ST SWITHUN'S SCHOOL

PREVENTION OF BULLYING POLICY

SENIOR SCHOOL

Policy History	
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Reviewed by:

Deputy head pastoral	**Head of Boarding**	**Education Committee**
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Policy Aims

St Swithun's School aims to create a positive and supportive atmosphere, characterised by mutual respect, kindness, tolerance and understanding of the needs of others. In doing so it enables each student to thrive, whatever their circumstances.

The aims of this policy are to:

- Actively promote and safeguard the welfare of all students
- Create and maintain a positive and supportive culture throughout the school
- Prevent bullying, detect it when it occurs and respond to it appropriately
- Ensure that students know how to recognise different forms of bullying and where to get help if they feel they are, or another student is, at risk of bullying
- Ensure that students are aware of school procedures and have confidence to use them

In order to fulfil these aims, the school will:

- Ensure that the whole community of parents, students and staff understand what bullying is, recognise the signs and contexts and are aware of the procedures to follow if they have concerns
- Equip students with strategies which enable them to respond quickly to actual or perceived bullying behaviour towards themselves or others
- Reinforce the anti-bullying message with students across the school and in the curriculum
- Reinforce the anti-bullying message with parents through communications
- Reinforce the anti-bullying message with the whole staff community through general and specific INSET, staff meetings and individual communications between staff members
- Provide pastoral support to those who experience bullying behaviour and those who are perpetrating bullying behaviours

Scope and Application

This policy applies to the whole Senior school at all times when a student is:

- In or at school (to include any period of remote provision)
- Representing the school
- Travelling to or from school
- On school-organised trips
- In their boarding house during evenings and weekends
- Not at school, but the school becomes aware of an incident of bullying

This policy shall also apply to students at all times and places in circumstances where, failing to apply this policy may:

- affect the health, safety or well-being of a member of the school community or a member of the public
- have repercussions for the orderly running of the school; or
- bring the school into disrepute

Staff must always be vigilant, with tutors and house staff in particular paying close attention to the group dynamics in their forms and houses.

Regulatory Framework

This policy has regard to the following regulatory requirements, guidance and advice:

- Equality Act (2010)
- National Minimum Standards for Boarding Schools (DfE, 2022)
- Keeping Children Safe in Education (September 2026)
- Working Together to Safeguard Children (HM Government 2025)
- Preventing and Tackling Bullying: Advice for School Leaders, Staff and Governing Bodies (DfE, July 2017)
- SEND Code of Practice (April 2020): 0-25 years
- Equality Act 2010: advice for schools (DfE, May 2014)
- Behaviour in schools (DfE September 2022)
- Behaviour in Schools: advice for headteachers and school staff (DfE, February 2024)
- Cyberbullying: advice for headteachers and school staff (DfE, November 2014)
- Searching, Screening and confiscation: advice for schools (DfE, 2023)

The following school policies, procedures and resources are relevant to this policy:

- Behaviour, Rewards and Discipline policy
- Child Protection & Safeguarding policy (including child on child abuse policy)
- Supervision of Students policy
- Missing student policy
- Online safety policy
- Thrive (PSHE) schemes of work (which include curriculum relating to anti-bullying, harassment and discrimination)
- ICT Acceptable Use Policy
- Concerns, problems and complaints: guidance for students (see Appendix 2)

Definition of bullying

We take our definition of bullying from the DfE which defines it as, 'behaviour by an individual or group, that is repeated over time, that intentionally hurts another individual or group either physically or emotionally' (DfE, July 2017).

That said, a single act may be considered bullying if it involves:

- Abuse or misuse of power that undermines, humiliates, denigrates, or causes physical or emotional harm to the recipient
- An act of an extreme nature, such as a physical assault or a very serious verbal attack

Rather than use the labels, 'bully' and 'victim' which can be very emotive we will use the terms 'child who is bullying' and 'child experiencing bullying', as they imply that it is the behaviour, not the child, that is the issue and that, with help, the behaviour can change.

Bullying can take many forms and is often motivated by prejudice against particular groups. It might be motivated by actual differences between children, or perceived differences. Bullying may be:

- **Physical**: hitting, kicking, pushing people around, spitting, shaking, biting, hair pulling or taking, damaging or hiding possessions
- **Verbal**: name-calling, gossiping, taunting, teasing, insulting, threatening or undermining, humiliating or demanding (such as demanding money)
- **Non-verbal abuse**: hand signs or text messages (see also cyberbullying below)
- **Emotional abuse**: controlling or manipulating someone, making silent, hoax or abusive calls
- **Exclusionary behaviour**: intimidating, isolating or excluding a person from a group
- **General unkindness**: constant criticism, spreading rumours or writing unkind notes, mobile phone texts or emails, social media posts
- **Initiation / hazing type behaviour**: rituals which may include but is not limited to activities involving harassment, abuse or humiliation used as a way of initiating a person into a group
- **Low level disruptive behaviour**: "banter" or "horseplay" over a prolonged period, including misogyny
- **Cyberbullying**: bullying that takes place using technology. This may include bullying through the use of mobile electronic devices, social media or gaming sites. See Appendix 3 for guidance for students about cyberbullying. The School's ICT Acceptable Use Policy for students sets out the school rules about the use of technology including mobile electronic devices
- **Harmful sexual behaviours**: includes sexual harassment and sexual violence (*NB incidents of this nature may be dealt with under the Safeguarding & Child protection policy as child-on-child abuse*):
    - **sexual harassment**: unwanted conduct of a sexual nature that can occur online and offline. It can include but is not limited to:
        - sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
        - Misogynistic comments and harmful gender-based behaviour
        - sexual jokes or taunting
        - physical behaviour such as deliberately brushing against someone, interfering with their clothes, displaying pictures, photos or drawings of a sexual nature
        - online sexual harassment which may include: non-consensual sharing of sexual images and videos (sharing of nudes or semi-nude images or videos); inappropriate sexual comments on social media; exploitation; coercion and threats; upskirting. Incidences of sexual harassment will be investigated to ensure they are not part of a wider pattern of sexual harassment and / or sexual violence
    - **sexual violence**: 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
- **AI generated abuse** including manipulated, altered or deepfake content
- **Discrimination-based bullying:** This is when someone is treated unfairly because of any of the protected characteristics. So, bullying may also be:
    - sexist: related to a person's sex or gender reassignment
    - racist, or regarding someone's religion, belief or culture

- Related to a person's faith
- related to a person's sexual orientation (homophobic bullying)
- related to pregnancy and maternity
- related to a person's home circumstances
- related to a person's disability, special educational needs, learning difficulty, health or appearance
- related to a person's age; or
- LGBT-based bullying: Children who are lesbian, gay, bisexual, or transgender (LGBT) can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or are not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff to help counter homophobic, biphobic and transphobic bullying and abuse
- related to other perceived differences, such as being adopted or having caring responsibilities

Image based abuse

The School considers image-based abuse to be a serious form of bullying and potential safeguarding concern.

Examples include:

- sharing photographs without consent;
- creating or distributing manipulated images;
- use of "nudification" applications;
- sharing intimate images;
- threats to share images;
- use of deepfake technologies to humiliate, intimidate or exploit others.

Such behaviour may constitute child-on-child abuse and will be addressed in accordance with safeguarding procedures.

Vulnerable Students

Some students are more likely to be the target of bullying because of the attitudes and behaviours some young people have towards those who are different from themselves. These include those with special educational needs or disabilities, those who are adopted, those who are suffering from a health problem or those with caring responsibilities may be more likely to experience bullying because of difference. Looked After Children are frequently on the move and may also be vulnerable because they are always the newcomer.

These young people are often the same young people who might need greater support to deal with the impact of bullying, for example those who are going through a personal or family crisis. In addition, children with special educational needs or disabilities can sometimes lack the social or

communication skills to report such incidents, so it is important that staff are alert to the potential bullying this group faces and that their mechanisms for reporting are accessible to all.

There will also be a range of other local or individual factors that result in some children being more vulnerable to bullying and its impact than others. Being aware of this will help schools to develop strategies to prevent bullying from happening. It will also help schools be alert to those children who may be severely affected when it does occur.

The impact of bullying can be severe because of the nature and extent of the bullying or because it is combined with other factors such as those mentioned above that also affect the social, mental and emotional health of the student.

Boarders
We should be mindful that boarders may have added vulnerabilities. As stated in the National Minimum Standards for boarding (16.3) boarders who are being bullied (offline) cannot escape the child who is bullying them for long periods of time as they are not going home as often. Children who bully are also more likely to strike when their behaviour is hidden. This includes areas like common rooms, bedrooms or changing areas when their target may be alone.

Signs of bullying:

All members of the school community must be alert to the possible signs of bullying. These may include:

- Unwillingness to attend school, or avoids attending lessons or going into specific areas of the 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 health centre with symptoms such as stomach pains, headaches
- Frequently waiting to speak to the teacher at the end of lessons
- 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
- Excessive use of phone/mobile device
- Reluctant to discuss reasons for any of the above

It is acknowledged that this list is not exhaustive and that these behaviours may have a different underlying cause. However, accounts of any of these behaviours, or a combination of them, should be reported as soon as possible, either via CPOMS or by emailing the appropriate Head of Year.

Safeguarding and child-on-child abuse

Bullying can sometimes amount to child-on-child abuse, which can occur both inside and outside of school and/or online. Further information about child-on-child abuse, including the school's policy and procedures can be found in the school's Safeguarding & Child Protection Policy.

Preventative Measures

St. Swithun's response to bullying does not start at the point at which a student has been bullied. We take a range of preventative measures in order to create an environment that prevents bullying from becoming a problem in the first place. These include:

Students

- St. Swithun's promotes an ethos of good behaviour where students always treat each other with respect.
  Through our pastoral care systems students are taught that bullying will not be tolerated in school. Measures are taken to educate students about bullying behaviour. These include:
    - The PSHE and RSE programme (Thrive), which is structured to give students an awareness of their social and moral responsibilities. It enforces the message about the importance of taking care of each other; developing positive relationships is a core theme throughout the programme
    - Form programmes address matters of diversity, equality and inclusivity
    - The concepts of kindness and positive relationships are key themes within our Positive Education programme
    - Other lessons, particularly RS, English and drama highlight the issue of bullying and reinforce the message that bullying is unacceptable
    - 'Need Someone to Talk to' posters (Appendix 1 and 2) are displayed in every form room and boarding/day house in the school and are discussed with the students during form time and house meetings
    - Assemblies, including external speakers, explain the school policy on bullying, and encourage reflection

- All students have access to telephone helplines, including an Independent Listener, enabling calls for support; they also have access to the school email of any member of staff to whom they may wish to communicate discreetly
- The school recognises that children with special educational needs and disabilities and certain medical or physical health conditions can face additional safeguarding challenges, including the potential to be disproportionately impacted by behaviours such as peer group isolation bullying, without outwardly showing any signs. The school will consider extra pastoral support for students with special educational needs and disabilities, as required.
- Diversity, Equality and Inclusion (DEI) questions and answer forum

Staff

- Upon induction all new members of staff are given training and guidance on the school's prevention of bullying policy
- The school recognises that certain children may be more at risk of bullying than others and may require additional support when dealing with incidents of bullying. The school will

ensure that staff receive appropriate support to be able to understand the needs of our students and to provide an inclusive environment for all

- Staff are on duty at lunch times and after school when students are not in class and are alert to areas where bullying might occur. Inappropriate language or behaviour is always challenged
- All staff are trained to be alert to possible signs of bullying, harassment and discrimination
- The school chaplain will give support to any member of the community. The chaplain actively encourages the development of tolerance, understanding and respect for others in a multi-faith community
- We have a strong and experienced pastoral team of tutors, heads of year, house staff and welfare team who support the Head of Boarding and Deputy Head pastoral and who are trained in handling any incidents as a priority, and who are alert to possible signs of bullying:
- In boarding houses, evening tutors support the house staff who act *in loco parentis.* The informal house environment is important in reinforcing a student's standards and values, providing the opportunity for friendly, informal discussion of matters of concern to the individual student outside the formal classroom. A member of boarding house staff is always on duty to supervise the students. The school will comply with its obligations as set out in the DfE National Minimum Standards. Close contact between the house staff and parents/guardians is maintained, especially if there are worries about a student's well-being
- All reported incidents are recorded on CPOMS and investigated as soon as possible. Incidents are monitored and a log of incidents is kept by the Deputy Head pastoral in order that patterns of behaviour can be identified and monitored
- Staff are informed about protected characteristics
- The school has the right, and duty, to investigate incidents of bullying involving our students which take place outside school hours, online, on school visits and trips and that occur in the vicinity of the school
- Staff will always consider the motive behind bullying behaviour and whether it raises any concerns for the welfare of the perpetrator.

Partnership with Parents

Working with parents / guardians is essential to establishing the school's anti-bullying ethos and resolving any issues that arise. This policy is readily available on the school's website so that parents are clear on the school's approach to bullying and what to do if their child experiences bullying.
If parents know or suspect that their child, or another student, is being bullied, they should contact the school without delay. All concerns will be taken seriously.
We welcome feedback from parents and guardians on the effectiveness of our preventative measures and all other aspects and implementation of this anti-bullying policy.

Reporting Concerns

Students

Pupils should report bullying concerns whenever they occur, whether they take place:

- in school;
- during educational visits;

- online;
- outside school hours;
- through social media;
- through gaming platforms;
- through AI-generated content.

A student who is being bullied, or who is worried about another student being bullied, should tell someone without delay and can do so in several ways. They can:

- tell their parents, form tutor, head of year, House staff, chaplain, counsellor, head of boarding, deputy head pastoral or any member of staff or volunteer at the school
- contact the NSPCC Helpline (0808 800 5000) or Childline (0800 1111) or the Children's Commissioner (0800 528 0731).
- Contact the Independent Listener: Gill Longman – 07711 269020

In every form room and every boarding house there is a poster identifying all those who are ready to listen (although this could be any member of staff). It also contains names of outside agencies that students can contact if they prefer. See Appendix 1 for an example.

There is more information for students in the 'Prevention of bullying: Guidance for students' booklet.

Parents

We actively encourage parents and guardians to support us in preventing bullying within the school. Parents, along with peers, will probably be the first to hear of an alleged bullying incident or notice a change in a student's behaviours or moods.

Parents who are concerned that their child is being bullied should inform their child's form tutor, or Head of Year without delay. If the issue is predominantly a boarding one, the student's housemistress /master can be contacted in the first instance. It is important to try and reserve judgment at this stage and allow the school to complete an investigation into the allegation.

The following checklist may be helpful for parents to consider to ensure that correct and appropriate information is passed on, but this should only be elicited from their daughter in a way that supports her wellbeing and does not cause further distress and absence of any of this information should not delay informing the school.

- What happened?
- Who was involved?
- Who saw it?
- Where did it take place?
- How often has it happened?
- Why did it take place?
- What form did the bullying take?

Whenever a case of bullying is established the parents or guardian of both the child who is experiencing bullying and child who is bullying will be informed by the school.

Staff

If a member of staff or volunteer learns of alleged bullying behaviour they should:

- Respond quickly and sensitively by offering advice, support and reassurance to the child who is experiencing bullying
- Listen carefully and keep an open mind
- Avoid asking leading questions
- Reassure the child without promising confidentiality and
- Report the allegation by either recording on CPOMS under 'bullying allegation' or contacting the student's Head of Year and/or boarding housemistress/master as soon as possible

Some incidents initially reported as bullying may constitute child-on-child abuse and require safeguarding intervention.

The School will consider whether bullying behaviour indicates:

- sexual harassment;
- sexual violence;
- coercive or controlling behaviour;
- exploitation;
- hate incidents;
- radicalisation;
- abuse facilitated by technology.

Where safeguarding concerns are identified, these will be referred to the Designated Safeguarding Lead and managed in accordance with safeguarding procedures.

Why incidents might not be reported

There are many reasons why a student who has experienced bullying may be reluctant to report it. They may become demoralised and may think, for example:

- It is seen as 'telling tales'
- 'They (the school) won't believe me because the person I am complaining about is popular and I am not, and I will become even more unpopular'
- The things they are saying and doing are too embarrassing to discuss with an adult
- 'It is all my fault anyway for being overweight / too studious' etc
- There are too many of them; there is nothing the staff can do
- It will get back to my parents and they will think less of me
- I will just try and toughen up and grow a thicker skin
- I will lie low and not draw attention to myself
- This is a normal part of growing up and going to school

There are also reasons why a student who has witnessed or learned of bullying behaviour may not want to make a report. They may think:

- It is 'grassing' and I will become unpopular or even a target myself'
- It is not my concern anyway

- I don't like the child who has been experiencing bullying, and I would find it embarrassing to be associated with them

Any of these responses would be contrary to our culture. When we implement this policy we encourage every student (and their parents) to understand that:

- Every complaint of bullying (or unkind behaviour) will be taken seriously
- Members of staff and volunteers will deal with a complaint correctly and effectively in accordance with the training they have received
- There is a solution to nearly every problem of bullying
- A student who complains will receive support and advice
- The primary aim will be for the bullying to cease, not the punishment of the child who is bullying, unless this is necessary
- We may also need to support the child who is bullying, so that we can address the causes of bullying behaviour

Assessment of Concerns

The student's Head of Year or Housemistress / master (or a member of SLT for more serious concerns) will normally see the child who is experiencing bullying and any witnesses to form an initial view of the allegation. They will get written statements from each of these individuals. The assessment will consider:

- The nature of the incident(s): physical; sexual; verbal; exclusionary etc
- The impact of the incident on the victim – how are they presenting? What do they feel about what has happened to them?
- Whether it is a 'one-off' incident involving an individual or a group
- Whether it is part of a pattern of behaviour by an individual or a group
- Whether the alleged child who is bullying should be questioned without disclosing the child experiencing bullying's identity
- Who should be informed
- What the likely outcome might be if the allegation proves to be correct

At this stage, the possible outcomes for an incident which is not too serious include:

- There has been a misunderstanding which can be explained sympathetically to the alleged child who is bullying with advice to them; or
- The complaint is justified in whole or in part, and further action will be needed.

Parents will be informed as deemed appropriate.

Not all behaviours that may be classed as bullying are deliberate. Some individuals may see their hurtful conduct as "teasing", "banter", "a game" or "for the good of" the other person. These behaviours are equally unacceptable but may not be malicious and can be corrected quickly with advice and without disciplinary sanctions. If left unchallenged or dismissed, they can have a wearing, and significant impact on targeted individuals exposed to such behaviour and may lead to a culture of failing to report. This is not a culture the school adopts. Early intervention can help to set clear expectations of the behaviour that is and isn't acceptable and help stop negative behaviours escalating.

If at any stage the alleged bullying behaviour raises a safeguarding concern, the school's Child Protection and Safeguarding Policy and procedures should be followed before further investigation is carried out. This will always be the case where consensual or non-consensual sharing nude or semi-nude images or videos / sexting or other harmful sexual behaviours are involved. Where bullying allegedly involves youth produced sexual imagery, staff will not view, or forward sexual imagery reported to them and will follow the school's procedure on sharing consensual or non-consensual nude and semi-nude images as set out in the school's Safeguarding and Child Protection Policy.

Otherwise, in cases where the student's Head of Year/ Housemistress / master believes that more serious bullying behaviour has occurred involving a student or has recurred after warnings have been given to the child who is bullying, they will refer the matter to the Deputy Head Pastoral.

The Deputy Head pastoral will:

- Interview the alleged child who is experiencing bullying, the child who is bullying and any witnesses separately, in order to establish the facts of the case. They may each be asked to write their account of events. It may be decided to ask another member of staff to be present and/or it may be that an advocate is present for support if the student wishes
- Discuss their findings with the Head and other relevant staff
- Further interviews may be necessary at a later stage
- Together with the Head, the Deputy Head Pastoral will decide on the action to be taken in accordance with this policy (and the Behaviour, Rewards and Sanctions Policy, where appropriate)
- The Deputy Head or Head will notify the parents of the child who is experiencing bullying and child who is bullying giving them details of the case and the action being taken. Such action may include further investigation and/or action in accordance with the school's behaviour and discipline policy.

Response to Concerns

When an allegation of bullying behaviour is upheld, the response is likely to include one or more of the following:

- Consideration as to whether the bullying incident should be addressed as a safeguarding concern and if so, the school's Child Protection and Safeguarding Policy will be followed
- Advice and support for the child who is experiencing bullying and, where appropriate, establishing a course of action to help them, including support from external services where appropriate
- Advice and support to the child who is bullying in trying to change their behaviour. This may include clear instructions and a warning or final warning
- Consideration of the motivation behind the bullying behaviour and whether external services should be used to tackle any underlying issues of the bully which contributed to the bullying behaviour.
- A supervised meeting between the child who is experiencing bullying and child who is bullying to discuss a strategy which enables all concerned to close the episode and avoid future conflict (only with the child who is experiencing bullying 's express agreement)
- A disciplinary sanction against the child who is bullying, in accordance with the school's Behaviour, Rewards and Sanctions Policy. Any disciplinary action will be applied fairly,

consistently and reasonably, taking into account any special educational needs or disabilities and the needs of vulnerable students

- Confiscation of mobile electronic devices, increased monitoring procedures or limiting access to the school's internet and email facilities if cyberbullying – see Appendix 3 (see also the school's ICT acceptable use policy for students)
- Moving either the child who is experiencing bullying or the child who is bullying to another House or form group after consultation with the student who is experiencing the bullying, their parents and the relevant staff
- Involving children's social care or the police
- Notifying the parents of one or both students about the case and the action which has been taken
- Any other action as the Head may deem appropriate

The situation should be monitored for as long as necessary thereafter. Action may include:

- Sharing information with some or all colleagues and with students in the Form / Year / House so that they may be alert to the need to monitor certain students closely
- Ongoing counselling and support
- Vigilance by staff
- Reviewing vulnerable individuals and areas of the school

Record Keeping

All records created in accordance with this policy are managed in accordance with the school's policies that apply to the retention and destruction of records. School staff maintain records of the welfare and development of individual students. Every complaint or report of bullying is recorded centrally and monitored to enable patterns to be identified, both in relation to individual students and across the school as a whole and to evaluate the effectiveness of the school's approach. The deputy head pastoral will maintain a centralised record of all allegations or reports of bullying, including details of those involved and the action taken.

Complaints procedure

Parents and students are encouraged to use our Complaints Procedure (which is published on our website) if they feel that any concerns about bullying (or anything else) are not being addressed properly. Staff can also use the whistleblowing procedure.

Monitoring and Review

The deputy head pastoral will maintain and monitor the centralised record of bullying incidents on a regular basis to identify patterns in behaviour and the effectiveness of the school's anti-bullying procedures.

The Bullying log is reviewed by the Headmistress and Senior Management Team at least termly. This policy is reviewed and updated at least annually, by the Senior Management Team and is also reviewed by the Education Committee at least annually.

APPENDIX 1: Example of notice displayed in houses and form rooms



Appendix 2: Concerns, Problems and Complaints (displayed in houses and form rooms)

We all have problems and difficulties from time to time and it is important that we learn to address them and find means of solving them. You should always try to talk to someone about any problem which is making you unhappy.

The difficulties can range from concerns about minor matters to serious problems about work or relationships with staff or fellow students. A situation may arise when there is cause for serious complaint about unfair treatment, infringement of the rights of the individual or even abuse.

Informal procedure

Minor concerns should normally be talked through with your form tutor, housemistress or housemaster, or another relevant member of staff. If you feel that it is a general issue, not merely a personal one, it can be discussed in the school forum.

Your friends or an older student may be able to help, but sometimes you will need the help of an adult. In school, your housemistress/housemaster, their deputy, your form tutor, the headmistress, deputy head or any member of staff to whom you feel you can talk comfortably will always listen to you. Concerns or problems revealed in this way will **not** be openly discussed in the staff room.

Equally, you may find it more appropriate to talk to your parents, staff in the Health Centre, the school counsellor or the chaplain.

If you wish to talk to someone independent of school, you could contact any of the people or organisations listed below. Gill Longman is an independent listener who lives locally, but has no formal connection with the school:

Gill Longman (independent listener):	**07711 269020**
Childline:	**0800 1111**
NSPCC Helpline:	**0808 800 5000**
Independent Schools Inspectorate:	**020 7600 0100**
Office of the Children's Commissioner:	**0800 528 0731**

Formal complaints procedure

If something is causing you such serious worry that you wish to make a formal complaint, you should set out in writing the grounds for your complaint, sign it and give it to the headmistress, deputy head or head of boarding.

If you have a more formal complaint or concern, you can email the

headmistress:	**gandeej@stswithuns.com**
deputy head:	**yatesg@stswithuns.com**
head of boarding:	**ludlowa@tswithuns.com**

Once the complaint has been formally made, the member of staff with whom it has been lodged will:

a) investigate fully the factual basis of the complaint;
b) interview other individuals involved to get an overall view of the perceptions and points of view which may be influencing the matter;
c) have a second meeting with the complainant to discuss the results of a) and b).

This meeting will be as soon as is reasonably possible and a record of the discussion will be agreed by both parties. You may bring a friend or other independent person with you to either or both of the meetings. If the complaint is of a serious nature, it may be necessary to ask an independent person to investigate it. This may be done at the request of the complainant or senior staff member.

Appendix 3 Cyberbullying and AI

The School recognises that online technologies continue to evolve rapidly and may be used to facilitate bullying and abuse.

The Department for Education's guidance Preventing and tackling bullying (DfE, July 2017) states that "The rapid development of, and widespread access to, technology has provided a new medium for "virtual" bullying, which can occur in or outside school. Cyberbullying is a different form of bullying and can happen at all time of the day, with a potentially bigger audience, and more accessories as people forward on content at a click".

It is an aggressive, intentional act often carried out repeatedly over time, and often against an individual who cannot easily defend himself/ herself. The school acknowledges that cyber-bullying may take place inside school, outside of school and at any time of the day.

Cyber-bullying is bullying that takes place using technology. It can take the form of many behaviours including:

- harmful messages (text, instant, multimedia, email)
- impersonating another person online
- sharing private messages
- uploading photographs or videos of another person that leads to shame and embarrassment
- creating hate websites / social media pages
- excluding people from online groups
- dissemination of rumours or false information
- harassment through gaming platforms

The School also recognises the safeguarding risks presented by artificial intelligence technologies.

These risks may include:

- AI-generated abuse;
- deepfake images and videos;
- manipulated audio recordings;
- AI-generated sexualised imagery;
- impersonation of pupils or staff;
- dissemination of false or misleading content.

Incidents involving AI-generated content will be assessed through both the Anti-Bullying Policy and Child Protection and Safeguarding Policy where appropriate.

For the prevention of cyber-bullying, in addition to the measures described above, St. Swithun's:

- Expects all students to adhere to its Online Safety Policy. Certain sites are blocked by our filtering system and our IT Department monitors students' use
- May impose disciplinary sanctions for the misuse, or attempted misuse, of the internet in accordance with the Online Safety Policy
- Issues all students with their own personal school email address. With restricted access to social media sites during the school day

- Offers guidance on the safe use of social networking sites and cyber-bullying in IT and PSHE lessons, which covers online risks and harms
- Ensures its students are aware of the various forms in which cyber-bullying can take place, that it can have severe and distressing consequences, and that participation in cyber-bullying will not be tolerated
- Offers guidance on keeping names, addresses, passwords, mobile phone numbers and other personal details private and secure
- Does not allow the use of mobile phones in school for L4 – U5 students between 08.15 and 16.20

Procedures for dealing with cyber-bullying

The school will follow the procedures set out in this policy and the Safeguarding and Child Protection Policy where relevant for incidents of cyber-bullying, taking such disciplinary action that is considered reasonable in the circumstances, with a view to regulating student conduct and protecting the reputation of the school, and the welfare of its students. Although cyber-bullying is not a specific criminal offence, there are criminal laws that may apply to communications of a harassing or threatening manner or the unauthorised publication of private images, upskirting, sharing nudes/semi-nudes and sexting. Where the school considers that a reported incident of cyber-bullying may amount to a criminal offence, it will inform the Police.

Electronic devices

In response to an allegation of cyber-bullying, certain staff are permitted to conduct a search for electronic devices, such as a student's mobile phone, with the authority of the Head. Staff do not require the consent of the student, or their parents to undertake a search, provided they have reasonable grounds for suspecting that the student is in possession of a prohibited item, and provided they have the Head's prior consent to undertake a search.

The search will be conducted in accordance with the procedure set out in the Search and Confiscation policy. Where a search finds an electronic device that is prohibited by the school rules, or where the member of staff undertaking the search reasonably suspects that the electronic device has been, or is likely to be, used to commit an offence or cause personal injury or damage to property, the school may examine any data or files on the device, where there is good reason to do so, for example, where there has been an allegation of cyber-bullying. Parental consent to search through electronic devices is not required. However, this should be viewed as a last resort and where possible, external advice should be sought first.

The school may also erase any data or files from the device if the school considers there to be good reason to do so, unless there are reasonable grounds to suspect that the device may contain evidence in relation to a criminal offence, where the files should not be deleted and the device must be given to the Police without delay.

If, following a search, the member of staff determines that the device does not contain any evidence in relation to an offence, or are advised by the Police following a report to them that they will not take any further action to investigate an alleged offence, the School can decide whether it is appropriate to delete any files or data from the device, and may retain the device as evidence of a breach of the Student Behaviour, Rewards and Sanctions Policy. The school may then take steps to sanction the student in accordance with the Student Behaviour, Rewards and Sanctions Policy, where appropriate. In the event that the search highlights a safeguarding concern in respect of any

student, the school will follow the procedures set out in the School's Safeguarding and Child Protection Policy. The school will keep a record of all searches carried out, including the results of any search, and the actions taken following that search.