



## Anti-bullying Policy

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| <b>Approved by</b>                | Richard McCabe                                             |
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| <b>Applies to</b>                 | All registered pupils aged 7–16 at Grovehill and Gaddesden |
| <b>Document status</b>            | Final                                                      |
| <b>Proprietor/chair signature</b> |                                                            |

### Related policies

[Behaviour Policy](#)

[Child Protection and Safeguarding Policy](#)

[Online Safety Policy](#)

[Equality and Diversity Policy](#)

[Complaints Policy](#)



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## 1. Purpose and scope

This policy explains how Redbourn Park School prevents, identifies, records and responds to bullying. It applies to all registered pupils at both the Grovehill and Gaddesden sites.

Redbourn Park School is an independent special school. Our pupils have a range of special educational needs and disabilities (SEND), including communication, sensory, social, emotional and mental health needs. Our approach must therefore be accessible, trauma-informed and responsive to each pupil's communication profile and reasonable adjustments.

The policy applies during the school day and to school-arranged transport, educational visits, community activities and online or off-site behaviour that affects a pupil's safety, welfare or education, or the safe and orderly running of the school.

The school's values of Safety, Empathy and Ambition require a calm, respectful and inclusive environment in which pupils know how to seek help, concerns are taken seriously and everyone affected receives appropriate support. An Easy Read/AAC-supported version and staff help to access this policy will be available.

This policy supports the school's duties under the Education (Independent School Standards) Regulations 2014, the Equality Act 2010 and current statutory safeguarding guidance. It should be read alongside the policies listed on the front page.

## 2. What bullying means

Bullying is behaviour by an individual or group that is intended to hurt another person, is repeated over time and involves an imbalance of power. The behaviour may be physical, verbal, emotional, relational, sexual or online.

The imbalance of power may arise from physical strength, popularity, access to information or technology, age, perceived status, or a person's disability, communication needs or other vulnerability. Harm may be deliberate even when a pupil does not fully understand its impact.

Ordinary disagreement or conflict between pupils of broadly equal power is not necessarily bullying. It may still require support, restorative work, behaviour intervention or safeguarding action.

### 2.1 One-off serious incidents, discrimination and harassment

A single incident does not have to meet the definition of bullying before the school acts. Serious violence, threats, discriminatory behaviour, harassment, sexual harassment, sexual violence, sharing sexual imagery, coercion or other child-on-child abuse will be addressed under the school's behaviour, equality and safeguarding procedures.

Abuse and prejudice are never dismissed as "banter", "just having a laugh" or an inevitable part of growing up.

### 2.2 Forms of bullying

- Physical behaviour, including hitting, kicking, pushing, taking or damaging belongings, intimidation or unwanted physical contact.
- Verbal or relational behaviour, including insults, threats, rumours, deliberate exclusion, humiliation or manipulating friendships.

- Online behaviour, including abusive messages, group-chat exclusion, impersonation, image sharing, harassment, doxxing or encouraging others to target someone.
- Prejudice-related behaviour connected with actual or perceived disability, race, religion or belief, sex, sexual orientation, gender reassignment, pregnancy or maternity, or another aspect of identity.
- Sexualised behaviour, including unwanted sexual comments, jokes, gestures, pressure, contact or circulation of sexual content.
- Coercion or exploitation, including forcing someone to give money, possessions, passwords, images or access to an account.

## **2.3 SEND, communication and emotional regulation**

Pupils with SEND can be more vulnerable to bullying and may find it harder to identify, describe or report what has happened. Staff must not assume that distressed or changed behaviour is simply part of a pupil's diagnosis.

At the same time, behaviour arising from dysregulation, sensory overload, trauma, communication difficulty or social misunderstanding must not automatically be labelled as bullying. Staff will assess intention, repetition, power, context and impact, while taking immediate action to keep pupils safe.

The school will use familiar adults, accessible language, visual supports, augmentative and alternative communication, processing time and other reasonable adjustments where needed.

## **3. Preventing bullying**

### **3.1 School culture and curriculum**

The school works to prevent bullying through an explicit culture of safety, dignity and belonging. Prevention includes:

- clear expectations for respectful behaviour and consistent adult modelling;
- teaching about relationships, consent, boundaries, equality, online safety, prejudice and how to seek help;
- challenging discriminatory language, sexualised comments and harmful "banter" promptly;
- planning supervision for higher-risk locations, transitions, breaktimes, transport and community activities;
- providing predictable routines, safe spaces and communication support;
- using individual risk assessments, support plans and reasonable adjustments where appropriate; and
- working with parents, carers, transport providers and other settings when concerns cross organisational boundaries, with a named school contact, secure handover, agreed immediate action and a record of what each organisation will do.

### **3.2 Pupil voice, staff development and transition**

Pupils will have regular, accessible opportunities to say whether they feel safe and what would help. The school will use surveys, individual discussions, key-worker sessions, school council activity and other appropriate methods.

Staff receive training appropriate to their role on recognising bullying, prejudice-related incidents, child-on-child abuse, online harm, SEND-related vulnerability, recording concerns and responding in a way that does not increase risk.

Information needed to keep a pupil safe will be considered during admission, transition between sites or classes, reintegration after absence and preparation for a new placement.

## **4. Reporting a concern**

Any pupil, parent, carer, member of staff, visitor or professional may report suspected bullying. A person does not need proof before raising a concern.

### **4.1 Accessible ways to report**

A pupil may report:

- to any member of staff or another trusted adult;
- in person, in writing, by drawing, through visual prompts, by email or through their usual communication system;
- through a parent, carer, advocate, peer or external professional; or
- during a planned check-in or in a quieter, lower-arousal setting.

Staff must notice non-verbal signs such as withdrawal, avoidance, distress, changes in attendance, reduced engagement, unexplained injuries, damaged belongings or changes in online use. These signs do not prove bullying, but they must be explored sensitively.

A staff member who receives a report must listen, record it and pass it promptly to the relevant Site Lead/DDSL: Joe Scales at Grovehill or Emily Giddens at Gaddesden. They must not tell a pupil to ignore the behaviour or resolve it alone.

### **4.2 What happens next**

The receiving adult will:

- check whether anyone needs immediate protection, medical help or emotional support;
- listen without blame, use open and accessible questions and avoid repeated retelling;
- explain that the concern will be shared only with people who need the information and never promise absolute confidentiality;
- record the pupil's words, communication or presentation as accurately as possible;
- inform the relevant Site Lead/DDSL without delay and, where safeguarding may be involved, Jennifer Bryant, Designated Safeguarding Lead (DSL);
- preserve relevant evidence, including messages or screenshots, without asking pupils to circulate harmful material; and
- agree initial safety measures and when the pupil will next receive an update.

Parents or carers will normally be informed at an early stage. Information may be limited or delayed where sharing it could place a child at risk, compromise a safeguarding or police response, or disclose another pupil's confidential information.

## **5. Responding to concerns**

### **5.1 Immediate response and safeguarding**

The first priority is safety. Staff will separate pupils where needed, arrange supervision, address urgent health needs and ask the Site Lead/DDSL to coordinate any immediate change to transport, timetables, device access or other arrangements.

Where the concern may involve child-on-child abuse, significant harm, exploitation, a criminal offence or another safeguarding risk, the DSL will follow the Child Protection and Safeguarding Policy, including liaison with children's social care or the police when appropriate. The school's bullying response will not delay a safeguarding referral.

## **5.2 Investigation and reasonable adjustments**

The relevant Site Lead/acting headteacher, or a suitable person formally delegated by them, will coordinate a prompt, fair and proportionate investigation. This will normally include:

- speaking separately with the pupil who reported the concern, the pupil whose behaviour is of concern and relevant witnesses;
- reviewing records, patterns, locations, communications and available evidence;
- considering previous incidents, power differences, protected characteristics, SEND, communication needs and the impact on each pupil;
- using familiar adults, clear language, visual support, breaks and processing time as required;
- avoiding leading questions, public confrontation and unnecessary repetition; and
- recording the evidence considered, decisions reached and reasons for them.

A pupil will not be required to take part in a face-to-face meeting, mediation or restorative activity. Such approaches will be used only when they are safe, suitable and freely agreed.

The person leading the response will avoid promising a particular outcome before the facts have been considered. Information will be handled sensitively, but absolute confidentiality cannot be guaranteed.

## **5.3 Online and off-site concerns**

The school will consider online and off-site behaviour when it affects pupils at school, their safety or welfare, or the school's safe and orderly operation. The response may include liaison with parents, carers, transport providers, another school, a platform, children's social care or the police.

Staff should preserve evidence safely and should not view, copy or forward indecent images of children unless this is specifically required under safeguarding procedures. Any search, screening, confiscation or deletion of content must be undertaken only by appropriately authorised staff in line with current Department for Education guidance, the school's policies, safeguarding duties and reasonable adjustments.

## **5.4 Outcomes and proportionate responses**

Outcomes will reflect the evidence, risk, impact, age and developmental understanding of the pupils involved, their SEND and communication needs, any protected characteristic, previous patterns and the need to prevent recurrence.

Possible actions include:

- a written safety or support plan and increased supervision;
- changes to seating, grouping, transitions, transport or access to particular spaces or devices;
- direct teaching, mentoring, therapeutic or pastoral support;
- restorative work, where safe and freely agreed;
- communication and agreed work with parents or carers;

- a proportionate behaviour response under the Behaviour Policy and the school's contractual arrangements;
- review of individual risk assessments, behaviour support plans or reasonable adjustments; and
- safeguarding referral, external-agency involvement or police liaison where required.

The school will not use SEND as a reason to minimise harm. Equally, it will not apply a response without considering disability-related behaviour and the duty to make reasonable adjustments.

Parents and carers will be told the outcome and the steps relevant to their child, subject to confidentiality and data-protection requirements. The school may not be able to share personal information or a specific consequence relating to another pupil.

## **6. Support, action and follow-up**

### **6.1 Support for the pupil who experienced bullying**

Support will be agreed with the pupil and may include:

- a named trusted adult and planned check-ins;
- an accessible safety plan, including help for transitions and less-structured times;
- temporary or longer-term changes to educational or transport arrangements;
- pastoral, therapeutic, health or external-agency support;
- help to manage online accounts and preserve or report evidence; and
- regular opportunities for the pupil to say whether the action is working.

The pupil who experienced bullying will not be treated as responsible for preventing further harm. Any change that affects them, including transport or device arrangements, will be discussed accessibly, recorded, reviewed and kept to the minimum necessary.

### **6.2 Support for the pupil whose behaviour caused harm**

The school will set clear boundaries and address the harm while seeking to understand what is driving the behaviour. Support may include direct teaching, communication work, emotional-regulation support, therapeutic input, family work, safeguarding assessment and review of the pupil's individual plans.

Support does not remove accountability. The aim is to reduce risk, build safer skills and prevent repetition.

### **6.3 Follow-up**

The nominated staff member will set review dates and check with the pupils involved, relevant staff and parents or carers. Follow-up will consider whether the behaviour has stopped, whether safety arrangements are working, whether retaliation or displacement has occurred and whether further action is needed.

A concern will not be closed solely because an apology has been given or an initial consequence completed.

## **7. Roles and responsibilities**

### **7.1 Proprietor/chair**

Richard McCabe, proprietor/chair, will:

- ensure that the school has an effective written anti-bullying strategy and that safeguarding and behaviour standards are met;
- receive proportionate, anonymised information about patterns, protected characteristics, sites and the effectiveness of action;
- challenge leaders where concerns recur or actions are not effective; and
- review this policy at least annually and when legislation, guidance or the school's circumstances change.

### **7.2 Site Leads/acting headteachers**

Joe Scales, Grovehill Site Lead/DDSL, and Emily Giddens, Gaddesden Site Lead/DDSL, carry the acting-headteacher function at their respective sites. They implement this policy, ensure staff understand their responsibilities, coordinate reports and transport-provider handovers, allocate resources, oversee serious or repeated concerns and ensure families receive clear reporting and complaints information.

### **7.3 Designated Safeguarding Lead**

Jennifer Bryant, DSL, will advise on child-on-child abuse and other safeguarding risks, decide when safeguarding procedures or referrals are required, own safeguarding records in CPOMS, support safe information-sharing and ensure the bullying response does not conflict with a child-protection or police process.

### **7.4 All staff**

All staff must model respectful behaviour, remain alert to changes and patterns, act on reports, make appropriate communication adjustments, record concerns promptly, share information on a need-to-know basis and follow agreed safety and support plans.

### **7.5 Parents and carers**

Parents and carers are encouraged to report concerns promptly, preserve relevant evidence, avoid public or online confrontation, work with agreed safety measures and tell the school if the behaviour continues or the response is not working.

### **7.6 Pupils**

Pupils are encouraged, with support appropriate to their understanding and communication, to seek help, report concerns about themselves or others, avoid joining in or sharing harmful content and follow agreed safety arrangements. A pupil will not be blamed for being unable to intervene safely.

## 8. Recording, monitoring and review

### 8.1 Recording

The primary record for bullying and behaviour action will be the Behaviour incident log. A concern will also be recorded on CPOMS only when it involves or may involve safeguarding, under the ownership of Jennifer Bryant as DSL. As appropriate, the record will include:

- the date, time, location and site;
- how the concern was reported and the pupil's own words or communication;
- the behaviour, repetition, power difference and impact described;
- any connection with SEND, a protected characteristic, online activity, transport or off-site conduct;
- immediate safety and safeguarding action;
- evidence considered, findings, decisions and reasons;
- reasonable adjustments and support offered;
- communication with parents, carers and professionals; and
- actions, responsible staff and review dates.

Records will be access-controlled, reviewed at closure and at the stated follow-up dates, and retained and securely disposed of under the approved retention schedule. Safeguarding information will be recorded on CPOMS only where the DSL determines that threshold is met. Duplicate records will be cross-referenced rather than copied unnecessarily.

### 8.2 Monitoring

The Site Leads/acting headteachers will review incidents at least termly, and sooner for serious or repeated concerns, for patterns by site, location, transport route, type of behaviour, protected characteristic, SEND, online or off-site context, pupils involved and recurrence. They will use the findings to improve supervision, curriculum, staff development, individual planning and partnership work.

Richard McCabe, proprietor/chair, will receive anonymised monitoring information at least annually. Urgent or serious trends will be escalated sooner.

This policy will be reviewed annually, after a serious incident where learning is identified, or sooner if legislation, statutory guidance or the school's provision changes.

## 9. Complaints and useful resources

### 9.1 Complaints

A parent or carer who is dissatisfied with the school's handling of a concern may use the school's Complaints Policy. Raising a complaint does not replace or delay safeguarding action, and a safeguarding concern may be reported directly to the appropriate external agency.

### 9.2 Concerns involving adults

Allegations that an adult has harmed, bullied or behaved inappropriately towards a pupil must be handled through the Child Protection and Safeguarding Policy, including the arrangements for allegations or low-level concerns about adults.

Concerns about bullying or harassment between adults are managed under the relevant staff, grievance, complaints or parent conduct procedures. This pupil anti-bullying policy is not a substitute for those processes.

### **9.3 Useful resources and guidance**

#### **School policies**

[Behaviour Policy](#)

[Child Protection and Safeguarding Policy](#)

[Online Safety Policy](#)

[Equality and Diversity Policy](#)

[Complaints Policy](#)

#### **Statutory and Department for Education guidance**

[Education \(Independent School Standards\) Regulations 2014](#)

[Keeping children safe in education 2026](#)

[Preventing and tackling bullying](#)

[Behaviour in schools](#)

[Searching, screening and confiscation](#)

[Equality Act 2010: advice for schools](#)

#### **Support and reporting**

[Childline](#)

[Anti-Bullying Alliance](#)

[Childnet](#)

[Report Harmful Content](#)

[Internet Watch Foundation](#)

[NSPCC](#)

[YoungMinds](#)

[Hertfordshire: report a child protection concern](#)

[Hertfordshire Local Offer: mental health and wellbeing](#)