



Anti-bullying Policy

Reviewer: James Hayden/Michelle Lucas-Halliwell

Approver: Anna Cutts

Reviewed: April 2025

Next Review: April 2026

Last approved by Council: June 2025

1. Introduction

1.1 This policy applies to all pupils at Cheltenham College irrespective of their age and whether or not a pupil is in the care of the College when or if bullying behaviour occurs. This policy provides guidance for all pupils, staff and parents about recognising bullying and what to do if a bullying incident occurs.

1.2 This policy has been drawn up with assistance from the guidance issued by the DfE Preventing and Tackling Bullying (July 2017) as well as the NSPCC guidance and will be reviewed against subsequent government guidance issued from time to time.

1.3 A copy of this policy is available on the College website and upon request from the Bursar's PA and should be read in conjunction with the College's:

- ☐ Child Protection and Safeguarding Policy;
- ☐ Child on Child Abuse Policy.
- ☐ E-Safety and Acceptable Use of ICT Policy;
- ☐ Behaviour Policy
- ☐ Rewards and Sanctions Policy;
- ☐ Keeping Children Safe in Education 2023
- ☐ A pupil's Guide to Dealing with Bullying & Cyber-bullying

1.4 Pupils, staff and parents should also see the supplementary advice documents and other helpful resources listed throughout this policy.

1.5 The 'Pupil Guidance' in this policy was discussed and agreed by the College Student Council in October 2024

2. Aim

2.1 The ultimate aim of the College Anti-Bullying policy is to create a culture in College that ensures that everyone can operate in a supportive, caring and safe environment without the fear of being bullied. All members of the community, including Council, teaching and non-teaching staff, pupils and parents should have an understanding of what bullying is and be familiar with the College policy on bullying. Bullying is an anti-social behaviour, which affects

everyone; it is unacceptable and it will not be tolerated.

2.2 Everyone in the community has a responsibility to report any incident of bullying that comes to their attention and these reports will always be taken seriously. Reporting bullying so it can be addressed is especially important within boarding schools like College; boarders who are being bullied (off line) cannot escape their bullies during term time in the same way that pupils in a day school are able to. Only when all issues of bullying are addressed will our pupils be able to fully benefit from the opportunities available at College. College operates a "Say you're in, Call it out Campaign" and all pupils are made aware of our Cheltonian Charter through 'Values Assemblies'. The latter document is written by College Prefects. The aim of both is to encourage a culture of kindness and tolerance, focusing on an individual's responsibility to regulate their own behaviours and those of their peer group.

3. Definition

3.1 Bullying may be defined as any behaviour by an individual or a group that is deliberately hurtful either physically or emotionally, usually (but not exclusively) repeated over a period of time, where it is difficult for those being bullied to defend themselves. It is often motivated by prejudice against particular groups, for example, on grounds of race, religion, culture, sex, gender, homophobia, special educational needs and disability, or because a child is adopted or is a carer – it may occur directly or through cyber-technology (social websites, mobile phones, text messages, photographs and email).

Often the bully or bullies hold more power than those being bullied. This may be down to differences in age, or other factors that cause a power imbalance. This imbalance of power can manifest itself in several ways, physical, psychological (knowing what upsets someone), derive from an intellectual imbalance, or by having access to the support of a group, or the capacity to socially isolate. It can result in the intimidation of a person or persons through the threat of violence or by isolating them either physically or online. All staff should be aware that children can abuse other children (child on child abuse) and bullying, specifically when it involves hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm should be treated as a safeguarding issue.

Examples of unacceptable behaviour include:

- a) Physical (including sexual) behaviour. For example, hitting, kicking, pushing, spitting, removing belongings, damaging property, touching someone in an inappropriate or sexually inappropriate way.
- b) Verbal abuse, by name calling, taunting, mocking, teasing, insulting (including sexually inappropriate comments), writing notes, making offensive remarks or spreading malicious gossip.
- c) Attacking property, by stealing or hiding or vandalising someone's possessions.
- d) Cyber-bullying, which is defined as the use of technology by an individual or group to support deliberate, repeated and hostile behaviour intended to harm others. A single event may be considered cyber-bullying depending on the circumstances and impact on the victim. Examples include: inappropriate text messaging or emailing, sending offensive or inappropriate images by text, social media or email, and the use of 'Deep Fake' AI generated imagery to humiliate or malign.
- e) indirect emotional tormenting by excluding from social groups, gossiping or spreading hurtful or untrue rumours, initiation (hazing) ceremonies intended or likely to cause pain,

anxiety or humiliation.

f) persistent or unwelcome contact, whether physical, verbal, or online.

g) bullying related to coercive, controlling behaviour within a relationship.

h) bullying in intimate relationships leading to sexual harassment, sharing of consensual and non-consensual sharing of nudes and semi-nude images, as well as sexual activity such as upskirting, down-blousing or cyber flashing.

3.2 Protected Characteristics:

Bullying may involve complicity that falls short of direct participation by, for instance, manipulating a third party to tease or torment someone. It may be overt and intimidatory but is often hidden and subtle. It includes actions or comments that fall under the protected characteristics (although bullying is not limited to these), pertaining to a pupil's:

- ☐ sex
- ☐ race
- ☐ disability
- ☐ religion or belief
- ☐ sexual orientation
- ☐ gender reassignment
- ☐ pregnancy and maternity

3.3 Prejudice based bullying:

Prejudice based bullying is repeated hurtful behaviour that exploits or abuses someone based on their actual or supposed membership of a vulnerable group or their support for such a group. The protected characteristics identified in the Equality Act 2010 (as set out above) are particularly relevant in this context

Staff should be particularly vigilant around bullying that could be:

- ☐ Bullying related to race, religion, belief or culture; (see Prevent Policy)
- ☐ Bullying related to special educational needs (SEND), learning difficulties or disabilities or health conditions;
- ☐ Bullying related to personal appearance or body shape;
- ☐ Bullying related to sexual orientation;
- ☐ Bullying related to pregnancy and maternity;
- ☐ Bullying of young carers or looked after children or adopted children or otherwise related to home circumstances;
- ☐ Bullying related to a person's gender or gender reassignment.
- ☐ Bullying in the form of unwanted sexual behaviour.

3.4 The seriousness of bullying cannot be over-emphasised. Bullying is a form of emotional abuse, especially if it causes them to feel frightened or in danger.

Bullying is among the top concerns that parents have about their children's safety and well-being at, and on the way to and from, school. Bullying is also a top concern of children and young people themselves. Bullying makes the lives of its victims a misery: it undermines their confidence and self-esteem and destroys their sense of security. Bullying impacts on its victims' attendance and attainment at school; marginalises those individuals or groups who

may be particular targets for bullies and can have a life-long negative impact on some young people's lives. At worst, bullying can be a factor in pupil suicide. Children with specific vulnerabilities such as special educational needs and disabilities are more likely to be a victim of bullying. All staff should take this into consideration when dealing with incidents of bullying.

Pupils of Concern List is circulated to staff on a regular basis. This list highlights pupils who may be vulnerable because of specific individual circumstances.

3.5 It is acknowledged that bullies may have complex reasons for their behaviour and may well also need help. It should also be recognised that the consequences of being allowed to 'get away with it' can be detrimental to them as well as to their victim. All pupils deserve the opportunity to be helped to understand what acceptable behaviour is. There are criminal laws that apply to harassment, assault, distribution of inappropriate images and threatening behaviour.

3.6 Bullying becomes a child protection matter when it causes or poses a risk of significant harm to a child, particularly when it involves physical violence, coercion, emotional abuse, or persistent, targeted behaviours that impact a child's wellbeing or development. Under the Children Act 1989, local authorities have a duty to safeguard and promote the welfare of children, and the Education Act 2002 places a statutory responsibility on schools to do the same. When bullying meets the threshold for abuse, it is addressed in line with our Child-on-Child Abuse Policy, which recognises that harmful behaviour between children can constitute abuse and must be responded to accordingly. The school will assess the situation, and if necessary, take advice from the Community Social Work. If the threshold is reached a referral will be made to Gloucestershire's Multi-Agency Safeguarding Hub (MASH). Support for the child will also be structured using the Gloucestershire Graduated Pathway, including tools such as My Plan or My Plan+, to ensure a coordinated, multi-agency approach tailored to the child's individual needs.

4. What to look for

4.1 Pupils who are being bullied may show changes in behaviour, such as becoming shy and nervous, feigning illness, taking unusual absences or clinging to adults. There may be evidence of changes in work patterns, lacking concentration or truanting from school.

All members of the community must be alert to the signs of bullying and act promptly and firmly against it, in accordance with College policy. Surveys have shown that in the vast majority of bullying incidents, MOST people knew that what was going on was wrong. Sometimes people, either through lethargy, peer group pressure, or tacit support for what is going on, fail to take action.

5. What to do

The way to combat bullying is for people to be aware of the issues involved, and to be clear in their own minds what action to take should concerns arise:

5.1 If you are the victim:

5.1.1 If you feel able to, confront the bully by verbally making him/her aware that you think that what he/she is doing is wrong. Do not respond physically. Bullies want to upset you; if you

respond calmly and even with humour, they will see little point in trying again.

5.1.2 Share your feelings with someone else. Ideally, talk to any member of staff such as your Tutor or Housemaster/Housemistress. You can also talk to the Director of Pupil Welfare or with our Student Support Services by emailing sss@cheltenhamcollege.org. If you would rather not go straight to a member of staff, talk to your friends; talk to a senior pupil, a Peer Mentor or one of the Prefects. They may well be able to advise on an appropriate course of action or will be able to involve other people who can. Make use of the option to be able to tell your HsM discreetly by using the "I think you should know" box in your House. Tell your parents or another family member. Do remember to say something. If you really feel unable to speak to anybody in College then you can use the anonymous reporting tool "Whisper" by clicking on the following link <https://swgfl.org.uk/whisper/chc1/>

5.1.3 There are also people outside the College who would be willing to help. Details of organisations who may be able to help include:

- ☐ Childline: 0800 1111 or www.childline.org.uk
- ☐ Kidscape: www.kidscape.org.uk;
- ☐ NSPCC: www.nspcc.org.uk;
- ☐ Anti-bullying Alliance: www.anti-bullyingalliance.org.uk
- ☐ Young Minds: www.youngminds.org.uk
- ☐ Family Lives: www.familylives.org.uk
- ☐ Samaritans: www.samaritans.org

5.2 If you are a pupil and you witness bullying behaviour:

5.2.1 Do not, do nothing. Support the victim by offering your friendship and make it clear that in your opinion what is happening to them is wrong. Encourage them to speak out on their own behalf by confronting the bully, or with their permission, confront the bully yourself.

5.2.2 Take the victim to a trusted adult as described above and reassure them that doing something will make a positive difference, or suggest that you see someone on their behalf.

5.2.3 All pupils in College are encouraged to read the "A Pupil's Guide to Dealing with Bullying & Cyberbullying" notice in Houses and the "Worried about things" notice which are displayed in houses.

5.3 If you are a member of Staff and you witness an incident of bullying or it is reported to you:

5.3.1 Reassure and support the pupils involved. Advise them that you are required to pass details on to the relevant member of the pastoral team: Housemaster/Housemistress (HsM), Assistant Head Pastoral (AHP), The DSL and the Senior HsM. Staff should refer using CPOMS by ticking the bullying category. This should be done as soon as possible.

5.3.2 This person will record all incidents of reported bullying. At College the Incident Report must be completed on CPOMS. These reports are reviewed regularly by the AHP, DSL and SDH. A central log of all complaints or incidences of bullying will be recorded on CPOMS and a list headed by AHP/SDH. Follow up dates will be recorded on the incident record as an action. The initial follow up must occur within 2 weeks of the incident, or sooner if necessary.

5.3.4 Where 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. Staff should immediately discuss the issue with the DSL or deputy DSLs in this situation. If there is immediate concern for the safety of a child, staff can make appropriate physical contact to control or restrain a pupil.

5.3.5 College reserves the right to contact the police if an offence may have been committed under the Malicious Communications Act 1988.

5.3.6 Low level disruption should be challenged. Early intervention can help to set clear expectations of the behaviour that is and isn't acceptable and help stop negative behaviour escalating. This may be recorded as a level 0.

5.4 Bullying Levels and what will happen:

The levels below are guidance to assess the school's response to incidents of peer on peer harmful behaviour. Contextual factors will always be taken into account.

Level 0 (Stage 0)	Thoughtlessness: Whether on-line or in person, if a pupil has made comments that are unkind and hurtful, but are considered to be clearly thoughtless the HsM may have a conversation with the pupil about the impact of their behaviour. They may be asked to complete a 'Think about it' memo and could be placed in detention to write reflective essays. This conversation would be recorded by the HsM. The Senior Hsm should be consulted to ensure consistency of Level 0 across Houses. It is likely parents would be contacted by their Hsm.
Level 1 (Stage 1)	Whether on-line or in person, where there is a degree of repetition, or where thoughtless behaviour involves physicality, or if there is an imbalance of power such as where the victim is a vulnerable pupil, or where the bullying is across different year groups. At Level 1 it is likely to involve a Senior Hsm Gating and parents will be informed in writing by the Senior Hsm or Hsm depending upon circumstances. This stage may be by-passed and sanctions imposed immediately if bullying is found to be more serious. Should a pupil accumulate several L1 sanctions that are related to different pupils a more significant sanction is likely to be issued.
Level 2 (Stage 2)	Warning as to future conduct: If, after the above discussion, the bullying continues, it will be assumed it is deliberate, and a more severe approach will need to be taken. If an individual incident of bullying is deemed serious enough, this may also warrant a 'Level 2 intervention.' Sanctions will depend on the severity of the bullying. Following HsMs discussion with Senior HsM and Assistant Head Pastoral a formal letter will be sent to parents. A meeting with parents and AHP may be necessary.
Level 3 (Stage 3)	If after these two stages the bullying continues, or in very serious individual cases where significant physical or emotional harm has been caused, it will be assumed that the pupil has no respect for other Cheltonians and this will not be tolerated within the school community. In this situation a meeting between parents and the Head to discuss a pupil's position in the College community will be arranged. In very serious cases it may be necessary to make a report to the Police or Social Services. College reserves the right to act to address a pupil's conduct when s/he is not on school premises or under control of a College member of staff. This may include contacting outside agencies.

The above levels are equally applicable for breaches of acceptable behaviour on-line

Reparation: Where appropriate, reparation may be used in conjunction with any Level of Bullying. It offers a 'no-blame' approach to both parties. The victim(s) and their bully(ies) may have a discussion with a teacher who would normally be the HsM. This discussion allows both parties to give their opinions and to try to work out a solution which is mutually agreeable. The aim is to allow the bullies to realise that they are causing unhappiness and that their behaviour will not be tolerated. Everything in this discussion will be recorded in writing and filed. Following this, communication will be made with parents / guardians to let them know about the situation and what has been done. This will be confidential, although tutors should be made aware and an Incident should be uploaded to CPOMS. The HsM may want to inform House Prefects so that they can be vigilant.

In all cases it is important that the “voice of the child” is heard and that their views are sought and recorded. A pupil may choose not to partake in the reparation process, for example.

5.5 Prevention:

5.5.1 The College will raise the awareness of all the staff through education and staff briefings which will ensure that staff responsibilities and the principles underpinning this policy are understood. This is done through staff Inset looking at issues such as child-on-child abuse, looking at issues surrounding pupils with SEND and issues surrounding LGBT+.

5.5.2 To raise greater awareness among the pupils, the key points from this policy will be prominently displayed on College notice boards and will be discussed with pupils during Tutor led Floreat sessions. It will also be revisited as necessary during Floreat sessions to all years and reinforced in other areas of the curriculum and co-curriculum, as the opportunities present themselves. Differences between people are also referred to in Floreat, TPE and other subjects and both staff and pupils will be made aware of the inappropriateness of any type of discrimination.

We encourage pupils to read and be familiar with 'A pupil's Guide to Dealing with Bullying & Cyber-bullying'. Anti-bullying will feature as a regular discussion point for Pupil Voice.

House staff are encouraged to keep a special eye out for more vulnerable pupils who may be the victim of bullying and are likely to suffer more from any bullying.

5.5. Pupil surveys are used in order to facilitate an understanding of the level and type of bullying that pupils might have experienced. College also operates a Peer Mentors scheme whereby older pupils are encouraged to offer advice and support to younger pupils. Leadership training is provided to College and House Prefects, which specifically covers the importance of offering support and assistance to younger and vulnerable pupils.

5.5.4 The record of bullying offences is reviewed regularly by the respective AHP and DHP in order to identify trends and patterns and check that the policy is effective and introduce additional initiatives when necessary. Anti-Bullying is also a standing item on the whole school Pastoral Management Team (PMT) agenda. The PMT generally meets four times a term.

5.5.5 One of the most effective ways to prevent bullying is to celebrate difference and the

successes of individuals in a variety of fields.

5.5.6 To encourage greater use of **Whisper** in order to report incidents of bullying, for example through assemblies and Floreat, as well as talking to parents about it at the start of term new parent information day.

5.6 Support and follow up

A pupil who has been bullied will need support and the HsM will lead this support. This may involve more formal welfare plans or may just involve a HsM / tutor keeping an eye on the pupil. It may be appropriate for some victims, and in some cases perpetrators, to be placed on the WMT list and to receive support from SSS.

Following a bullying incident at level 2, and where deemed appropriate at level 1, a follow up meeting will be arranged with the victim to ensure that they feel satisfied with how the incident was handled, that their voice was heard and that there were no further repercussions. The outcome of this meeting should be recorded on House Bullying records and on CPOMS.

6. Information for Parents

The following information may be helpful to parents and guardians in playing their part in the prevention of bullying:

- Look for unusual behaviour in your child. For example, s/he may suddenly not want to attend school, feel ill regularly, or not complete work to their usual standard.
- Ask how your child's day has gone, who they have spent time with, what they did at lunchtime etc.
- If you feel your child is being bullied, encourage your son or daughter to inform their Housemaster or Housemistress immediately. If they will not do so, then please do so yourself. Your concern will be taken seriously and appropriate action in accordance with this policy will follow.
- It is important that you tell your child not to fight back. It can make matters worse! Where possible encourage your child to take ownership of the issue themselves, and tell staff themselves.
- Tell your child that there is nothing wrong with him or her. It is not his/her fault that they are being bullied.
- Make sure your child is fully aware of this Anti-Bullying Policy, and that s/he should not be afraid to ask for help.
- The DfE has published the following guidance document for parents: [Advice for parents and carers on cyberbullying. It can be downloaded from \[www.gov.uk\]\(https://www.gov.uk\).](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/616282/Advice_for_parents_and_carers_on_cyberbullying.pdf)

7. Prevention of Cyber-bullying

The issue of Cyberbullying is one that the College takes seriously. In addition to the preventative measures described above, the College:

- ☐ Expects all pupils to adhere to its ICT Acceptable Use Policy which they agree to on joining the College. Certain sites are blocked by our filtering system and the ICT Department monitors pupils' use

- ☐ May impose sanctions for the misuse or attempted misuse of the internet or e mail
- ☐ Has a dedicated senior member of staff responsible for e-safety
- ☐ Digital-safety talks are delivered on a regular basis on a rolling programme, offering guidance on the safe use of social networking sites, including keeping personal details safe
- ☐ Cyber-bullying is covered in the 3rd Form Induction programme and in the Autumn term all 3rd Form Pupils sign up to a mutually agreed House charter.
- ☐ Cyber-bullying is covered in Floreat sessions
- ☐ Mobile phones are not permitted in classrooms or in the public areas of the College unless with the express permission of a teacher.
- ☐ Lower College Pupils are not allowed mobile phones in College.
- ☐ The use of cameras (including those on mobile phones) is not allowed in communal washing/ changing areas.

In line with College's 'Search Policy', a HsM may, with permission from and in conjunction with the SDH, confiscate and examine data or files on a pupil's electronic device if there are reasonable grounds to suspect a pupil has acted in a manner which may contravene this policy. The HsM may delete these files if there is good reason to do so. If there is evidence that an offence has been committed that image or file should not be deleted prior to the device being handed to the relevant authorities.

If you are a victim of cyberbullying or if you come across harmful content about you online, there are different ways you can report a problem:

- ☐ A national reporting centre (run by the UK Safer Internet Centre) designed to assist everyone in reporting harmful content online - <https://reportharmfulcontent.com/>
- ☐ Install button onto website for report harmful content site - [https://reportharmfulcontent.com/advice/other/further-advice/downloads/ and Internet](https://reportharmfulcontent.com/advice/other/further-advice/downloads/andInternet)
- ☐ Report Remove Tool - <https://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobilesafety/remove-nude-image-shared-online/>

References:

Prevention and tackling of Bullying – DfE 2017
 Education (Independent School Standards) Regulations 2014
 National Minimum Standards for Boarding Schools 2022
www.cyberbullying.org
 Getting started: A toolkit for preventing and tackling homophobic, biphobic and transphobic bullying in secondary schools – Stonewall
 Equality Act 2010