

Educate U

Trauma Informed Anti-Bullying Policy

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Trauma Informed Anti Bullying Policy

Policy Aims:

- The Headteachers, Senior Leadership Team, teaching and non-teaching staff and parents / carers should know what the school policy is on anti-bullying and what they should do if bullying arises.
- To view bullying through a trauma informed lens and use the appropriate language.
- To provide a happy and secure school environment for all students and staff.
- To ensure that pupils learn in a supportive, caring and safe environment without fear of being bullied.
- To promote consistency of approach and create an environment in which all types of bullying are considered unacceptable.
- To react to bullying incidents in a reasonable, proportionate and consistent way.
- To provide support for all involved in the incidents of bullying. Bullying is anti-social behaviour and affects everyone; it is unacceptable and will not be tolerated.

At Educate U we place the safety and wellbeing of all of our pupils at the heart of everything we do. As a trauma and attachment aware school we recognise, value and promote the fact that all children and adults have the right to go about their daily lives without fear of being threatened, assaulted or harassed, to have an education, to be protected from violence, abuse and neglect and not be discriminated against on any grounds.

Compliance with the Independent School Standards (ISS)

This policy forms part of Educate U's arrangements for meeting the Education (Independent School Standards) Regulations 2014. In particular, Part 3, paragraph 10 requires the proprietor to ensure that bullying at the school is prevented, so far as reasonably practicable, through the drawing up and implementation of an effective anti-bullying strategy.

The school also recognises the relationship between anti-bullying practice and its wider responsibilities for safeguarding, behaviour, pupil welfare, equality and the spiritual, moral, social and cultural development of pupils.

Educate U will ensure that this policy is implemented effectively in practice and that pupils are taught, in ways appropriate to their age, development and SEND, how to recognise, report and respond to bullying.

Definition of Bullying

The repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power. Bullying can be physical, verbal or psychological. It can happen face-to-face or online.

<http://www.anti-bullyingalliance.org.uk/about-us.aspx>

How does bullying differ from teasing/falling out between friends or other types of aggressive behaviour?

- There is a deliberate intention to hurt or humiliate.
- There is a power imbalance that makes it hard for the victim to defend themselves.
- It is usually persistent.
- Occasionally an incident may be deemed to be bullying even if the behaviour has not been repeated or persistent – if it fulfils all other descriptions of bullying. This possibility should be considered, particularly in cases of hate crime related bullying and cyberbullying. If the victim might be in danger, then intervention is urgently required.

Single Incidents of Harm

Educate U recognises that some harmful behaviour may not meet the usual definition of bullying because it has occurred only once. A single incident may nevertheless constitute harassment, discriminatory behaviour, sexual harassment, violence, child-on-child abuse or another safeguarding concern and will be responded to accordingly. Staff must consider the nature, context and impact of the behaviour and must not wait for a pattern of behaviour to develop before taking appropriate action.

As a school we do not underestimate the impact that bullying can have on a person's life. It can cause high levels of distress, affecting young people's well-being, academic and social development right through into adulthood. Therefore, we believe pupils and families should have the confidence that they will be listened to and that any bullying that is reported will be dealt with promptly and effectively. We actively encourage our pupils to speak to their teacher, teaching assistant or any other adult in school about any bullying in school or outside of school.

The pupils at Educate U have a wide range of complex special educational needs and many have had Adverse Childhood Experiences (ACEs). As a school community we understand that bullying in this context can have additional subtleties and raise issues that are in themselves complicated to resolve. Not all pupils at Educate U will recognise bullying behaviour if they experience it or may be unable to express their aversion to it, and also to respond appropriately to instances of bullying behaviours. Equally not all students would recognise that certain behaviours directed towards others may be undesirable or that they might be construed as bullying.

Bullying and Trauma

The National Child Traumatic Stress Network (NCTSN), states: Children or teens who have been exposed to trauma and violence may be more likely to:

- Bully others
- Be more distressed by bullying or appear desensitised to bullying
- Be the targets of bullying themselves

Children who have experienced trauma are more likely to be bullied and to engage in bullying behaviour. In some cases, children who experience trauma may develop social or interpersonal difficulties, making them more likely to become targets of bullying. Studies of Adverse Childhood Experiences, or ACEs, have found that children who report more ACEs are also more likely to exhibit bullying behaviour (Sacks, et al., 2014)

Bullying and Labels

As a Trauma Informed School, we recognise that the power of language can have unintended consequences. The National Child Trauma Stress Clinic recommends, instead of referring to “bullies” and “victims,” more appropriate language includes “the child who bullied another pupil” (rather than “the bully”) or “the pupil who was bullied” (rather than “the victim”).

Simply labelling a student as a “bully” or “victim” can perpetuate:

- A lack of hope or belief that there can be a change in behaviour for someone who bullies or a change in the social-emotional impact that results from being bullied.
- Labels that serve to define a young person’s role in the school community and society.
- A focus only on the individual without considering the external context in which the bullying occurred, such as in a school with a negative school climate or a home with domestic violence that can influence, perpetuate, and even shape behaviours between peers, students, and the adults. It is therefore vital that we view all bullying through a trauma informed lens.

Bullying and children with SEND

The Department for Education anti-bullying guidance notes, ‘children with special educational needs and disabilities may not be able to articulate their experiences.’ Therefore, Educate U uses the following strategies to support pupils to understand what is meant by the definitions above and how to resolve any bullying situation. Pupils who are being bullied may show changes in behaviour, such as becoming shy, nervous, feigning sickness, refusing to come to school, clinging to adults, refusing to remain in class. It is important that all school staff are alert to the signs of bullying and act promptly and firmly against any form of bullying in line with the roles and responsibilities listed below. It is also possible that one child may develop an obsession with another child or

display challenging/undesirable behaviours towards others through high anxiety levels. These may manifest in potentially harmful behaviours such as kicking, biting, pinching, hitting or throwing objects. Staff have a duty to be vigilant to these behaviours and the fear/anxiety that the ‘target’ child may have. Incidents of bullying with or without intent are recorded on MyConcern (the school’s safeguarding platform). Any incidents of bullying will be reported immediately via MyConcern to the Designated Safeguarding Lead, Deputy Designated Safeguarding Lead and Deputy Headteachers and Headteacher. It is important that this information must be shared amongst all members of the class team and other members of staff as soon as possible. This should be done through end-of-day debrief.

Educate U recognises that a pupil's SEND, communication profile, developmental level, trauma history or understanding may affect their ability to recognise the impact of their behaviour or communicate what has happened to them. These factors will always be taken into account when assessing incidents and determining an appropriate response. However, SEND or additional needs will not be used to minimise the impact of harmful behaviour on another pupil. The school will consider the needs, vulnerabilities and safety of all pupils involved and will put appropriate support and protective measures in place where required.

Safeguarding and Bullying

Bullying may constitute a form of child-on-child abuse. In accordance with *Keeping Children Safe in Education 2026*, staff must recognise that child-on-child abuse can include bullying, including cyberbullying, prejudice-based and discriminatory bullying.

Where behaviour may constitute abuse rather than, or in addition to, bullying, it will be managed under the school's Safeguarding and Child Protection Policy and child-on-child abuse procedures. Staff must not dismiss abusive behaviour as “banter”, “having a laugh”, “part of growing up” or simply an expression of a pupil's SEND or additional needs.

The school recognises that children can abuse other children both inside and outside school and online, and that pupils may experience abuse from individuals or groups.

Bullying is recognised as a safeguarding concern and will be treated with the utmost seriousness. All incidents of bullying will be reported promptly to the Designated Safeguarding Lead (DSL) or Deputy DSL (DDSL). Where bullying incidents indicate potential risk or harm to a pupil’s welfare, safeguarding procedures will be activated in line with the Safeguarding Policy.

All bullying incidents will be recorded on MyConcern to ensure effective oversight and follow-up by safeguarding staff.

What does bullying look like?

Bullying behaviour can be physical, verbal or emotional and includes:

- Physical assault
- Taking or damaging belongings
- Name calling
- Taunting
- Mocking
- Making offensive comments
- Cyber bullying - inappropriate text messaging or e-mailing; sending offensive or degrading images, impersonating, and hacking into accounts online using internet enabled devices, being unkind online and sending offensive messages.
- Producing offensive graffiti
- Gossiping and spreading hurtful and untruthful rumours
- In-direct bullying, including excluding people from groups.
- Sexual and sexist bullying, sexual harassment and harmful sexual behaviour

Although bullying can occur between individuals it can often take place in the presence (virtually or physically) of others who become the 'bystanders'.

Specific types of bullying include:

- Prejudice Related Bullying
- Under the Equality Act 2010 it is against the law to discriminate against anyone because of:
 - age
 - being or becoming a transsexual person
 - being married or in a civil partnership
 - being pregnant or having a child
 - Disability
 - race including colour, nationality, ethnic or national origin including Gypsy Roma, Travellers
 - religion, belief or lack of religion/belief
 - sex / gender
 - sexual orientation

As part of the requirement on schools to promote fundamental British Values, we will proactively challenge derogatory and discriminatory language and behaviour including that which is racist, homophobic, biphobic, transphobic and disablist in nature. We will record these types of bullying, even that which represents a one-off incident, and report them to the local authority for monitoring purposes.

Educate U will challenge and respond to bullying, harassment, victimisation and discriminatory or prejudiced behaviour connected with a protected characteristic under the Equality Act 2010. The protected characteristics are:

age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

In a school context, not every protected characteristic applies to pupils in exactly the same way under every provision of the Equality Act. Nevertheless, Educate U promotes respect for all protected characteristics and will challenge prejudiced, discriminatory or derogatory behaviour or language relating to any of them.

Other vulnerable groups include:

- bullying related to appearance or health
- bullying of young carers or looked after children or otherwise related to home circumstances.

Although the above do not currently receive protection under the Equality Act 2010, bullying for these reasons is just as serious. There is no hierarchy of bullying – all forms are taken equally seriously and dealt with appropriately.

Prejudice Related Language

Racist, sexist, homophobic, biphobic, transphobic, ableist/disablist and other prejudiced or discriminatory language will be challenged consistently. This includes language directed towards a person because of an actual or perceived protected characteristic, or because of the characteristics of a family member or someone with whom they are associated. Such language is generally used to refer to something or someone as inferior. This may also be used to taunt young people who are different in some way or their friends, family members or their parents/carers.

In the case of homophobic, biphobia and transphobic language particularly, dismissing it as banter is not helpful as even if these terms are not referring to a person's sexual orientation or gender identity, they are using the terms to mean inferior, bad, broken or wrong. We will challenge the use of prejudice related language in our school even if it appears to be being used without any intent. Persistent use of prejudice related language and/or bullying will be dealt with as with any other form of bullying.

Sexual and sexist bullying, sexual harassment and harmful sexual behaviour

Bullying or child-on-child abuse may involve sexist or sexualised behaviour. This may include sexual comments, remarks or jokes; sexualised name-calling; unwanted sexual attention; sexual harassment; spreading sexual rumours; making comments about another person's body; unwanted touching; sexualised online behaviour; or sharing or threatening to share sexual images or content.

Sexual harassment may occur on its own or as part of a wider pattern of abuse. Online sexual harassment will be treated as seriously as behaviour occurring face-to-face.

Sexual violence, sexual harassment and other harmful sexual behaviour are safeguarding matters. Where these behaviours are reported or suspected, staff will

follow the school's Safeguarding and Child Protection Policy and the procedures set out in *Keeping Children Safe in Education 2026*. They will not be treated solely as behaviour or bullying incidents.

Where does bullying take place?

Bullying is not confined to the school premises. It also persists outside school, on the journey to and from school and in the local community and may continue into Further Education.

Educate U recognises its responsibility for pupils' welfare during all school-related activities, including trips, work placements, transport, and remote learning. Bullying that occurs in these contexts is subject to school policies and procedures, and incidents will be addressed promptly.

The school maintains clear guidance and support for pupils on safe behaviour online and in virtual spaces.

Cyber bullying

The increasing use of digital technology, apps and the internet has also provided new and particularly intrusive ways for child-on-child abuse including Cyber bullying. At Educate U Pupils are not permitted to have their mobile phones, tablet computers or any other internet-enabled devices in school and they are expected to hand these in for safe keeping until they go home.

Most incidents of Cyber bullying occur outside school, we will offer support and guidance to parents/carers and their children who experience Cyber bullying and will treat Cyber bullying with the same level of importance as any other forms of bullying.

Cyber bullying Includes:

- hacking into someone's accounts/sites.
- Posting prejudice / hate messages
- Posting unkind media
- Impersonating someone online
- Public posting of images
- Exclusion
- Threats and manipulation
- Stalking

We will ensure that our children are taught safe ways to use the Internet we talk with our children and advise on safe ways of using the internet on a daily basis. We work closely with our families to support them and young people

- young people and staff
- between staff

- individuals or groups

How can we prevent bullying?

As stated in the DfE guidance Tackling and Preventing Bullying, 'a school's response to bullying should not start at the point at which a child has been bullied.' At Educate U we put the following things in place to ensure that we are preventing and tackling bullying.

- Ensure all staff are trained to identify the signs of bullying through CPD and ensure this is included in staff induction.
- Ensure all staff have a knowledge of the child's background and how this may impact upon their behaviours.
- Actively promote systematic opportunities to develop pupils' social and emotional skills, including their emotional resilience through the school's PSHE system, Therapies, ELSA (Emotional Literacy Support Assistant) interventions and Motion activities.
- Celebrate differences through the PSHE and the school curriculum.
- Ensure staff are role models for the children. The behaviour of adults towards each other and towards the children is a potentially highly effective tool for preventing and for decreasing bullying behaviours.
- Ensure that pupils know where, who and how to report bullying concerns, with child friendly resources and social stories where appropriate.
- Publicise the details of helplines and websites
- Offer support to pupils who have been bullied.
- Support families at home with Online Safety to prevent and help to filter and monitor online use where a child has been, is being or is at risk of bullying,
- Work with pupils that have been bullying in order to address issues they may have.
- Ensure that pupils who have bullied another pupil(s) are aware of the range of effects of their actions.
- All staff share responsibility for acting immediately if they suspect bullying or are approached by a pupil with a bullying concern.
- The DSL and DDSL will ensure that all records are held securely on MyConcern and kept up to date including any liaison necessary with outside agencies e.g. the police if necessary.

Implementing the Anti-Bullying Policy

The following steps will be taken when dealing with incidents:

- If bullying is observed, suspected or reported, the incident will be followed up immediately by the member of staff who has been made aware.

- A clear account of the incident will be recorded on My Concern and reported to the appropriate member of staff (SEN Tutor, Class Teacher, Parent / Carer connection, SLT and Headteacher).
- Where possible, the member of staff dealing with the incident will speak to all parties involved and seek an accurate account of what has happened. This will be typed up directly to MyConcern.
- The class teacher will make initial contact home for both / either the pupil who has been bullied and the pupil who has bullied another pupil.
- All relevant staff will be kept informed and if the bullying persists and all staff (including transport where relevant) will be advised using appropriate communication channels e.g. email, telephone and daily briefing.
- Parents/carers will be kept informed throughout.
- Actions will be put in place as appropriate and in consultation with all parties concerned.

Pupils who have been bullied will be supported by:

- Offering an immediate opportunity to discuss the experience with a teacher, a member of SLT or a member of the therapeutic team.
- Being reassured that the incident is being investigated and taken seriously.
- Having self-esteem and confidence restored.
- Parent/carers contacted and updated on the incident that has occurred and the action the school has taken with the pupil who has been bullied and the pupil who has bullied.
- If appropriate, restorative justice facilitated by staff. Restorative approaches form the cornerstone of conflict resolution at Educate U. This involves:
 - Facilitated meetings where those involved in bullying discuss impact and agree ways to repair harm and restore relationships.
 - Support for both the child who has bullied to understand the effects of bullying and to develop empathy and social skills and the child who has been bullied so that they can see action and resolution and experience a repair to the rupture.
 - The effectiveness of restorative work is carefully managed and reviewed regularly by a pastoral staff member to ensure sustained positive outcomes.
 - Restorative approaches will only be used where they are considered safe, appropriate and in the best interests of the pupil who has experienced harm. No pupil will be required to participate in restorative work. Restorative approaches will not replace safeguarding action, disciplinary action, risk management or referral to external agencies where these are required.

Pupils who have bullied will be helped by:

- Discussing what happened.
- Having their parents or carers informed to help change the attitude and behaviour of the pupil who bullied. This may involve the parents and carers being invited into school with the child so there is a close knit home-school team around the pupil who has bullied.
- Use of PACE language by staff to explore the feelings that may have led to the bullying behaviour in the first place.
- Planned ongoing support arising from these conversations.
- Enabling the pupil who has bullied to understand and empathise with the feelings of the pupil who was bullied.
- If appropriate, restorative justice facilitated by staff. Restorative approaches form the cornerstone of conflict resolution at Educate U. This involves:
 - Facilitated meetings where those involved in bullying discuss impact and agree ways to repair harm and restore relationships.
 - Support for both the child who has bullied to understand the effects of bullying and to develop empathy and social skills and the child who has been bullied so that they can see action and resolution and experience a repair to the rupture.
 - The effectiveness of restorative work is carefully managed and reviewed regularly by a pastoral staff member to ensure sustained positive outcomes.
 - Any restorative work will be undertaken in accordance with the safeguards set out above and will only take place where it is safe and appropriate for all pupils concerned.
- Updating the pupil's Positive Behaviour Support Plan and Risk Assessment to include specific strategies for staff.

Working with Families

Close work with our pupils' families is an essential part of our approach at Educate U. Bullying is one of the most potentially sensitive areas of home/school life, so every effort will be made to conduct conversations sympathetically, calmly and tactfully, bringing family members into school where necessary. The school will work collaboratively with families in order to support a consistent approach between home and school, to address, challenge and change bullying behaviours. In some instances this may trigger traumatic memories for parents/carers. Staff will endeavour to signpost appropriate sources of support for them.

Bullying of Adults

As a school we have a zero tolerance policy towards any type of bullying. This encompasses between bullying of staff members, or from a member of staff towards a

parent or carer, or from a parent or carer towards a member of staff. If this happens the Headteacher will investigate and discuss with relevant named parties

Staff Training and Continuing Professional Development (CPD)

Educate U provides regular CPD on anti-bullying, trauma-informed practice, SEND awareness, and online safety for all staff. Training is delivered at least annually and includes:

- Recognising signs of bullying, including subtle or non-verbal indicators, especially in pupils with communication difficulties.
- Understanding the impact of trauma and SEND on pupils' behaviour and vulnerability to bullying.
- Strategies to prevent, identify, and respond effectively to bullying incidents.

Staff are encouraged to refresh their knowledge through additional training as required.

Pupil Voice and Involvement

Pupil participation is central to our anti-bullying approach. Pupils are actively engaged through:

- Peer mentoring and buddy schemes to support vulnerable pupils.
- Student councils that provide feedback on school culture and bullying concerns.
- Inclusion in the regular review and update of the anti-bullying policy and related procedures.

Empowering pupils helps build a culture of respect, kindness, and mutual support.

Monitoring, Evaluation, and Reporting

The school will monitor and analyse bullying and related safeguarding incidents regularly in order to identify patterns, emerging concerns and areas requiring further action. Monitoring will include, where relevant, the type and nature of the behaviour, pupils involved, location, time and context of incidents, repeat incidents or patterns involving particular pupils or groups, and whether incidents relate to SEND, protected characteristics, prejudice or discrimination, online behaviour, child-on-child abuse, sexual harassment or harmful sexual behaviour.

Records will be maintained on MyConcern and reviewed by safeguarding and senior leaders to ensure that appropriate action, support and risk management are in place. Information and trends will be reported termly to the Directors to support strategic oversight and improvements in practice.

Feedback is also gathered from pupils and families through surveys and informal discussions to assess the effectiveness of anti-bullying interventions. Educate U will use this information to evaluate the effectiveness of preventative education, staff training,

supervision arrangements and individual interventions, and will amend practice where patterns or concerns are identified.

Roles and Responsibilities

Directors

- To approve the policy before publication

Headteacher

- The Headteacher will undertake a formal annual review of this policy for the purpose of monitoring and of the efficiency with which the related duties have been discharged, by no later than one year from the date shown below, or earlier if significant changes to the systems and arrangements take place, or if legislation, regulatory requirements or best practice guidelines so require.
- To oversee whole school promotion of equality and inclusion.
- To ensure staff have up to date CPD on bullying.
- To monitor, refine and audit the policy.
- To schedule whole school Anti-Bullying events annually, For example, to promote anti-bullying week and anti-bullying work in general.
- To ensure PSHE coverage of anti-bullying.
- To investigate any bullying of adults if these arise (staff and parents and carers).

Deputy Headteachers

- To ensure that the whole school is promoting equality and inclusion.
- To support anti-bullying strategies.
- To oversee the implementation of the Anti –Bullying policy.
- To plan provision for whole school Anti-Bullying events annually.
- To ensure that any instances of bullying are recorded and monitored through MyConcern.
- Work with families so that they are aware of the school's policy/practice and specific circumstances if they arise.
- Alongside the DDSL, to act as a port of call to advise staff on any bullying related matter.

All Staff

- Ensure that all incidents of bullying are reported onto MyConcern.
- To be vigilant and constantly monitor the pupils for bullying related behaviour and follow the procedure when evidence points towards bullying taking place.
- To model high standards of behaviour and have high expectations from all the students.
- To maintain a positive attitude towards all pupils.

Parents / Carers

If a parent/carer is concerned about their child/young person being bullied they should:

- Contact the school immediately and ask to speak to the Class Teacher. If you would like to come into school to discuss please contact the Parent Connection lead, Mark Brown (DDSL). If class teachers and DDSL are unavailable they should ask to speak to a member of the Senior Leadership Team.
- Work with the school to resolve any issues arising from an incident that the child/young person is anxious about.
- Contact the school if the bullying is taking place on Home to School Transport.
- Parents/carers should not make any contact with the child who has bullied their child/young person, or the family of the child who has bullied their child/young person.

Policy Review Process

This policy is reviewed annually by the Headteacher. Feedback is regularly sought from all stakeholders is valued to ensure the policy remains effective and relevant.

Contact Information and External Support

Key Contacts:

- Designated Safeguarding Lead (DSL): Emma Jenkinson, 01903 297906, emma@educateu.co.uk
- Deputy DSL: Mark Brown, 01903 297906, mark@educateu.co.uk

External Support Organisations:

- Childline: 0800 1111, www.childline.org.uk
- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
- NSPCC: 0808 800 5000, www.nspcc.org.uk

Pupils and families are encouraged to seek support from these services in addition to school staff.

Confidentiality and Data Protection

All information related to bullying incidents is handled with strict confidentiality in line with data protection legislation (UK GDPR). Records are stored securely and shared only with staff on a need-to-know basis to protect pupil welfare and privacy.

Appendix 1: Linked Standards and Frameworks

This policy aligns with and supports compliance with the following statutory standards, guidance, and frameworks:

1. Independent School Standards (ISS) – Department for Education

2. Keeping Children Safe in Education (KCSIE) 2026 – DfE Statutory Guidance
 - Safeguarding and child protection procedures including bullying
3. Working Together to Safeguard Children – HM Government
 - Multi-agency safeguarding and child protection framework
4. Equality Act 2010
 - Protection from discrimination, harassment, and victimisation
5. Education and Inspections Act 2006
 - Headteacher duties on behaviour and anti-bullying
6. Children and Families Act 2014
 - Education Health and Care Plans (EHCPs) and SEND support
7. Special Educational Needs and Disability (SEND) Code of Practice (2015)
 - Meeting social, emotional, and mental health needs of pupils
8. Human Rights Act 1998
 - Right to dignity, privacy, and safety
9. Prevent Duty (Counter-Terrorism and Security Act 2015)
 - Safeguarding pupils from extremist bullying and radicalisation
10. Online Safety Standards
 - UK Council for Internet Safety (UKCIS) frameworks and DfE guidance on online safety and cyberbullying
11. Public Sector Equality Duty (PSED)
 - Duty to promote equality and prevent prejudice-based bullying
12. Local Safeguarding Children Partnership (LSCP) Procedures
 - Protocols for responding to bullying-related safeguarding concerns
13. Preventing and Tackling Bullying – DfE advice
14. Behaviour in Schools – DfE guidance