Anti-Bullying Policy

Holme Court School Devon

April 2026

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1 Aims

1.1 This is the anti-bullying policy of Holme Court School Devon.

1.2 The aims of this policy are:

1.2.1 to actively promote and safeguard the welfare of pupils at the School;

1.2.2 to maintain and drive a positive and supportive culture among all pupils and staff throughout the School; and

1.2.3 to prevent bullying, detect it when it occurs, and respond to it appropriately on a case-by-case basis.

2 Scope and application

2.1 This policy applies to the whole School .

2.2 This policy applies at all times when the pupil is:

2.2.1 in or at School;

2.2.2 representing the School or wearing School uniform;

2.2.3 travelling to or from School;

2.2.4 on School-organised trips;

2.2.5 associated with the School at any time;

2.2.6 in the care of the School or not and the School becomes aware of an incident of bullying.

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

2.3.1 affect the health, safety or well-being of a member of the School community or a member of the public;

2.3.2 have repercussions for the orderly running of the School; or

2.3.3 bring the School into disrepute.

3 Regulatory framework

3.1 This policy has been prepared to meet the School's responsibilities under:

3.1.1 Education (Independent School Standards) Regulations 2014 (as updated 2026) ;

3.1.2 Statutory framework for the Early Years Foundation Stage (DfE, September 2025);

3.1.3 Education and Skills Act 2008;

3.1.4 Childcare Act 2006;

3.1.5 Data Protection Act 2018 and General Data Protection Regulation (UK GDPR) Last updated March 2023; and

3.1.6 Equality Act 2010.

3.2 This policy has regard to the following guidance and advice:

3.2.1 Preventing and tackling bullying: Advice for headteachers, staff and governing bodies (DfE, July 2017);

3.2.2 Cyberbullying: advice for headteachers and school staff (DfE, November 2014);

3.2.3 Working together to safeguard children (DfE, March 2026); and

3.2.4 Keeping children safe in education (DfE, September 2026).

3.3 The following School policies, procedures and resource materials are relevant to this policy:

3.3.1 behaviour and discipline policy;

3.3.2 acceptable use policy for pupils;

3.3.3 safeguarding and child protection policy;

3.3.4 complaints policy;

3.3.5 special educational needs policy; and

3.3.6 online safety policy.

4 Responsibility statement and allocation of tasks

4.1 The Proprietor has overall responsibility for all matters which are the subject of this policy.

4.2 To ensure the efficient discharge of its responsibilities under this policy, the Proprietor has allocated the following tasks:

Task	**Allocated to**	**When / frequency of review**
Keeping the policy up to date and compliant with the law and best practice	Head	As required, and at least annually
Monitoring the implementation of the policy, relevant risk assessments and any action taken in response and evaluating effectiveness	Head	As required, and at least annually
Maintaining up to date records of all information created in relation to the policy and its implementation as required by the GDPR	Head	As required, and at least annually
Seeking input from interested groups (such as pupils, staff, parents) to consider improvements to the School's processes under the policy	Head	As required, and at least annually

Task	Allocated to	When / frequency of review
Formal review	Proprietor	As required, and at least once every 2 years

5 Publication and availability

5.1 This policy is published on the School website, and a hard copy is available from the School office on request.

5.2 This policy can be made available in large print or other accessible format if required.

6 Definitions

6.1 Where the following words or phrases are used in this policy:

6.1.1 References to the **Head** may include deputies.

6.1.2 References to **Parent** or **Parents** includes one or both of the parents, a legal guardian or education guardian.

7 Bullying

7.1 Bullying is always unacceptable and will not be dismissed as being normal or as "banter" or simply "part of growing up". Bullying will not be tolerated by the School because:

7.1.1 it is harmful to the person who is bullied, to those who engage in bullying behaviour, and those who support them, and can in some cases lead to lasting psychological damage and even suicide;

7.1.2 it interferes with a pupil's right to enjoy his / her learning and leisure time free from intimidation;

7.1.3 it is contrary to all our aims and values, our internal culture and the reputation of the School.

7.2 Bullying is behaviour by an individual or group, that intentionally hurts another individual or group either physically or emotionally. Bullying is often motivated by prejudice against particular groups. Bullying may be:

7.2.1 **Physical**: hitting, kicking, pushing people around, spitting, or taking, damaging or hiding possessions

7.2.2 **Verbal**: name-calling, taunting, teasing, insulting or demanding money

7.2.3 **Exclusionary behaviour**: intimidating, isolating or excluding a person from a group

7.2.4 **General unkindness**: spreading rumours or writing unkind notes, mobile phone texts or emails;

7.2.5 **Low level disruptive behaviour:** wearing "banter" and "horseplay" over a prolonged period of time;

7.2.6 **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 1 to this policy for guidance for pupils about cyberbullying. The School's

separate Online and E-Safety Policy sets out the School rules about the use of technology including mobile electronic devices.

7.2.7 **Harmful sexual behaviours**: includes sexual harassment and sexual violence:

(a) **sexual harassment**: unwanted conduct of a sexual nature that can occur online and offline. It can include but is not limited to:

(i) sexual jokes or taunting;

(ii) physical behaviour such as deliberately brushing against someone, interfering with their clothes, displaying pictures, photos or drawings of a sexual nature;

(iii) online sexual harassment which may include: non-consensual sharing of sexual images and videos (sexting); inappropriate sexual comments on social media; exploitation; coercion and threats.

Incidences of sexual harassment will be investigated to ensure they are not part of a wider pattern of sexual harassment and / or sexual violence.

(b) **sexual violence**: sexual offences under the Sexual Offences Act 2003, specifically rape, assault by penetration and sexual assault.

7.3 Bullying may also be:

7.3.1 sexist: related to a person's sex or gender reassignment;

7.3.2 racist, or regarding someone's religion, belief or culture;

7.3.3 related to a person's sexual orientation (homophobic bullying);

7.3.4 related to pregnancy and maternity;

7.3.5 related to a person's home circumstances; or

7.3.6 related to a person's disability, special educational needs, learning difficulty, health or appearance.

7.4 Not all bullying is deliberate or intended to hurt. Some individuals may see their hurtful conduct as "teasing" or "a game" or "for the good of" the other person. These forms of bullying are equally unacceptable but may not be malicious and can often be corrected quickly with advice and without disciplinary sanctions. If left unchallenged or dismissed low level disruption can have a wearing, and significant impact on targeted individuals exposed to such behaviour.

7.5 A person who makes a physical or sexual assault on another, or who steals or causes damage to the property of another, commits a criminal offence. Bullying may also be regarded as threatening behaviour or harassment which can be either a criminal offence or a civil wrong. Misuse of electronic communications could also be a criminal offence, for example it is an offence to send an electronic communication (such as a text message or email) to another person with the intent to cause distress or anxiety.

7.6 **Safeguarding**

7.6.1 Some behaviour by a pupil towards another may be of such a nature that safeguarding concerns are raised. Such behaviour may include bullying (including

cyberbullying), causing physical harm, initiation / hazing type violence and rituals, sexting or any form of sexual harassment or violence.

7.6.2 The School's policy and procedures with regard to peer on peer abuse are set out in the School's safeguarding and child protection policy and procedures. Concerns about a pupil's welfare because they are the victim or perpetrator of bullying behaviour must be reported in accordance with the safeguarding and child protection policy and procedures and appropriate action taken, taking into account any guidance provided by the Local Safeguarding Children Partnership.

7.6.3 The School will always treat a bullying incident as giving rise to a child protection concern when there is reasonable cause to believe that a child (whether victim or perpetrator) is suffering or likely to suffer significant harm.

8 Anti-bullying culture and systems

8.1 It is everyone's responsibility to ensure, whatever the circumstances, that no-one becomes a victim of bullying. A person may be vulnerable to bullying because of his / her age, physical appearance, nationality, colour, sex, sexual orientation, gender reassignment, religion or belief, culture or learning difficulty, disability, home circumstances or because he / she is new in the School, appears to be uncertain or has no friends. He / She may also become a target because of an irrational decision by a bully.

8.2 Our expectation of all members of the School community is that:

8.2.1 everyone will uphold the School rules;

8.2.2 a pupil or a member of staff or volunteer who witnesses or hears of an incident of bullying will report it in accordance with the terms of this policy;

8.2.3 a complaint of bullying will always be taken seriously;

8.2.4 no-one will tolerate unkind actions or remarks or stand by when someone else is being bullied.

8.3 In School and in every year group:

8.3.1 discriminatory and offensive words and behaviour are treated as unacceptable;

8.3.2 positive attitudes are fostered towards people who are disabled and towards ethnic, religious, cultural and linguistic groups within and outside the School; and

8.3.3 positive attitudes are fostered towards gender and sexuality differences through the curriculum and tutorials.

8.4 **Proprietor**

8.4.1 The Proprietor has overall responsibility for promoting and safeguarding the welfare of pupils at the School, ensuring that those in leadership and management positions actively promote pupil well-being. This includes ensuring that policies and procedures are in place and implemented effectively to:

(a) minimise the risk of bullying at the School so that pupils and staff feel safe and secure;

(b) intervene early in low-level disruption to prevent negative behaviours escalating;

(c) deal swiftly with allegations and incidents of bullying at the School so that pupils and staff feel confident that all incidents will be dealt with appropriately;

(d) consider incidences of sexual harassment in broad terms so that it is challenged in order to prevent the normalisation of behaviours which can provide an environment that may lead to sexual violence.

8.5 **Staff**

8.5.1 Through their training and experience, members of staff and volunteers are expected to promote an anti-bullying culture by:

(a) celebrating achievement;

(b) anticipating problems and providing support;

(c) adopting a proactive interactive approach to bullying by gathering intelligence about issues between pupils which might provoke conflict and developing strategies to prevent bullying occurring in the first place;

(d) disciplining perpetrators fairly, consistently and reasonably, taking into account any special educational needs or disabilities of the pupil, taking into account the motivations and any underlying safety concerns of the perpetrator and providing support as appropriate;

(e) making opportunities to listen to pupils;

(f) acting as advocates of pupils.

8.5.2 Members of staff and volunteers are vigilant at all times but particularly:

(a) at the start and end of the school day when pupils arrive and leave the site;

(b) before lessons;

(c) in the queue for the dining hall and in the dining hall itself;

(d) in School corridors;

(e) on School transport / School trips.

8.5.3 Pupil welfare and bullying is discussed in weekly staff meetings. The result of these meetings is to feed back information about friendship patterns, particular incidents, any pupil who seems to be isolated, any growing "power base" and any known conflict between pupils so that strategies can be developed to prevent bullying incidents. Teachers or support staff who do not attend the weekly meetings are required to inform the Head of any pupils or incidents of which the whole staff needs to be aware prior to the meeting. The minutes of each meeting are recorded and accessible to teachers and support staff.

8.6 **Pupils**

8.6.1 Through the School's pastoral care systems, pupils are informed and taught that bullying will not be tolerated in the School. They are encouraged:

(a) to celebrate the effort and achievements of others;

(b) to hold and promote positive attitudes;

(c) to feel able to share problems with staff;

(d) to turn to someone they trust, if they have a problem;

(e) not to feel guilty about airing complaints;

(f) to be kind, considerate and tolerant towards others;

(g) to be aware of the impact their behaviour can have on others;

(h) to challenge their peers if they are unkind to others;

(i) to use technology safely and securely and to be aware of the risks and impact of the use of technology on themselves and others.

8.6.2 Measures are taken throughout each year to educate pupils about bullying and this policy. These measures include:

(a) the PSHE curriculum includes lessons on bullying;

(b) anti-bullying posters placed around the School;

(c) anti-bullying messages are given in assemblies;

(d) once a year, in November, we hold an anti-bullying week/Friendship week;

(e) online safety is a key aspect of all areas of the curriculum. Parents are informed about online safety issues and the School's strategies to safeguard pupils through correspondence and annual events held by the School to raise awareness. See the School's online safety policy for further information about the School's online safety strategy;

(f) due to the high staff:child ratio pupils are supervised closely. Supervision ratio is 1:2/1:3. Due to the additional needs of the pupils adults are constantly modelling appropriate behaviour and implicitly teaching social interaction skills, to encourage the pupils to develop positive relationships with others.

8.6.3 The School recognises that children with special educational needs and disabilities can face additional safeguarding challenges, including the potential to be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs. The School considers extra pastoral support for pupils with special educational needs and disabilities.

8.7 **Parents**

8.7.1 The School will take active measures to promote an anti-bullying culture and message to parents that bullying amongst pupils or towards staff will not be tolerated by the School.

9 Reporting concerns

9.1 Pupils

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

(a) tell their parents, teacher or any member of staff at the School;

(b) the use of visuals such as feelings boards and communication boards are used daily and throughout the school to support communication between pupils and staff;

(c) contact Childline (0800 1111).

9.2 Parents

9.2.1 Parents who are concerned that their child is being bullied should inform their child's Class Teacher / Form Tutor without delay.

9.3 Staff

9.3.1 A member of staff or volunteer who learns of alleged bullying behaviour should:

(a) respond quickly and sensitively by offering advice, support and reassurance to the alleged victim;

(b) listen carefully and keep an open mind;

(c) not ask leading questions;

(d) reassure the child but not give a guarantee of confidentiality;

(e) report the allegation to the Designated Safeguarding Lead (DSL) as soon as possible;

9.3.2 The DSL must contact the relevant Class Teacher to agree on a strategy for dealing with the matter.

9.3.3 If the alleged bullying behaviour raises a safeguarding concern, the matter should be reported in accordance with the School's safeguarding and child protection policy and procedures before further investigation is carried out. In the case of bullying potentially involving harmful sexual behaviours, staff will follow guidance set out in Part 5 of KCSIE.

9.3.4 This policy focuses mainly on the bullying of pupils by pupils although it is recognised that a staff member could be a victim of and on occasion may be perceived to be the perpetrator of bullying behaviour. The bullying of staff, whether by pupils, parents or other colleagues, is unacceptable. Staff members who are concerned about being bullied or harassed should refer to the School's Staff Handbook. Pupils and parents who feel that a member of staff is bullying should report this in accordance with the procedures set out above.

10 Why incidents might not be reported

10.1 There are many reasons why a pupil who has suffered bullying may be reluctant to report it. He / She may become demoralised and may think, for example:

10.1.1 it is telling tales;

10.1.2 they won't believe me because the person I am complaining about is popular and I am not, and I will become even more unpopular;

10.1.3 the things they are saying and doing are too embarrassing to discuss with an adult;

10.1.4 it is all my fault anyway for being overweight / too studious etc;

10.1.5 there are too many of them; there is nothing the staff can do;

10.1.6 it will get back to my parents and they will think less of me;

10.1.7 I will just try and toughen up and grow a thicker skin;

10.1.8 I will lie low and not draw attention to myself;

10.1.9 this is a normal part of growing up and going to school.

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

10.2.1 it is "grassing" and I will become unpopular;

10.2.2 it is not my concern anyway;

10.2.3 I don't like the victim and I would find it embarrassing to be associated with him / her.

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

10.3.1 every concern or complaint of bullying will be taken seriously;

10.3.2 members of staff and volunteers will deal with a complaint correctly and effectively in accordance with their experience and the training they have received;

10.3.3 there is a solution to nearly every problem of bullying;

10.3.4 a pupil who complains will receive support and advice and in many cases the problem can be dealt with on a no-names basis;

10.3.5 the primary aim will be for the bullying to cease, not the punishment of the bully unless this is necessary;

10.3.6 we may need to support the bully as well so we can address the causes of bullying behaviour.

11 Assessment of concerns

11.1 The DSL will normally see the victim and (unless the case is very serious) any witnesses without delay and form an initial view of the allegation. The assessment will consider:

11.1.1 the nature of the incident(s): physical? sexual? verbal? exclusionary? etc

11.1.2 is it a "one-off" incident involving an individual or a group?

11.1.3 is it part of a pattern of behaviour by an individual or a group?

11.1.4 has physical injury been caused?

11.1.5 who should be informed: Head? Parents? the School's Designated Safeguarding Lead? children's social care? the police?

11.1.6 can the alleged bully be questioned without disclosing the victim's identity?

11.1.7 what is the likely outcome if the allegation proves to be correct?

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

11.2.1 there has been a misunderstanding which can be explained sympathetically to the alleged victim with advice to the alleged bully; or

11.2.2 the complaint is justified in whole or in part, and further action will be needed.

11.3 If at any stage the alleged bullying behaviour raises a safeguarding concern, the School's safeguarding and child protection policy and procedures should be followed before further investigation is carried out. This will always be the case where 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 policy on sexting.

11.4 Otherwise, in cases where the DSL believes that serious bullying behaviour has occurred involving a pupil or has recurred after warnings have been given to the "bully" he / she will refer the matter to the Proprietor or Safeguarding Board Level lead.

11.5 The DSL will:

11.5.1 interview the alleged victim, bully and any witnesses separately, in order to establish the facts of the case. They may decide to ask another senior member of staff to be present; and

11.5.2 send a summary of their findings to the Head and other relevant staff.

11.6 Together with the Proprietor, the DSL will decide on the action to be taken in accordance with this policy.

11.7 The Head will notify the parents of the victim and bully giving them details of the case and the action being taken. Such action may include further investigation and action in accordance with the School's behaviour and discipline policy.

12 Response to concerns

12.1 When a concern or complaint of bullying behaviour is upheld, the range of responses may include one or more of the following:

12.1.1 consideration as to whether the bullying incident should be addressed as a safeguarding concern and if so, the School's safeguarding and child protection policy and procedures will be followed;

12.1.2 advice and support for the victim and, where appropriate, establishing a course of action to help the victim, including support from external services where appropriate;

12.1.3 advice and support to the bully in trying to change his / her behaviour. This may include clear instructions and a warning or final warning;

12.1.4 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. If these considerations give rise to safeguarding concerns relating to the bullying, the School's child protection procedures will be followed;

12.1.5 a supervised meeting between the bully and the victim to discuss their differences and the ways in which they may be able to avoid future conflict (only with the victim's express agreement);

12.1.6 a disciplinary sanction against the bully, in accordance with the School's behaviour and discipline policy. In a very serious case or a case of persistent bullying, a pupil may be required to leave the School permanently in accordance with the School's behaviour and discipline 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 pupils;

12.1.7 action to break up a "power base";

12.1.8 confiscation of mobile electronic devices, increased monitoring procedures or limiting access to the School's internet and email facilities if cyberbullying has taken place (see also the School's acceptable use policy for pupils);

12.1.9 involving children's social care or the police;

12.1.10 notifying the parents of one or both pupils about the case and the action which has been taken;

12.1.11 such other action as may appear to the Head to be appropriate.

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

12.2.1 sharing information with some or all colleagues so that they may be alert to the need to monitor certain pupils closely;

12.2.2 ongoing counselling and support;

12.2.3 vigilance;

12.2.4 mentioning the incident at meetings of staff;

12.2.5 reviewing vulnerable individuals and areas of the School.

13 Supporting those severely impacted by bullying

13.1 The School recognises that removing bullied pupils from school is disruptive and can make it difficult to reintegrate. The School understands in some circumstances, however, the consequences of being bullied may have had a severe impact on a pupil's social, emotional or mental health and may have impacted seriously on a pupil's ability to learn.

13.2 The School will do all that is reasonably possible to ensure bullied pupils continue to attend school and maintain their educational progression by putting in place proportionate short term alternative on-site provision plans where necessary.

13.3 If the pupil is considered to have significantly greater difficulty learning than the majority of those the same age because of the impact of the bullying, the School will consider whether the pupil will benefit from being assessed for special educational needs.

14 Training

14.1 Staff

14.1.1 The School ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff and volunteers understand what is expected of them by this policy and have the necessary knowledge and skills to carry out their roles especially:

(a) having an understanding of the groups who may be more vulnerable to bullying;

(b) awareness of the risk and indications of bullying, and how to deal with cases;

(c) counselling skills (including bereavement);

(d) awareness of the risks of peer-on-peer abuse including sexual violence and sexual harassment and how bullying may give rise to safeguarding concerns.

14.1.2 The level and frequency of training depends on role of the individual member of staff.

14.1.3 The School maintains written records of all staff training.

15 Risk assessment

15.1 Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed and appropriate action will be taken to reduce the risks identified.

15.2 The format of risk assessment may vary and may be included as part of the School's overall response to a welfare issue, including the use of individual pupil welfare plans (such as behaviour, healthcare and education plans, as appropriate). Regardless of the form used, the School's approach to promoting pupil welfare will be systematic and pupil focused.

15.3 The Head has overall responsibility for ensuring that matters which affect pupil welfare are adequately risk assessed and for ensuring that the relevant findings are implemented, monitored and evaluated.

16 Record keeping

16.1 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.

16.2 School staff maintain records of the welfare and development of individual pupils. Every complaint or report of bullying is recorded centrally and monitored to enable patterns to be identified, both in relation to individual pupils and across the school as a whole and to evaluate the effectiveness of the School's approach.

16.3 The DSL will maintain a centralised record of all allegations or reports of bullying, including details of those involved and the action taken.

16.4 The Head will 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.

16.5 The records created in accordance with this policy may contain personal data. The School has a privacy notice which explains how the School will use personal data about pupils and parents. This is published on the School's website. In addition, staff must ensure that they follow the School's data protection policies and procedures when handling personal data created in connection with this policy.

17 Version control

Date of adoption of this policy	April 2026
Date of last review of this policy	April 2026
Date for next review of this policy	April 2027
Policy owner (Holme Court School)	Head

Appendix 1 Cyberbullying: guidance for pupils

1 Cyberbullying is bullying that takes place using technology.

2 Pupils should remember the following:

2.1 use the security settings when using technology;

2.2 regularly change your password and keep it private;

2.3 always respect others - be careful what you say online and what images you send;

2.4 think before you send - whatever you send can be made public very quickly and could stay online forever;

2.5 if you or someone you know are being cyberbullied, **tell someone**. You have the right not to be harassed or bullied online. Tell an adult you trust - your parents, any member of staff or a helpline such as ChildLine on 0800 1111;

2.6 don't retaliate or reply online;

2.7 save the evidence - learn how to keep records of offending messages, pictures or online conversations. Ask someone if you are unsure how to do this. This will help to show what is happening and can be used by the School to investigate the matter;

2.8 block the bully. Most social media websites and online or mobile services allow you block someone who is behaving badly;

2.9 don't do nothing - if you see cyberbullying going on, support the victim and report the bullying.

3 You may find the following websites helpful:

3.1 http://www.childnet.com/young-people

3.2 https://www.thinkuknow.co.uk/

3.3 https://www.childline.org.uk/Explore/Bullying/Pages/online-bullying.aspx

3.4 https://www.saferinternet.org.uk/advice-centre/young-people

3.5 https://www.disrespectnobody.co.uk/

3.6 http://www.safetynetkids.org.uk/.

4 Please see the School's acceptable use policy for pupils which sets out the School rules about the use of technology including mobile electronic devices.