

Each day, discovery.



ELTHAM COLLEGE

10a Anti-bullying (child on child abuse) Strategy

Last reviewed: August 2023



Version Control Information

Reason For Amendment	Name	Date	Main changes
Annual Review		August 2016	
Updated to reflect ISI guidance	Bursar	December 2016	Section 13 – legal framework. Reference to Equal Opportunities Policy as a related document.
Annual Review	Designated Safeguarding Lead	August 2017	Change of terminology ('cyber' to 'online')
Annual review	DSL	August 2018	Updated to reflect current practice
Annual review	DSL	January 2020	Updated to reflect changes in Keeping Children Safe in Education 2019
Annual review	DSL	August 2021	Updated to reflect changes in KCSIE 2021
Annual review	DSL	August 2022	Updated to reflect changes in KCSIE and government guidance on behaviour.
Annual review	DSL	August 2023	

Other Related Documents

- Online Bullying and Online Safety Policy;
- Safeguarding (and Child Protection) Policy
- Equal Opportunities policy (students)
- Keeping Children Safe in Education (2023)



1 Statement of Intent

Bullying, harassment, sexual violence and sexual harassment, victimisation and discrimination of any kind is not tolerated at Eltham College.

We treat all our students and their parents fairly and with consideration and we expect them to reciprocate towards each other, the staff and the school. The school recognises the extremely detrimental effects that bullying can have on young people's lives and takes the issue very seriously. The school treats bullying and peer on peer abuse as a safeguarding concern. An important part of the school's safeguarding work requires that all staff are vigilant for signs of bullying and peer on peer abuse and are available to students to discuss any concerns that they may have for themselves or the welfare of others. Whatever the motivation of the bullying, whether related to prejudice, ignorance or a combination of both and whatever its character; racial, sexual, religious, appearance related or other and whatever its manifestation; emotional, physical, phone, text, online bullying or other means, it is unacceptable in our school community. Difference and diversity are part of life and are valued within the school. Prejudice, discrimination and unkind teasing and name calling on such matters are unacceptable. Where there is reasonable cause to suspect that a child is suffering or is likely to suffer significant harm, this will be treated as a safeguarding and child protection concern and our safeguarding and child protection policy will be followed.

At Eltham College our community is based upon respect, good manners and fair play. We are committed to providing a safe and caring environment that is free from disruption, violence and any form of harassment so that every one of our students can develop his/her full potential, and bullying and peer on peer abuse is clearly counterproductive to this. We expect our students to treat members of staff with courtesy and co-operation so that they can learn in a relaxed but orderly atmosphere. All students should care for and support each other.

Eltham College prides itself on its respect and mutual tolerance. Parents/guardians have an important role in supporting the school in maintaining high standards of behaviour. It is essential that school and homes have consistent expectations of behaviour and that they co-operate closely together.

This policy is available to all parents who will work alongside the school to create an environment of good behaviour and respect. Helpful examples will be set by older students and staff. Success is frequently celebrated.

We are committed to support the whole school approach to reducing bullying; we all have rights and responsibilities within this framework.

We will provide opportunities for children and young people to learn how to express their feeling and concerns, i.e. in Well-being lessons, tutorial groups, through creative work.

We provide opportunities for students to learn about healthy relationships and understand what constitutes an unhealthy, controlling or abusive relationship through relationships and sex education. Staff role model positive relationships for students.

We will actively promote supporting others when they are upset or in distress in our school ethos, through the 5 Rs of our Wellbeing programme, assemblies, discussion, etc.

We promote our expectations for behaviour through the Eltham Constitution. This is reviewed annually by the Eltham Congress and ensures that the student voice is clearly represented in our expectations for conduct.



We will ask children and young people to report all incidents of, poor behaviour, bullying and interpersonal difficulties which they experience directly or which they witness. A wide range of reporting mechanisms are available to students, and these are clearly signposted and accessible to all. Students can speak to their form tutors or a member of the pastoral team, including the chaplain, school nurse and school counsellor. There is a suggestions box where written reports can be posted and an anonymous online reporting system, Whisper that can be accessed via text or the school network. Reducing bullying is everyone's responsibility and a upstander attitude is encouraged and celebrated.

This Anti-bullying (child on child abuse) Strategy which forms part of the overall Behaviour Policy and is regularly reviewed. The policy has a disciplinary aspect but also a supportive and pastoral aspect for both perpetrators and victims.

2 Aims

The aims of the strategy are:

- To prevent, de-escalate and stop any continuation of harmful behaviour;
- To react to bullying incidents in a reasonable, proportionate and consistent way;
- To safeguard the individual who has experienced bullying and to trigger sources of support;
- To apply disciplinary sanctions to the bully and ensure they learn from the experience, possibly through multi-agency support;
- To safeguard any individual who has experienced or is displaying signs of harmful sexual behaviour
- To prevent and respond to reports of sexual violence and sexual harassment and safeguard and support both the victim(s) and alleged perpetrator(s).

3 Definition of Bullying

The Government defines bullying as:

"Behaviour by an individual or group usually repeated over time, that intentionally hurts another individual or group either physically or emotionally.

Bullying includes: name-calling; taunting; mocking; making offensive comments; kicking; text messaging and emailing; sending offensive or degrading images by phone or via the internet; producing offensive graffiti; gossiping; excluding people from groups; spreading hurtful and untruthful rumours. Although sometimes occurring between two individuals in isolation, it quite often takes place in the presence of others."

Bullying exists when there is an imbalance of power – when a student or group of students repeatedly attempts to hurt, humiliate or exclude another, less powerful student. Bullying can take place in person and/or online. Staff understand that for young people there is no distinction between the online and the offline world.

Bullying can seriously damage a young person's confidence and sense of self-worth, and they will often feel that they are at fault in some way. It can lead to serious and prolonged emotional damage for an individual. Those who conduct the bullying or witness the bullying can also experience emotional harm, and the impact on parents and school staff can be significant.

Students are bullied for a variety of reasons and may be prejudice-related, for example:



- Bullying related to race, religion or culture;
- Bullying related to special educational needs (SEN) or disabilities;
- Bullying related to appearance or health conditions;
- Bullying related to sexual orientation or identity;
- Bullying of young carers or looked after children or otherwise related to home circumstances;
- Sexist or sexual bullying.

There is no “hierarchy” of bullying – all forms of bullying should be taken equally seriously and dealt with appropriately.

Bullying can take place between students, between students and staff, or between staff; by individuals or groups; face-to-face, indirectly or using a range of online bullying methods. This guidance provides an overall framework for the school in managing all types of bullying behaviour. It links to separate advice on more specific types of bullying.

This policy is intended to deal primarily with support for students. If a member of staff is experiencing bullying, they should contact the HR Manager, who will assist with informal strategies and/or the application of the school disciplinary and grievances procedures as appropriate.

4 Bullies and the Bullied

Students may be reluctant to report bullying for fear of repeat harm and because of a concern that “nothing can be done”. It is therefore important that the school shows that we can support students to prevent harm, that bullying is not tolerated, and that there are solutions which work.

Students are also reticent to come forward because of being called a ‘snake’. This name calling or hissing at the victim or friend who has reported bullying will be taken seriously and will be sanctioned.

Students may not report bullying because they may feel it is something within them which is at fault. Students therefore need to receive a clear message from the school that nobody ever deserves to be bullied.

The way that a school deals with the bullying of staff by students will also have an impact on the confidence of students to report bullying – it is important that the school demonstrate that bullying is a whole school issue and that the bullying of any member of the school community will be taken seriously and dealt with effectively.

Students with learning disabilities or communication difficulties may not understand that they are being bullied or may have difficulty in explaining that they are being bullied. School staff should look out for signs of bullying and act if they suspect a child is being bullied:

- The ring-leader or instigator, the person who through their social power can direct bullying activity;
- Assistants/associates, who actively join in the bullying (sometimes because they are afraid of the ring-leader or instigator);
- Reinforcers, who give positive feedback to the bully, perhaps by smiling or laughing;
- Outsiders/bystanders, who stay back or stay silent and thereby appear to condone or collude with the bullying behaviour;



- Defenders/ upstanders, who try and intervene to stop the bullying or comfort students who experience bullying.

It should be noted, however, that the same student can adopt different roles at different times, or indeed at the same time (a bullied student might be bullying another child at the same time, or a seeming “reinforcer” might become a “defender” when the ring-leader is not around).

Some students may be more vulnerable than others. It is important that the school is sensitive to students who because of their behaviours or circumstances may be vulnerable. Deteriorating attendance, poor punctuality, lack of progress and diminishing achievement can be indicators that the student is vulnerable in some way and susceptible to – or suffering already from – bullying.

Students being bullied may also demonstrate emotional and behavioural problems, physical problems such as headaches and stomach pains, or signs of depression. Bullying is a deeply damaging activity, for both the person being bullied and the person conducting the bullying, and its legacy can follow young people into adulthood.

Early identification of students at risk can help schools, enabling them to develop more effective strategies for responding to, and preventing, incidents. Induction meetings and other processes can be used to help identify specific needs or likely concerns so these can be taken into account when schools develop their anti-bullying strategies.

Some bullying behaviour by students is linked to deeper issues. As should be the case when responding to those who are bullied, understanding the emotional health and wellbeing of these students is key to selecting the right strategies and to engaging the right external support where this is needed (for example, in relation to issues of domestic violence or other safeguarding issues). Students displaying harmful sexual behaviour (HSB) have often experienced their own abuse and trauma and this will be treated in a safeguarding context.

5 Signs of Bullying

Changes in behaviour that may indicate that a student is being bullied include:

- Unwillingness to return to school;
- Displays of excessive anxiety, becoming withdrawn or unusually quiet;
- Failure to produce work, or producing unusually bad work, or work that appears to have been copied, interfered with or spoilt by others;
- Books, bags and other belongings suddenly go missing, or are damaged;
- Change to established habits (e.g. giving up music lessons, change to accent or vocabulary);
- Diminished levels of self-confidence;
- Frequent visits to the Medical Centre with symptoms such as stomach pains, headaches;
- Unexplained cuts and bruises;
- Frequent absence, erratic attendance, late arrival to class;
- Choosing the company of adults;
- Displaying repressed body language and poor eye contact;



- Difficulty in sleeping, experiences nightmares;
- Talking of suicide or running away.

Although there may be other causes for some of the above symptoms, a repetition of, or a combination of these possible signs of bullying should be investigated by parents and teachers.

Children with SEND are three times as likely to be abused than their peers and additional barriers can sometimes exist in recognising abuse in SEND children such as communication difficulties. The DSL/ DDSL and SENDCO liaise closely over any reports of peer on peer abuse that involve SEND students.

6 Child on child sexual violence and harassment

The School seeks to educate all students on consent and healthy relationships through the curriculum and through application of the RSE policy. While not all sexualised behaviour between children and young people is bullying or abuse and children do engage in sexual play and experimentation that is age appropriate, staff are trained to maintain an attitude of 'it could happen here', are able to recognise the signs of harmful sexual behaviour, sexual abuse and sexual harassment and are aware of its safeguarding implications.

The presence of one or more of the following points in situations where there has been sexual activity between children should always trigger some concern and should be reported to the DSL or DDSL:

- There is an age difference of two years or more between the children;
- One of the children is significantly more dominant than the other;
- One of the children is significantly more vulnerable than the other e.g. in terms of disability, confidence, physical strength;
- There has been some use of threats, bribes or coercion to secure compliance or to maintain secrecy;
- Whether the alleged perpetrator has repeatedly tried to harm one or more other children.

Sexual harassment is a form of bullying that can take place online and offline. It can happen both inside and outside of school. Examples of sexual harassment can include:

1. Sexual comments, taunts, and threats, use of sexualised and sexist language.
2. Non-consensual physical contact (this can include hugging and kissing); interfering with clothing
3. Upskirting. This is a criminal offence
4. Sharing of nudes. (Consensual sharing of images, especially between children of a similar age might not be abusive and might require a different response, but students are still taught that it is illegal. Non-consensual image sharing is illegal and abusive)
5. Spreading rumours about another person's alleged sexual activity.
6. Pressure to be in a relationship with another person

Child on child sexual violence can and does happen. When referring to sexual violence we refer to sexual offences under the Sexual Offences Act 2003 which includes rape, assault by penetration, sexual assault and causing someone to engage in sexual activity without consent.



7 Procedures for managing reports of sexual harassment and sexual violence

Reports of sexual harassment and sexual violence are taken seriously and treated as safeguarding issues in line with our safeguarding and child protection policy. There is a zero tolerance approach to sexual violence and harassment. Staff recognise that to downplay sexual harassment or to fail to challenge it creates a culture that can normalise inappropriate behaviours and provide an environment that may lead to sexual violence. It is never passed off as 'banter' or 'part of growing up'.

Any child on child abuse allegation of sexual harassment or sexual violence is immediately referred to the Designated Safeguarding Lead (DSL) or Deputy DSL. The member of staff to whom the disclosure has been made will listen to the account with sensitivity and will not make any judgements. The account will be recorded on CPOMS immediately afterwards and the school's safeguarding procedure will be followed. The DSL/ Deputy DSL will make decisions on a case by case basis, in line with the safeguarding and child protection policy, using their professional judgement and being supported by children's social care and the police as required. Steps outlined in Keeping Children Safe in Education will be followed.

The interests and wishes of the victim and their safety will be the paramount concern. Any victim of child on child sexual violence or sexual harassment will be offered as much support and protection as required through one or more of the options available to the school, including the help of specialised external agencies. Perpetrators will be protected, supported and disciplined as appropriate. Support and sanction can happen simultaneously.

8 Preventative Measures

- Effective school leadership that promotes an open and honest anti-bullying ethos;
- Use of appropriate assemblies to explain the school policy on bullying. The promotion of the 5Rs through our Wellbeing programme give students an awareness of their social and moral responsibilities as they progress through the school. The programme is structured to enforce the message about community involvement and taking care of each other;
- Our Anti-bullying ambassadors and Change Makers work with the Head of Wellbeing and Deputy Head to develop anti-bullying initiatives and raise awareness of current issues;
- All our students are encouraged to tell a member of staff at once if they know that bullying is taking place.
- A range of reporting mechanisms are in place to encourage students to come forward: students are signposted to staff in all sections of the school, an anonymous online reporting system called Whisper can be accessed via text or the school Sharepoint site and a suggestions box is available for students to leave handwritten or typed messages should they not wish to speak to anyone or use the online system;
- All victims are reassured that they are being taken seriously and that they will be supported and kept safe. Nobody is ever made to feel ashamed for making a report or that their experience is minimized.



- All reported incidents are recorded and investigated at once. Our safeguarding recording system, CPOMS allows for effective communication and monitoring of reported incidents and analysing of data with a view to tracking and dealing with trends of behaviour;
- All incidences of a student being called a 'snake' will be dealt with as a serious behavioural incident;
- We have a strong and experienced team of Tutors, Heads of Year, and Heads of Section who work alongside staff in the Foxbury Team to support the DSL and are trained in handling any incidents as an immediate priority, and are alert to possible signs of peer or peer abuse and bullying;
- Our pastoral team gives support and guidance to other staff on handling and reporting incidents, and on the follow-up work with both victims and bullies;
- Where appropriate, peers are used in the support of victims;
- Our Lead Nurse is always available to offer support and our trained school counsellor is available should the skills of specialist counselling and assessment be required.
- The Chaplain will give support and guidance to students of all faiths who are able to refer themselves to him. He will provide advice and seek to encourage the development of tolerance, understanding and respect for others in a multi-faith community;
- Staff are always on duty at times when students are not in class and patrol the school site, particularly areas where bullying might occur. They are trained to be alert to inappropriate language or behaviour;
- Our Medical Centre and other key notice boards display advice on where students can seek help, including details of confidential help lines and web sites connecting to external specialists, such as Childline;
- Regular student surveys on bullying and peer on peer abuse enable the pastoral teams to monitor trends and respond to issues in a timely fashion;
- We operate Sixth Form Prefects and Peer Mentoring schemes, whereby trained older students are encouraged to offer advice and support to younger students;
- We provide leadership training to our Prefects which specifically covers the importance of offering support and assistance to younger and to vulnerable students;
- We have banned initiation ceremonies designed to cause pain anxiety or humiliation;
- We reserve the right to investigate incidents that take place outside school hours, on school visits and trips and that occur in the vicinity of the school, involving our students. Peer on peer abuse that takes place online or outside of school is treated as seriously as that which takes place in school;
- We welcome feedback from parents and guardians on the effectiveness of our preventative measures;
- We recognise that a whole school and whole curriculum approach to developing social and emotional skills in areas such as empathy and the management of feelings, is also highly relevant to reducing bullying;

9 Procedures for Dealing with Reported Bullying

If an incident of bullying is reported, the following procedures are adopted:



- The member of staff to whom it was reported or who first discovers the situation, will control the situation, reassure and support the students involved;
- He/she will inform the form tutors and an appropriate member of the pastoral team as soon as possible by recording the incident on CPOMS and alerting the tutor and Head of Year.
- The form tutor/member of the pastoral team will speak to the victim at the earliest opportunity. The victim will be reassured and the situation will be investigated thoroughly and carefully. All those involved will be given an opportunity to put forward their point of view and will speak to an appropriate member of staff. The incident log will be updated on CPOMS and the necessary actions recorded;
- Parents of all students will be informed that a report of bullying has been made and will be kept abreast of how we have dealt with the incident.

Managing the incident

- The instigator will be spoken to at a later stage by a member of the pastoral team, separately from the victim. S/he will be asked to provide a full account of the incident(s) from their perspective and they will be encouraged to think about the impact of their behaviour and why it was inappropriate and caused distress. He/she will be offered guidance on modifying his or her behaviour, together with any appropriate disciplinary sanctions. Sanctions will be fair, proportionate and contextualized and will take into account any specific needs or vulnerabilities of the instigator;
- In serious incidents, the Deputy Head (pastoral) will be informed;

Sanctions have three main purposes, namely to:

- Impress on the instigator that what he/she has done is unacceptable;
- Deter him/her from repeating that behaviour; and
- Signal to other students that the behaviour is unacceptable and deter them from doing it.

Sanctions for bullying are intended to hold students who bully to account for their behaviour and ensure that they face up to the harm they have caused and learn from it. They also provide an opportunity for the student to put right the harm they have caused.

Sanctions range from detention to suspension, and eventually, permanent exclusion.

In all cases

- The pastoral team will use their judgement in determining whether a sanction should be applied alongside the use of an anti-bullying team.
- Parents will be engaged with and their support sought. If a student is to be sanctioned, in most cases, parents will be contacted by telephone in the first instance and invited in if this is considered appropriate.
- All bullying incidents are recorded on CPOMS. Sanctions are recorded on iSAMS.

10 Reporting Arrangements for Parents

Parents are frequently the ones to report bullying incidents to the school.



- Reception staff and other staff taking phone messages, notes or receiving visitors have been trained in school systems and procedures and are clear about steps to be taken;
- Reception and other staff are sensitive to the emotional needs of parents making contact with a school about incidents of bullying;
- Parents have confidence that staff will act promptly, take the concern seriously and not take action which make the situation worse for their child;
- Staff will ensure parents are kept informed of actions, as appropriate.
- If parents do not feel that their concerns have been properly addressed, they should contact the Deputy Head (pastoral).

We have a partnership with Family Lives and parents can contact their helpline (0808 800 2222) for further advice on helping their child to deal with bullying. The Bullying UK website: www.bullying.co.uk has more guidance and parents are signposted to this.

Recording – Data Collection Management

The school will record all incidents of bullying on its Child Protection and Online Management System (CPOMS). The purpose of recording incidents is to enable the gathering of information on the number and nature of bullying incidents and to identify any developing trends. The data will also enable the school to promote the welfare of students.

Keeping records of bullying incidents will enable the school to:

- Manage individual cases effectively;
- Monitor and evaluate the effectiveness of strategies;
- Celebrate the anti-bullying work of the school;
- Demonstrate defensible decision-making in the event of complaints being made;
- Engage and inform multi-agency teams as necessary.

Bullying data can be used to:

- Provide monitoring reports to students (through the school council, for example) and staff;
- Create evaluation reports for:
 - Students, parents and staff in order to demonstrate openness and to celebrate progress; and
 - Governors in order for them to monitor the anti-bullying work of the school;
- Inform the evidence presented in the school Self-Evaluation form (SEF), which forms a key part of the evidence for ISI's inspection of schools.

11 What sort of data is collected and used?

- The date and type of the incident;
- Information on what action the school took and the impact this had on the bullying;
- A range of data from student surveys including quantitative data and perception data;



- Records of peer mentoring initiatives;
- Parental complaints to the school regarding bullying;
- Records of the Educational Welfare Service identifying where bullying is a factor in non-attendance at school;
- Exclusions' data related to bullying;
- Transfer and admissions' data, specifically requests for transfer due to bullying or harassment;
- Data from ISI.

12 Legal framework

The legal framework around anti-bullying stems from Independent School Standards Regulations (ISSRs) obligations to meet certain standards in protecting the welfare, health and safety of students – including a requirement to ensure that bullying at the school is prevented in so far as reasonably practicable, by the drawing up, publication and implementation of an effective anti-bullying strategy.

In addition, independent schools have a legal duty to uphold the law on equal opportunities for pupils and staff alike. Under paragraph 3 of the ISSRs (quality of education provided) teaching at the school must not discriminate against pupils contrary to part 6 of the Equality Act 2010. In addition, as of January 2015, paragraph 5 of the ISSRs (spiritual, moral, social and cultural development of pupils) requires schools to ensure that principles are actively promoted which... (vi) encourage respect for other people, paying particular regard to the protected characteristics under the Equality Act 2010.

13 Guidance to Schools

This document provides guidance specifically on the anti-bullying aspects of the above legal requirements. Guidance on other aspects can be obtained from *Preventing and Tackling Bullying 2017* (DfE), Cyber-bullying advice for headteachers and school staff (DfE) and *Behaviour in Schools July 2022* (DfE).