income/family living arrangements/ social circumstances or values can be used as a basis for bullying behaviours. These behaviours, such as mocking speech patterns, accents, belongings, clothing, etc can become widespread through those considering themselves to be in the dominant socioeconomic group. Bullying of children who endure parental substance misuse can also be prevalent.

Young Carers: The lives of young carers can be significantly affected by their responsibility to care for a family member who has a physical illness or disability, mental health problem,

sensory or learning disability or issues with the misuse of drugs or alcohol. Young carers are at risk of bullying for a variety of reasons. Depending on responsibilities at home, they may find themselves being unable to fully participate in school or after-school activities or 'fun stuff'. This can make it difficult for them to form relationships; it can hinder successful transitions or lead to educational difficulties.

17. Procedure

17.1 Concern Raised

Bullying concern reported by pupil, staff, or parent

17.2 Record & Report

Staff record incident on CURA and report to DSL/Headteacher

17.3 Initial Risk Assessment

Consider:

- Safeguarding risk
- Immediate safety of child
- Need for urgent action

17.4 Investigation

Speak to:

- Victim
- Alleged perpetrator
- Witnesses
- Gather evidence

17.5 Decision & Action Plan

- Determine if bullying has occurred
- Develop proportionate response

17.6 Support

- Provide ongoing support for victim

- Address behaviour with child displaying bullying behaviours

17.7 Consequences

- Apply appropriate responses

17.8 Monitor & Review

- Follow up with all parties
- Ensure bullying has stopped
- Adjust support plan if needed