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**ANTI-BULLYING POLICY 2024/25**

Ratified By Governors: Review Date:

Introduction

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**1.POLICY AIMS**

1.1 At Carhill Integrated Primary School, we believe all forms of bullying behaviour are unacceptable. We believe that all pupils have the right to learn in a safe and supported environment.

1.2 The aim of this policy is to ensure that everyone in the school (this includes

pupils and staff) have the opportunity to work and learn in a supportive, caring and safe environment without fear of being bullied.

1.3 Bullying is a highly distressing and damaging form of abuse which we do not tolerate. It is made clear to everyone that this is a form of antisocial behaviour, contrary to our core value of: ‘Learning Together, Growing Together’.

1.4 We believe that every member of the school community has the right to:

**• feel safe and secure;**

**• be treated with respect and courtesy;**

**• have equal opportunities,**

**• be able to learn; and**

**• be valued as a member of the school community.**

1.5 Bullying behaviours of any kind are unacceptable within our school. If bullying does occur, everyone (especially pupils) should be able to report incidents and feel confident that they will be dealt with promptly and effectively.

**2.THE LEGISLATIVE CONTEXT**

There is a broad range of legislation relating to preventing bullying taking place in schools. Schools must therefore, be aware of the relevant legislation and guidance material available when creating its ‘Anti-Bullying’ Policy and the following policies have referred to in the creation of this document.

• The Addressing Bullying in Schools Act (Northern Ireland) 2016;

• The Education and Libraries Order (Northern Ireland) 2003;

The Education and Libraries Order (Northern Ireland) requires the Board of Governors to Safeguard and promote the welfare of registered pupils’,

• The Education (School Development Plans) Regulations (Northern Ireland 2010;

• The Children (Northern Ireland) Order 1995;

• The Human Rights Act 1998;

• The Health and Safety at Work Order (Northern Ireland) 1978.

**2.1 Policy & Guidance Context**

• The Addressing Bullying in Schools Act (Northern Ireland) 2016;

• Statutory Guidance for Schools and Boards of Governors (DE, 2019);

• Pastoral Care in School: Promoting Positive Behaviour (DE, 2001);

• Safeguarding and Child Protection in Schools: A Guide for Schools (DE, 2017);

• Co-operating to Safeguard Children and Young People in Northern

Ireland (Dept. of Health, Social Services and Public Health Safety, 2016);

• Safeguarding Board for Northern Ireland Policies and Procedures (SBNI, 2017).

**2.2 The International Context**

• United Nations Convention on the Rights of the Child (UNCRC).

(UNCRC) sets out every child’s right to:

* Be protected from all forms of physical or mental violence,

injury or abuse, maltreatment or exploitation.

* Be protected from discrimination.
* Express their views, in a supported and accessible way, on

issues that affect them, and to have their opinions taken seriously.

- Education.

**2.3 The Addressing Bullying in Schools Act (Northern Ireland) 2016:**

The key points of the ‘Act’ are that it:

* provides a legal definition of bullying;
* places a duty on the Board of Governors to put in place measures to prevent bullying behaviour, in consultation with pupils and parents/carers;
* requires schools to record all incidents of bullying behaviour and alleged bullying incidents;
* sets out under which circumstances this policy should be applied, namely:
* in school, during the school day;
* while travelling to and from school;
* when under control of school staff, but away from school (Eg. School trip, residential trip, swimming etc).
* When receiving education organised by school but happening elsewhere (eg. In another school);
* Requires this policy is updated at least **every four years.** However, we at Carhill will seek to review Bi-annually and/or in the instance of when change is needed\*

**What does the ‘Act’ mean for schools?**

The ‘Act’ requires schools to record all incidents of bullying and alleged bullying behaviour that is reported. The record must detail:

a. The motivation behind the behaviour;

b. The method of bullying (eg. Verbal, physical, etc);

c. How the situation was addressed.

d. Any scheduled follow-up conversations/meetings.

**3.0 ETHOS & PRINCIPLES**

The following principles underpin the ethos and values of our school community:

• We are committed to a society where children and young people can live free and safe from bullying;

• We believe in a society where bullying is unacceptable and where every child and young person is safe and feels safe from bullying;

• We believe that every child and young person should be celebrated in their diversity;

• We are committed to a preventative, responsive and restorative anti-bullying ethos across the whole school.

• We value the views and contributions of children and young people, we will actively seek these views and we will respect and take them into account;

• We understand that everyone in our school community has a role to play in taking a stand against bullying and creating a safe and welcoming environment for all.

**4.0 CONSULTATION AND PARTICIPATION**

Our policy will continue to be developed in consultation with our pupils, staff, parents/carers

and governors in compliance with the Addressing Bullying in Schools Act (NI) 2016.

**Child-centred consultation will involve:**

▪ workshops with pupil representatives – lead by our Designated Teacher for Child Protection/Anti-bullying ambassador Mr C McGilligan

▪ pupil questionnaires; (Spring 2025 – Appendix 1)

▪ class-based activities, lessons, and discussions.

**Consultation with parents/carers through:**

▪ information shared digitally via Class Dojo

▪ online questionnaires distributed to all parents/carers (Next Scheduled – Summer Term 2025).

**Consultation with other stakeholders through:**

▪ staff meetings and staff surveys (teaching and support staff);

▪ Board of Governors’ meetings discussing the creation and implementation of our anti-bullying policy and comparing our policy to that of other schools throughout Northern Ireland.

**5.0 WHAT IS BULLYING?**

(1) Subsection 1 of the ‘Addressing Bullying in Schools Act (Northern Ireland) 2016 defines ‘Bullying’. It states, “bullying” includes (but is not limited to) the repeated use of:

(a) any verbal, written or electronic communication,

(b) any other act (***including the ‘act’ of omission***), or

(c) any combination of those, by a pupil or a group of pupils against another pupil or group of pupils, with the intention of causing physical or emotional harm to that pupil or group of pupils.

**The above definition includes three elements:**

- Non-limitation to repeated behaviours;

- Method of bullying;

- Intention to cause harm

For the purposes of clarity, the Education Authority encourages school to make it clear that:

Bullying is behaviour that is usually repeated, which is carried out intentionally to cause hurt, harm or to adversely affect the rights and needs of another or others.

While bullying is usually repeated behaviour, there are instances of one-off incidents that schools may consider as bullying. When assessing a one-off incident, to decide on whether to classify it as bullying, the school shall consider the following criteria:

**▪ severity and significance of the incident;**

**▪ evidence of pre-meditation impact of the incident on individuals**

**(physical/emotional);**

**▪ impact of the incidents on the wider school community;**

**▪ previous relationships between those involved;**

**▪ any previous incidents involving the individuals.**

Any incidents which are not considered bullying behaviour will be addressed under the Positive Behaviour Policy.

Bullying behaviours involving or concerning a member or members of staff are covered within the Staff Code of Conduct.

**5.1 Types of Behaviour**

The following unacceptable behaviours, when repeated, targeted and intentionally hurtful, may be considered a bullying behaviour:

**Verbal or Written Acts**

o saying mean and hurtful things to, or about, others

o making fun of others

o calling another pupil mean and hurtful names

o telling lies or spread false rumours about others

o try to make other pupils dislike another pupil/s

**Physical Acts**

o hitting

o kicking

o pushing

o shoving

o material harm, such as taking/stealing money or possessions or

causing damage to possessions

o omission (Exclusion)

o refusing to include someone in group work

**Electronic Acts**

o Using online platforms or other electronic communication to carry out many of the written acts noted above.

o Impersonating someone online to cause hurt.

o Sharing images (eg. photographs or videos) online to embarrass someone.

***It should be stressed that the above lists are not exhaustive and that other behaviours which fit with the definition may be considered bullying behaviour.***

Various motivations can often be behind bullying, including those named in the ‘Act’.

**These include, but are not limited to:**

o Age

o Appearance

o Breakdown in peer relationships

o Community background

o Political affiliation

o Gender identity

o Sexual orientation

o Pregnancy Marital status

o Race

o Religion

o Disability / SEN

o Ability

o Looked After Child status

o Young Carer status

**Bullying is an emotive issue, therefore it is essential that we ensure we use supportive, understanding language when discussing these matters. For that reason, we will not refer to a child as ‘a bully’, nor will we refer to a child as ‘a victim’. Instead, we will refer to the situation surrounding that child, for example:**

o a child displaying bullying behaviours;

o a child experiencing bullying behaviours.

**We encourage all members of the school community (including parents) to use this language when discussing bullying incidents.**

**Emotional and Physical harm:**

The definitions of emotional and physicalharmare set out in DE Guidance: In determining ‘harm’ we define:

**o Emotional or psychological harm as intentionally causing distress or anxiety by scaring, humiliating or affecting adversely a pupil’s self-esteem.**

**o Physical harm as intentionally hurting a pupil by causing injuries such as bruises, broken bones, burns or cuts.**

**6.0 PREVENTATIVE MEASURES**

The focus for all anti-bullying work should be on prevention in the first instance. School will undertake a number of key actions with the aim of preventing bullying and creating a safe learning environment. Examples of these include:

o Raising awareness and understanding of the positive behaviour expectations, as set out in the Positive Behaviour Policy;

o Promotion of anti-bullying messages through the curriculum eg. inclusion of age-appropriate material specific to individual subject areas related to bullying, positive behaviour and inclusion;

o Addressing issues such as the various forms of bullying, including the how and why it can happen, through PDMU (eg. sectarian, racist, homophobic, transphobic, disablist, etc.);

o Involvement in meaningful and supportive shared education projects, supporting pupils to explore, understand and respond to difference and diversity;

o Through the preventative curriculum actively promote positive emotional health, wellbeing and self-image (eg. mindfulness training);

o Participation in the NIABF annual Anti-Bullying Week activities;

o Engagement in key national and regional campaigns, eg Safer Internet Day, Good Relations Week, etc.

o Development of peer-led systems (eg. School Council) to support the delivery and promotion of key anti-bullying messaging within the school;

o Development of effective strategies for playground management, e.g. training for supervisors, zoning of playgrounds, inclusion of specific resources (playground buddies, anti-bullying ambassadors) and provision of a variety of play option to meet the needs of all pupils;

o Focused assemblies to raise awareness and promote understanding of key issues related to bullying;

o Development of effective strategies for the management of unstructured times (eg. break time, lunch);

o Provision and promotion of extra- and co-curricular activities, aimed at supporting the development of effective peer support relationships and networks. For example sporting activity, creative arts, leisure and games, etc.

o Encouraging our families to support emotional behaviour and develop the skills of verbal communication with their children.

To help prevent bullying on the way to and from school, we will:

o Develop a culture where pupils take pride in their school and are viewed as ambassadors for their school within the community. This includes regular reminders of the positive behaviour expectations of pupils whilst travelling to and from school and when in uniform outside of school e.g. school trips, community visits;

o Take measures to empower pupils to challenge inappropriate and unacceptable behaviour of their peers during the journey to and from school as deemed appropriate for the age and stage of the child. This may include the implementation of peer monitoring systems on the bus;

o Seek to have regular engagement with transport providers (EA Transport, etc.) to ensure effective communication and the early identification of any concerns;

o Promote key anti-bullying messages and awareness of behaviour expectations of pupils amongst the local community (eg. local shops, cafes, service providers, residents, etc), including information on how to raise any concerns with the school;

**The new legislation also gives schools the authority to take steps to prevent bullying through the use of electronic communication amongst pupils at any time during term, where that behaviour is likely to have a detrimental effect on the pupil’s education at school.**

We will raise awareness of the nature and impact of online bullying and support our pupils to make use of the internet in a safe, responsible, and respectful way through the following methods:

o Addressing key themes of online behaviour and risk through PDMU, including understanding how to respond to harm and the consequences of inappropriate use;

o Participation in Anti-Bullying Week activities;

o Engagement with key statutory and voluntary sector agencies (eg. C2K, PSNI, Public Health Agency, Safeguarding Board for NI e-Safety Forum) to support the promotion of key messages;

o Participation in annual Safer Internet Day and promotion of key messages throughout the year;

o Development and implementation of robust and appropriate policies in related areas

**7.0 RESPONSIBILITIES**

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| **Board of Governors Chairperson** | **Stacy McKee \*Subject to change February 2025** |
| **Governor with Safeguarding Responsibilities** | **Rev. Martin \*Subject to change February 2025** |
| **Designated Teacher for Child Protection** | **Mr C McGilligan** |
| **Deputy Designated Teacher for Child Protection** | **Mr A Steen** |
| **Principal** | **Mrs S Russell** |
| **Pastoral support team** | **Mr C McGilligan**  **Mrs M Mullin**  **Mrs R Milea** |

Everyone has responsibility for creating a safe and supportive learning environment for all members of the school communities.

Everyone in the school community, including pupils, their parents/carers and the staff of the school are expected to respect the rights of others to be safe.

**Everyone has the responsibility to work together to:**

o ensure their body language, visual expressions, words and tone of voice are friendly;

o foster positive self-esteem;

o behave towards others in a mutually respectful way;

o model high standards of personal pro-social behaviour be alert to

signs of distress\* and other possible indications of bullying behaviour;

o inform the school of any concerns relating to bullying behaviour;

o refrain from becoming involved in any kind of bullying behaviour, even at the risk of incurring temporary unpopularity;

o refrain from retaliating to any form of bullying behaviour;

o intervene to support any person who is being bullied, unless it is unsafe to do so;

o report any concerns or instances of bullying behaviour witnessed or suspected, to a member of staff;

o emphasise the importance of seeking help from a trusted adult about bullying behaviour when it happens or is observed;

o explain the implications of allowing the bullying behaviour to continue unchecked, for themselves and/or others;

o listen sensitively to anyone who has been bullied, take what is said seriously, and provide reassurance that appropriate action will be taken;

o know how to seek support – internal and external;

o resolve difficulties in restorative ways to prevent recurring bullying behaviour and meet the needs of all parties.

**7.1 The Responsibilities of the Board of Governors:**

The Board of Governors must:

(a) ensure that policies designed to prevent bullying involving a registered pupil at the school are pursued at the school.

(b) determine the measures to be taken at the school (whether by the Board of Governors, the staff of the school or other persons) with a view to preventing bullying involving a registered pupil at the school:

▪ in school, during the school day;

▪ while travelling to and from school;

▪ when under control of school staff, but away from school (Eg. School trip, residential trip, swimming etc).

▪ When receiving education organised by school but happening elsewhere (eg. In another school);

***▪ Requires this policy is updated/reviewed at least every four years or at such times as the Department of Education / Education Training Inspectorate may direct or in light of new legislation or as a result of an incident.***

(c) in determining or reviewing those measures, have due regard to any guidance given by the Department of Education:

(d) prepare a written statement of such measures and secure that:

I. a copy of that statement is given or otherwise made available in such a form as the Board of Governors considers appropriate, to the parents/carers of all registered pupils at the school and to the staff of the school;

II. copies of the statement are available for inspection at the school at all reasonable times in such form as the Board of Governors considers appropriate: and

III. secure that such measures are taken.

**Duty to keep a record of incidents of bullying**

The Board of Governors must ensure that a record is kept of bullying incidents or alleged bullying that occur:

A record must:

(a) state what, from all of the circumstances, appears to be the motivation of the incident;

(b) state the methods of bullying as defined in the definition above: and

(c) include information about how the incident was addressed.

This will be communicated by Mr C McGilligan/Mrs Russell through Board of Governors meetings.

**7.1 The Responsibilities of Staff**

Our staff will:

• be consistent in approach when dealing with bullying concerns/behaviour;

• foster in our pupils’ self-esteem, self-respect and respect for others;

• demonstrate by example the high standards of personal and social behaviour we expect of our pupils;

• discuss bullying with all classes, so that every child learns about the damage it causes to both the child who is bullied and to the bully, and the importance of telling a teacher about bullying when it happens;

• be alert to signs of distress and other possible indications of bullying;

• listen to children who have been bullied, take what they say seriously and act to support and protect them;

• deal with observed instances of bullying promptly and effectively;

• keep a record of alleged/observed incidents;

• check all the facts before determining whether or not bullying has taken place;

• keep parents/carers informed;

• use of the curriculum to address issues of bullying and how pupils can deal with it (Circle Time and the Learning Area of Personal Development and Mutual Understanding are particularly relevant in addressing the needs of the children);

• make use of inter-board Anti-Bullying Week materials (NIABF);

• access agencies as required to support the school’s position in trying to eradicate incidents of bullying. Examples of agencies/organisations that presently support the school in its anti-bullying programme include, PSNI, NSPCC, the Education Welfare Service and ‘Gateway’.

**7.2 The Responsibilities of Pupils**

We expect our pupils to:

• report concerns of bullying to staff at once or as soon as is practical. This will help staff to investigate concerns quickly and without information potentially being distorted;

• refrain from becoming involved in any kind of bullying, even at the risk of incurring temporary unpopularity;

• intervene to protect the pupil who is being targeted, unless it is unsafe to do so;

• report to a member of staff any witnessed or suspected instances of bullying, to dispel any climate of secrecy and help to prevent further instances.

**Any pupil who becomes the target of a pupil displaying bullying behaviour should:**

• not suffer in silence, but have the courage to speak out, to put an end to their own suffering and that of other potential targets.

**7.3 The Responsibilities of Parents/Carers**

We ask parents/carers to support their children and the school by:

• watching for signs of distress or unusual behaviour in their children, which might be evidence of bullying;

• advising their children to report any concerns to a member of staff as soon as possible. Parents/carers should also explain to their children the implications of allowing the bullying to continue unchecked, for themselves and for other pupils;

• advising their children not to retaliate violently to any form of bullying;

• being sympathetic and supportive towards their children, and reassuring them that appropriate action will be taken;

• informing the school of any suspected bullying, even if their children are not involved;

• checking all the facts – before determining whether bullying has occurred. (ie. the behaviour was deliberate, hurtful, targeted and repeated over a period of time).

• the target found it difficult to defend him/herself;

• co-operating with the school, if their children are accused of bullying, try to ascertain the truth, and point out the implications of bullying, both for the children who are the target of bullying behaviours and for the pupil/s displaying bullying behaviours.

**7.4 The Responsibilities of All**

Everyone should:

• work together to combat and, hopefully in time, to eradicate bullying.

**8.0 REPORTING A BULLYING CONCERN**

Pupils Reporting a Concern Children and young people have told NIABF that when they have a concern about a potential bullying situation, they would like the opportunity to discuss this with a member of staff that they trust. Our pupils are encouraged to raise concerns with any member of staff, (teaching and non-support) in a way that they feel most comfortable with.

This may include:

o Verbally- talking to a member of staff;

o By writing a note to a member of staff (eg. in a homework diary);

o Asking a friend to speak to the teacher on their behalf

**ANY pupil can raise a concern about bullying behaviour**, not just the pupil who is experiencing this behaviour. Through the preventative work taken forward under Section 6, we encourage our school community to focus on ‘getting help’ rather than ‘telling’. As such, all pupils are encouraged to ‘get

help’ if they have a concern about bullying that they experience or is experienced by another.

**Parents/Carers Reporting a Concern**

We encourage our parents and carers to raise concerns about alleged bullying behaviour with the school at the earliest opportunity. We also acknowledge the importance in parents/carers encouraging their children to react appropriately to bullying behaviour and to not do anything to retaliate or to ‘hit back’.

**o In the first instance, all bullying concerns should be reported to the Class Teacher. The Class Teacher should formally record concerns via CPOMS and notify the Principal.**

**o Where the parent/carer is not satisfied that appropriate action has been taken to prevent further incidents, or where further incidents have taken place, the concern should be reported to Mrs Russell or Mr McGilligan in her absence.**

Where the parent/carer remains unsatisfied that the concern has not beenappropriately responded to, the school’s complaints procedure should befollowed. This involves making a formal, written complaint, to the Chair of theBoard of Governors.

While the majority of reports of bullying concerns will come from pupils and their parents/carers, Carhill Integrated Primary School is open to receiving such reports from anyone. All reports of bullying concerns received from pupils and/or parents/carers will be responded to in line with this policy and that feedback will be made to the person who made the report. However, it must be noted that ***no information about action taken in relation to a pupil can be disclosed to anyone other than the pupil and his/her parents/carers.***

**9.0 RESPONDING TO A BULLYING CONCERN**

The focus of any intervention will be on responding to the bullying concern and restoring the wellbeing of those involved. As such, any strategy for responding to bullying concerns must concentrate on the prevention of any further incidents.

The processes outlined below provides a framework for how the school will respond to any bullying concerns identified.

The Northern Ireland Anti-Bullying Forum (NIABF) Effective Responses to Bullying Behaviour Resource was designed to promote an anti-bullying culture in schools and help staff provide support both to pupils experiencing bullying and those who engage in bullying behaviour. It provides examples of anti-bullying strategies across four levels of intervention, providing schools with practical suggestions on how bullying can be addressed. Using the NIABF Effective Responses to Bullying Behaviour resource, the member of staff responsible shall…

**o clarify facts and perceptions;**

**o check records;**

**o assess the incident against the criteria for bullying behaviour;**

**o identify any themes or motivating factors;**

**o identify the type of bullying behaviour being displayed;**

**o identify intervention level;**

**o select and implement appropriate interventions for all pupils involved, including appropriate interventions, consequences and sanctions not listed in the Effective Responses to Bullying Behaviour resource;**

**o track, monitor and record effectiveness of interventions/review outcome of interventions;**

**o select and implement further interventions as necessary.**

NIABF advocates a restorative approach to responding to bullying behaviour.

Interventions suggested in the Effective Responses to Bullying Behaviour resource focus on responding to the behaviour, resolving the concern, and restoring the wellbeing of those involved. Carhill Integrated Primary School supports and uses this approach.

The steps taken against a pupil, who displays bullying behaviour will depend on the seriousness of the case, but may include one or more of the following:

**• The child being moved within the class, canteen or school transport to an area of greater supervision (e.g. closer to a member of staff)**

**• being subject to careful monitoring of behaviour/social interaction until staff are satisfied that the problem has stopped;**

**• being kept in at break time and/or lunch time;**

**• missed golden time**

**• losing any privileges or position of responsibility he/she holds in the school;**

**• being placed on report;**

**• being suspended in accordance with the Education Authority’s procedures;**

**• facing expulsion in accordance with Education Authority’s procedures.**

Depending on the needs of a pupil, it may be appropriate to provide staff support beyond that of the child’s class teacher in the form of behaviour management programmes etc.

Where bullying behaviours are maintained, school staff shall implement interventions aimed at responding to the behaviour, resolving the concern and restoring the wellbeing of those involved. Where appropriate, school staff may implement sanctions for those displaying bullying behaviour.

***Information regarding any action taken regarding a pupil cannot be disclosed to anyone other than that pupil and his/her parents/carers.***

**10.0 RECORDING**

The Addressing Bullying in Schools Act (NI) 2016, requires schools to maintain a record of all incidents of bullying and alleged bullying behaviour. The school will centrally record all relevant information related to reports of bullying concerns, including:

**o how the bullying behaviour was displayed (the method);**

**o the motivation for the behaviour;**

**o how each incident was addressed by the school;**

**o the outcome of the interventions employed.**

Records will be kept on CPOMS, which is part of our Child Protection and Safeguarding system used within school. Access to these records will be restricted and only provided to those members of school staff with a legitimate need to have access.

All records will be maintained in line with relevant data protection legislation and guidance. Information regarding incidents of bullying behaviour and alleged bullying behaviour will be used to inform the future development of anti-bullying policy and practice within the school.

**11.0 PROFESSIONAL DEVELOPMENT OF STAFF**

Carhill Integrated Primary School is committed to:

o ensuring that staff are provided with appropriate opportunities for professional development as part of the school’s ongoing CPD/PRSD provisions;

o noting the impact of the training given on both the policy and its procedures - e.g. any amendments made, inclusions added etc.

o ensuring that opportunities for safeguarding training are afforded to Governors and all staff – teaching and support;

o stating that CPD records will be kept and updated regularly.

**12.0 LINKS WITH OTHER POLICIES**

In the development and implementation of this anti-bullying policy, the Board of Governors has been mindful of related policies, including:

This policy is linked with the following school policies:

• Positive Behaviour Policy;

• Pastoral Care Policy;

• Safeguarding and Child Protection Policy

• Code of Conduct for Staff and Volunteers;

• Special Educational Needs Policy;

• Health and Safety Policy;

• Relationships and Sexuality Education;

• E-Safety Policy & Acceptable Use of Internet Policy;

**13.0 MONITORING AND REVIEW OF POLICY**

To appropriately monitor the effectiveness of the Anti-Bullying Policy, the Board of Governors shall:

o Maintain a standing item on the agenda of each meeting of the Board where a report on recorded incidents of bullying will be noted;

o Identify trends and priorities for action;

o Assess the effectiveness of strategies aimed at preventing bullying behaviour;

o Assess the effectiveness of strategies aimed at responding to bullying behaviour.

This Anti-Bullying Policy shall be reviewed as required, in consultation with pupils and their parents/carers as deemed necessary no later than Autumn 2026.