



Anti-bullying Policy

POLICY STATEMENT

Clifton College does not tolerate any form of bullying against pupils or staff. We believe that everyone has the right to live and work at Clifton without fear of harassment and intimidation by other individuals or groups and we aim to provide an environment in which staff and pupils feel happy and safe. We celebrate individual differences and aim to develop each person's talents and abilities.

SCOPE

This is a cross-College policy for pupils. The whole College community is made aware of ways of reporting incidents of bullying.

AIMS AND OBJECTIVES

The aim of this policy is:

- To create and maintain an atmosphere of tolerance, co-operation and mutual respect in which bullying is seen to be unacceptable
- To be vigilant and to deal with incidents appropriately and swiftly
- To protect and safeguard pupils in their use of ICT and e-technology
- To raise awareness of and counter instances of cyberbullying
- To support all parties who are involved in bullying incidents
- To have strategies to deal with bullying as it occurs
- To provide time for reflection and discussion of the policy and offer INSET when needed

LEGISLATION AND GUIDANCE

- Preventing and Tackling Bullying Advice for Headteachers, Staff and Governing Bodies (July 2017)
- Keeping Children Safe in Education
- Working Together to Safeguard Children (2023)
- The Equality Act 2010
- Guidance for safer working practice for those working with children and young people in education settings (Safer Recruitment Consortium, February 2022)
- UKCIS and Department for Digital, Culture, Media and Sport guidance, [*Sharing nudes and semi-nudes: advice for education settings working with child*](#)
- What to do if you're worried that a child is being abused (March 2015)

ROLES AND RESPONSIBILITIES

Housemasters and Housemistresses (Upper School and Prep) or the member of staff who has the trust of the pupil (Pre-Prep) will:

- Initiate and undertake investigations
- Keep a written record of individuals consulted and actions taken



- Take written statements from those involved
- Report incidents on CPOMS
- Inform parents of any proposed disciplinary action
- Following up incidents and communication with staff, pupils and parents as necessary

The Deputy Head (Pastoral) will:

- Assist the HoM with the investigation and following up incidents where required
- Liaise with other HoMs, the Deputy Heads (Academic), Heads and other agencies as necessary

Other staff members are responsible for:

- Role modelling good behaviour
- Supporting anti-bullying strategies and initiatives
- Assisting with investigations and following up incidents as necessary

Pupils are responsible for:

- Reporting incidents to their HoM or other member of staff or via 'We listen'

The Deputy Head of the Pre-Prep has particular responsibility for children in the Early Years Foundation Stage.

LINKS WITH THE CURRICULUM

The promotion of the values of tolerance and teamwork permeate every aspect of education at Clifton. More specifically, pupils have a chance to discuss bullying as part of the PSHE programme of study.

RELATED POLICIES AND DOCUMENTS

- Rewards and Sanctions Policy
- School Rules
- Pupil Mobile Phone Policy
- Online Safety Policy
- IT Acceptable Use Agreement
- Safeguarding and Protecting Children Policy
- Searching and Confiscation Policy and Guidance

DISSEMINATION AND IMPLEMENTATION

All members of the teaching staff share a responsibility for the implementation of the College's Anti-bullying Policy. Behaviour expectations are made clear to pupils through School Rules and a copy of the policy is published on the College website.

MONITOR AND REVIEW

This policy is regularly monitored to ensure that it is working as effectively as possible. It will be reviewed annually and at other times in the intervening period as necessary.



Anti-bullying Procedures

WHAT IS BULLYING?

“Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages, social media or gaming, which can include the use of images and video) and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, special educational needs or disabilities, or because a child is adopted, in care or has caring responsibilities. It might be motivated by actual differences between children, or perceived differences.” - DfE Preventing and tackling bullying (July 2017)

Ofsted defines bullying as “aggressive or insulting behaviour by an individual or group, often repeated over time, that intentionally hurts or harms.” Perpetrators and victims may include adults as well as children. Bullying may take a number of different forms, the principal ones being verbal and cyber bullying, physical and manipulative. Perception of the situation by the victim may be distorted, but the experience is very painful and difficult to defend against.

A new definition¹ (April 2025) which is inclusive of SEND pupils’ experiences:

Bullying definition: Bullying involves a pattern of behaviour repeated over time, from the same or different people, and in the same or different methods. It can take many different forms, including physical contact, words, mean gestures, exclusion from a group or negative contact via digital device or platform. It involves an imbalance of strength or power, including age, strength, size, intellectual capacity, social skill understanding and emotional stability. The victim has difficulty defending themselves or is unaware of being bullied. Harm is being inflicted intentionally.

Counter-connecting definition: Involves a pattern of behaviour repeated over time. Can occur peer-to-peer but also between pupils and teachers. Can take many different forms, including physical contact, words, mean gestures, exclusion from a group, or negative contact via digital device or platform. An act that causes unintentional victimisation of another. There is a victim. Harm may be inflicted unintentionally.

Differentiating between counter-connecting and bullying is crucial for educators and parents. If a child's behaviour is labeled as bullying when it's actually counter-connecting, the response might be punitive and ineffective. However, if the behaviour is identified as a failed attempt at connection, the approach can shift to teaching the child better social and emotional skills.

1

https://nasenjournals.onlinelibrary.wiley.com/doi/epdf/10.1111/1467-9604.70006?domain=p2p_domain&toKen=CDTRGAHW4QTZVTSUSS58



It is important to note, however, that a situation may occur when both bullying and counter-connecting are at play from different individuals targeting the same person at the same time.

Bullying often focuses on individual differences. In this respect it undermines the College's work in promoting tolerance and understanding in the community. Bullying may seize upon aspects of physical shape or appearance, or focus on parental, cultural or ethnically-based lifestyles. It may dwell upon race, religion, sexuality or nationality. Sexual bullying may involve misogyny or homophobia, or focus on alleged sexual attractiveness or lack of it.

Research suggests that a large number of incidents of intimidating behaviour such as name-calling or "dirty looks" actually take place in classrooms when the teacher is present. This emphasises the need for constant awareness and vigilance by staff.

Signs of bullying may include changes in behaviour such as: becoming shy and nervous, taking unusual absences or clinging to adults, anxiousness about coming to school or fear of lessons; a request to change study, dormitory or class; deterioration of academic work; books, clothes or other possessions missing, damaged or destroyed, unexplained physical injuries; sitting or eating alone; being late for school; a refusal to say what is wrong.

Cyberbullying is a 'method' of bullying, rather than a 'type' of bullying. It includes bullying via text message, via instant-messenger services and social networking sites, via email, and via images or videos posted on the Internet or spread via mobile phone. It can take the form of any of the previously discussed types of bullying, i.e. technology can be used to bully for reasons of race, religion, sexuality, disability, etc.

Verbal and **cyberbullying** may involve name calling or "banter", make use of written and voice notes, e-mails, mobile telephone messages or postings on social networking websites and may include threats of physical violence.

Physical bullying often consists of deliberate jostling, bumping, pushing or shoving. Those responsible often maintain that it is accidental when it first comes to light. It is a criminal offence where it involves assault, actual bodily harm, or wounding. It may involve theft or damage to property, accompanied by the threat of violence or by the abuse of power.

Manipulative bullying manipulates social networks with the intention of insulting, excluding, ostracising or marginalising individuals from their friends and normal relationships. It may involve the spreading of rumours or malicious accusations.

In accordance with the College's Code of Conduct for Staff who Work with Children and Young People, members of staff are asked to set an example of respect, kindness and courtesy, to ensure that proper discipline is maintained and to help to monitor all areas of the school. Staff should be vigilant about the location and the geography of bullying and aim to promote an open and honest anti-bullying ethos across the school at all times. Reported incidents should be dealt with promptly, with relevant staff being informed, as applicable. We ask parents to support this policy and to assist by reporting incidents or bringing their concerns to us at an early stage.



CHILD ON CHILD ABUSE (Including Sexual Violence and Sexual Harassment between children)

It is very important for all staff to recognise that children are capable of abusing their peers (including online). Clifton College has a zero-tolerance approach to abuse. It should never be passed off as “banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

The conduct of pupils towards each other will, in most instances, be covered by the College's Behaviour Policies. However, some behaviour by a pupil towards another may be of such a nature that safeguarding concerns are raised.

Child on child abuse rarely takes place in isolation and can often indicate wider safeguarding concerns that are linked to other things that are happening in a child's life and/or the spaces in which they spend their time. This is known as extra familial harm, which simply means that assessments of children should consider whether wider environmental factors are present in a child's life that may be a threat to their safety and/or welfare. All staff, but especially the DSL or Deputy Head Pastoral should be considering the context within which such incidents and/or behaviours occur. Research has also shown that many children who present with harmful behaviour towards others, in the context of child on child abuse, are themselves vulnerable and may have been victimised by peers, parents or adults in the community prior to their abuse of peers. Children's Social Care should be informed of all such information to allow any assessment process to consider all the available evidence and the full context of any abuse.

Child on child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate). Child on child abuse can take various forms, including (but not limited to):

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment (see Part five of KCSIE);
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery) Including images produced or manipulated by Artificial Intelligence - see section below;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and
- initiation/hazing type violence and rituals.



All staff should be alert to the well-being of pupils and to signs of abuse, and should engage with these signs, as appropriate, to determine whether they are caused by child on child abuse. Signs that a child may be suffering from child on child abuse can also overlap with those indicating other forms of abuse (see the College's Safeguarding and Protecting Children Policy for further details on the indicators of abuse). Any child can be vulnerable to child on child abuse due to the strength of peer influence during adolescence.

Sexual violence and sexual harassment between children

The College has a zero-tolerance approach to sexual violence and sexual harassment. It is never acceptable and will not be tolerated. Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. All reports and concerns, including those outside the College or online will be taken seriously by the College and those affected will be offered appropriate support. All victims will be reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Staff should be aware that some groups of individuals are potentially more at risk of peer on peer sexual violence – for example evidence shows that girls, children with SEND and LGBTQ+ children are at greater risk.

Harmful sexual behaviour

Harmful sexual behaviour is an umbrella term that includes sexual violence and sexual harassment. Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). When considering HSB, ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma and should be offered appropriate support.

Harmful sexual behaviour, like all child on child abuse, is never acceptable and will be taken seriously.



Sexual harassment

Sexual harassment refers to ‘unwanted conduct of a sexual nature’ that can occur online and offline and both inside and outside of school/college. Child on child sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (This may also constitute sexual violence) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. This may include:
 - consensual and non-consensual sharing of nude and semi-nude images and videos - see section below; including those produced or manipulated by Artificial Intelligence
 - sharing of unwanted explicit content, including content produced or manipulated by Artificial Intelligence - see section below;
 - upskirting;
 - sexualised online bullying;
 - unwanted sexual comments and messages, including, on social media;
 - sexual exploitation; coercion and threats.

All cases of sexual harassment must be challenged. If not challenged, inappropriate behaviours can be normalised and provide an environment that may lead to sexual violence.

Sexual violence

References to **sexual violence** are references to sexual offences under the Sexual Offences Act 2003, specifically:

- Rape;
- Assault by Penetration;
- Sexual Assault; and
- Causing someone to engage in sexual activity without consent.

PREJUDICE-BASED BULLYING

Bullying behaviour may be a result of prejudice that relates to perceived or actual differences.



This can lead to prejudice and discriminatory language or behaviour, including racism, sexism, homophobia, biphobia or transphobia.

[Respect for All](#) states: “Prejudice-based bullying is when bullying behaviour is motivated by prejudice based on an individual’s actual or perceived identity; it can be based on characteristics unique to a child or young person’s identity or circumstance.”

Research shows that anti-bullying work that clearly addresses the particular needs of vulnerable or minority groups is more effective. There is a need to address the root cause of prejudice as well as effectively responding to incidents as they arise. At Clifton College we strive to create an environment where diversity is celebrated and name calling and comments based on prejudice are challenged. Some personal characteristics are protected within the law, to address the years of unfavourable treatment experienced by some groups. The Equality Act 2010 makes it unlawful to discriminate against people with a ‘protected characteristic’. These are:

- Age
- Disability
- Gender reassignment
- Pregnancy and maternity
- Marriage and civil partnership
- Race
- Sex
- Religion or belief
- Sexual orientation

CYBERBULLYING

Visual evidence after cyberbullying has taken place should be retained and pupils should be encouraged to pass the evidence to a member of staff or their parents. In some cases, it will be necessary to contact mobile phone companies, Internet service providers or social networking sites. Members of the IT staff can help in this regard.

The Education Act 2011 amended the power in the Education Act 1996 to provide that when an electronic device, such as a mobile phone, has been seized by a member of staff who has been formally authorised by the Head, that staff member can examine data or files, and delete these, where there is good reason to do so. This power applies to all schools and there is no need to have parental consent to search through a young person’s mobile phone.

The following advice should be given to those experiencing cyberbullying:

- Not to retaliate or reply but retain the evidence.
- To block or remove offenders from buddy lists.
- To review the information given out.
- To make sure to tell a trusted adult.
- To keep calm and not to let the bully see a reaction.



If the person responsible for the bullying is identified, sanctions will be applied under the College's Rewards and Sanctions Policy.

In addition to the sanctions outlined in the College's Rewards and Sanctions Policy, the following additional sanctions might be implemented, depending upon the nature and severity of the bullying:

- Restricting access to equipment such as mobile phones.
- Withdrawing access to the Internet for a set period of time.
- Limiting use of the Internet for a set period of time.
- Contacting the police, CEOP.
- Where the cyberbullying is sufficiently severe, informing external agencies such as social networking or email member sites.

Support will be provided for the victim. This may include meeting the bully to discuss what has happened and agreeing a way forward. It is important that all children and staff recognise that when an incident of 'cyberbullying' takes place it is dealt with swiftly.

E-MAILING AND INSTANT MESSAGING

Pupils should never reply to unpleasant or unwanted emails and should not open files from people they do not know. They should also not open files which have been sent to them in error and in these circumstances they should contact their HoM, a member of the IT Department or a member of SLT to report the incident. When writing e-mails or instant messages, pupils are taught to think carefully about the content. Pupils are taught that when angry or distressed, they might send something likely to cause further anguish; on these occasions they should leave the computer and discuss the issue with someone else.

CONSENSUAL AND NON-CONSENSUAL SHARING OF NUDES AND SEMI-NUDE IMAGES AND/OR VIDEOS (also known as sexting or youth produced sexual imagery)

This policy uses the term 'sharing nudes and semi-nudes' to mean the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline.

The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents including any images produced or manipulated by Artificial Intelligence. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

Many professionals may refer to 'nudes and semi-nudes' as:

- youth produced sexual imagery or 'youth involved' sexual imagery indecent imagery. This is the legal term used to define nude or semi-nude images and videos of children and young people under the age of 18;



- 'sexting'. Many adults may use this term, however some young people interpret sexting as 'writing and sharing explicit messages with people they know' rather than sharing images;
- image-based sexual abuse. This term may be used when referring to the non-consensual sharing of nudes and semi-nudes
- Terms such as 'revenge porn' and 'upskirting' are also used to refer to specific incidents of nudes and semi-nudes being shared.

Staff should be aware of the dangers posed to children and young people in relation to sharing nudes and semi-nudes images and videos. The College treats all such incidents as safeguarding matters to be actioned in accordance with this policy. Members of staff should not view any youth produced sexual imagery which is reported to them, or copy, print or share the images under any circumstances. In referring to any incident of sharing nudes and semi-nudes images and videos, members of staff should describe the content of the images as reported to them.

Staff should report any concerns regarding sharing nudes and semi-nudes images and videos immediately to the DSL. Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive.

The DSL may, in exceptional circumstances, view images with the prior approval of the Head of College and only where:

- it is the only way to make a decision about whether to involve other agencies because it is not possible to establish the facts from any child or young person involved;
- it is necessary to report it to a website, app or suitable reporting agency (such as the IWF) to have it taken down, or to support the child or young person or parent or carer in making a report;
- it is unavoidable because a child or young person has presented it directly to a staff member or nudes or semi-nudes have been found on an education setting's device or network.

If it is necessary to view the imagery then the DSL should:

- never copy, print, share, store or save them; this is illegal. If this has already happened, please contact your local police for advice and to explain the circumstances;
- discuss the decision with the Head of College;
- make sure the viewing takes place with another member of the safeguarding team; This staff member does not need to view the images.
- wherever possible, make sure viewing takes place on the premises of the education setting, ideally in a member of the senior leadership team's office;
- make sure wherever possible that they are viewed by a staff member of the same sex as the child or young person in the images;



- record how and why the decision was made to view the imagery in the safeguarding or child protection records, including who was present, why the nudes or semi-nudes were viewed and any subsequent actions. Ensure this is signed and dated and meets any appropriate wider standards e.g. such as those set out in statutory safeguarding guidance and local authority policies and procedures;

Any member of staff who views an indecent image should be given appropriate support.

If any devices need to be taken and passed onto the police, the device(s) should be confiscated and the police should be called. The device should be disconnected from Wi-Fi and data, and turned off immediately to avoid imagery being removed from the device remotely through a cloud storage service. The device should be placed in a secure place, for example in a locked cupboard or safe until the police are able to come and collect it.

If the school has decided that other agencies do not need to be involved, then consideration should be given to deleting nudes and semi-nudes from devices and online services to limit any further sharing.

In most cases, children and young people should be asked to delete the imagery and to confirm that they have deleted them. They should be given a deadline for deletion across all devices, online storage or social media sites. They should be reminded that possession of nudes and semi-nudes is illegal. They should be informed that if they refuse or it is later discovered they did not delete the imagery, they are continuing to commit a criminal offence and the police may become involved.

If images have been shared online and cannot now be deleted by the person who shared them, the College should consider reporting the images to the relevant web host or service provider (if an option is provided), or contacting the Internet Watch Foundation or ChildLine (if the website does not provide this option).

Any decision to search a child or young person's device and delete imagery should be based on the professional judgement of the DSL (or equivalent) and should always comply with the safeguarding or child protection policy and procedures of the education setting. All of these decisions need to be recorded, including times, dates and reasons for decisions made and logged in the safeguarding records. Parents and carers should also be informed unless this presents a further risk to any child or the young person.

Where a pupil receives unwanted images, the College should advise the pupil and their parents of options that may be available to block the sender or to change the pupil's mobile phone number or email address.

For further information of support agencies and further information on how to respond to incidents, staff can refer to UKCIS and Department for Digital, Culture, Media and Sport guidance, [Sharing nudes and semi-nudes advice for education settings working with children](#)



MINIMISING THE RISK OF CHILD ON CHILD ABUSE

Clifton College actively seeks to raise awareness of and prevent all forms of child on child abuse by:

- training staff on how to; recognise signs of child on child abuse, manage disclosures and report such incidents in accordance with this policy and its procedures
- educating children about the nature and prevalence of child on child abuse via PSHE and the wider curriculum;
- having robust anti-bullying procedures in place (see also the College's Anti-bullying Policy) and pupils are taught at all stages of the College about acceptable behaviour and how to keep themselves safe;
- encouraging staff and volunteers that all child on child abuse issues are reported as safeguarding concerns in accordance with the procedures in this policy to enable the DSL to identify and address any concerning trends and identify pupils who may need additional support;
- challenging the attitudes that underlie such abuse (both inside and outside the classroom);
- working with members of Council, Senior Leadership Team, all staff and volunteers, pupils and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the College community;
- creating conditions in which pupils can aspire to and realise safe and healthy relationships;
- creating a culture in which pupils feel able to share their concerns openly, in a non-judgmental environment, and have them listened to; and
- responding to cases of child on child abuse promptly and appropriately.

PREVENTION

Listening: There are many opportunities for Clifton pupils to be heard. The “Who Can I talk to?” poster, which is displayed around school buildings and in Houses, provides all students with clear guidance on where to seek support.

Feedback: Periodically, from Year 4 onwards, we receive pupils’ feedback via a confidential questionnaire. Notices in Houses and at the back of the Upper School Booklet and the Preparatory School Prep Diary remind pupils to whom they might talk (or write) if they feel unhappy or anxious. Pupils are able to use We Listen (an online confidential reporting tool) to raise any concerns.

Counselling: Counselling can play an important part in supporting both the victim and the perpetrator of bullying. The Health Centre has a Student Wellbeing team which includes youth workers and trained counsellors with whom pupils can talk to.

Education: Use of curriculum opportunities, such as the College’s PSHE programme, to discuss issues related to Human Rights, moral responsibility and for drawing out anti-bullying messages. Weekly assemblies, Chapel addresses and tutor/mentor groups provide further reinforcement and opportunities for discussion. In addition, both the



Preparatory and Upper School may deliver age-related initiatives that aim to address specific issues.

Training: Members of staff receive regular updates on Safeguarding. The Praepostors in the Upper School also receive Safeguarding training.

DEALING WITH INCIDENTS

The outcome that is sought is understanding and a change of behaviour. Immediate action will be taken where there is clear evidence that bullying has taken place; sanctions may or may not be appropriate, depending on the circumstances.

Investigation will usually start with the HoM (at Pre-Prep level it may be appropriate for a member of staff who has the trust of the child to initiate the investigation), who will talk to individuals and/or groups. Pupils will always be allowed to state their opinions and feelings.

If a search is required then the policy and guidance on searching and confiscation should be followed.

A written record is kept and written statements should be taken from those involved. These will be reported on CPOMS <https://cliftoncollege.cpoms.net> to the HoM, DSL, DDSL and other linked staff.

If there is evidence that the incident is sufficiently serious to require discipline at a school level, parents will be informed and investigation may continue with the Deputy Head (Pastoral) and HoM.

Any sanction that is applied will depend on the severity and history of the incident(s) and might involve any of the range of measures which are available.

The Deputy Head (Pastoral) will liaise with other Housemasters/mistresses (HoMs), the Deputy Heads (Academic) and Heads as necessary. Other agencies may also be contacted.

The Deputy Head of the Pre-Prep has particular responsibility for children in the Early Years Foundation Stage.

How Allegations of Child on Child Abuse are Recorded, Investigated and Dealt With

It is essential that all concerns/allegations of child on child abuse, including sexual violence or sexual harassment between children, are handled sensitively, appropriately and promptly. If a member of staff thinks, for whatever reason, that a child may be at risk of abuse by their peer(s), they should discuss their concerns with the DSL without delay so that a course of action can be agreed.

The DSL will, where necessary, take immediate steps to ensure the safety of the child/children affected, in line with the advice for practitioners in *Part 5 of Keeping*



Children Safe in Education. The DSL will use their professional judgement to determine whether it is appropriate for the alleged behaviour to be dealt with internally, or whether any external specialist support is required. In borderline cases the DSL may wish to consult with First Response and/or any other external agencies on a no-names basis to determine the most appropriate response.

Where there is an allegation or a concern of child on child abuse, the College will carry out a robust risk and needs assessment in respect of each child affected by the abuse. This may range from an unwritten 'dynamic' assessment to a detailed written assessment depending on the severity of the case. Please see Section 24 and the College's policy on risk assessments for pupil welfare.

In cases where the DSL deems it appropriate to contact First Response, they will discuss the allegations/concerns with them and agree on a course of action, which may include:

- managing the incident internally with help from external specialists where appropriate and possible;
- undertaking/contributing to an inter-agency early help assessment, with targeted early help services provided to address the assessed needs of a child/children and their family;
- referring the child/children to Children's Social Care for assessment; or
- reporting alleged criminal behaviour to the Police.

All concerns/allegations of child on child abuse will be assessed on a case by case basis and taking into consideration DfE guidance on contextualised safeguarding.

Staff involved with cases of child on child abuse should ensure that they keep accurate records of all related conversations, meetings, communications, discussions, decisions and outcomes on CPOMS.

BYSTANDERS

The issue of being a bystander or accessory is addressed with all pupils. Pupils are encouraged to respect one another and to 'call out' or 'call in' inappropriate behaviour; this includes when they are using electronic devices.

FOLLOWING UP INCIDENTS

This is likely to involve communication between staff: the Heads, Deputy Heads, HoMs and other linked staff.

It will often be appropriate to speak to the pupils involved, either individually or in groups and to bring perpetrators and victims together in an atmosphere of trust so that they can discuss their feelings openly.

Normally contact will be made by the respective HoMs with the parents/guardians of both the victim and the perpetrator.



Thereafter vigilance and monitoring will be important to ensure that there is no repetition or unpleasant consequences and that the victims feel safe.

If a pupil is found to have made a malicious allegation against a member of staff then appropriate disciplinary action will be taken in consultation with the Heads, Deputy Heads and HoMs and might involve any of a range of measures that are available.

Support for those Affected by Child on Child Abuse

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Support for those involved in cases of child on child abuse will consider their age, the nature of the allegations and the risk of further abuse. The College must ensure that all those involved are safeguarded, providing pupils with education and support as necessary. The views of the child/children affected should also be taken into account.

Unless it is unsafe to do so (for example where a referral needs to be made immediately), the DSL should discuss proposed action with the child/children involved and their parents, as well as obtaining consent to any referral before it is made. The College should manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so.

If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the College will ensure that, subject to the advice of First Response, the pupil's parents are informed as soon as possible and the pupil is supported during the interview by an appropriate adult. In the case of pupils whose parents are abroad, their guardian will be requested to provide support and to accommodate the pupil should it be necessary during the investigation.

Normally the DSL will try to discuss any concerns about a child's welfare with the family, and where possible seek their agreement to make a referral. However, in accordance with DfE guidance, this will only be done when this will not place the child at increased risk. The child's views will also be taken into account. Where there are doubts or reservations about involving the child's family, the DSL should clarify with First Response or the Police whether, and if so when and by whom, the parents should be told about the referral. This is important in cases where the Police may need to conduct a criminal investigation.

It is important for Clifton College to ensure that any pupils involved with an allegation of child on child abuse remain protected, especially from bullying or harassment. Clifton College will support all pupils involved in accordance with the advice of the relevant agencies.



SAFEGUARDING CHILDREN AND YOUNG PEOPLE

When there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm' a bullying incident should be addressed as a child protection concern under the Children Act 1989. Where this is the case, the school staff should discuss with the school's Designated Safeguarding Lead and report their concerns to First Response and work with them to take appropriate action.

First Response contact number: 0117 903 6444

BULLYING WHICH OCCURS OUTSIDE COLLEGE PREMISES

School staff members have the power to discipline pupils for misbehaving outside the school premises both in term time and in the holidays. Sections 90 and 91 of the Education and Inspections Act 2006 say that a school's disciplinary powers can be used to address pupils' conduct when they are not on school premises and are not under the lawful control or charge of a member of school staff, but only if it would be reasonable for the school to regulate pupils' behaviour in those circumstances. This may include bullying incidents occurring anywhere off the school premises, such as on school or public transport, outside the local shops, or in a town or village centre.

Where bullying outside school is reported to school staff, it should be investigated and acted on. The Head should also consider whether it is appropriate to notify the police or anti-social behaviour coordinator in their local authority of the action taken against a pupil. If the misbehaviour could be criminal or poses a serious threat to a member of the public, the police should always be informed.

While school staff members have the power to discipline pupils for bullying that occurs outside school, they can only impose the disciplinary sanction and implement that sanction on the school premises or when the pupil is under the lawful control of school staff, for instance on a school trip.

FREQUENTLY ASKED QUESTIONS

Q: Should we prioritise tackling some types of bullying over others?

A: Immediate physical safety obviously comes first. All bullying, whatever the motivation or method, is unacceptable and should not be tolerated. Some issues will be more familiar to schools than others and this policy points to guidance documents for further information about how to tackle specific types of bullying.

Q: Should I discipline pupils for bullying outside the school?

A: Yes. If an incident of bullying outside the school premises or online is reported to the school, it is important that it is investigated and appropriate action is taken. This will send a strong signal to pupils that bullying will not be tolerated and perpetrators will be held to account.

Q: How can we involve parents more in our anti-bullying work?

A: Schools should talk to parents about their anti-bullying policy and make it available to them and prospective parents as part of their behaviour policy. Schools should ensure that parents know what measures are being taken to prevent bullying, as well as how incidents are responded to, and may also encourage positive messages about good behaviour and respect for others at home.

Q: Should I record incidents of bullying?

A: Staff should develop a consistent approach to monitoring bullying incidents in their school and evaluating whether their approach is effective. Staff must record all incidents of bullying and perceived bullying on CPOMS.

EQUAL OPPORTUNITIES STATEMENT

Clifton College maintains an equal opportunities policy in all areas of school life. The aim of this policy is to ensure that no pupil receives less favourable treatment than any other on grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation. The College is committed to making this policy fully effective for all who study and work in the institution.