

Anti-Bullying

Regulatory Framework

This policy has been written to set out the process by which Queen Margaret's complies with paragraph 10 of the Education (Independent School Standards) (England) Regulations 2014 (as in force at the date of this policy) which provides, under Part 3 of those Regulations relating to Welfare, health and safety of pupils;

"The standard in this paragraph is met if the proprietor ensures that bullying at the school is prevented in so far as reasonably practicable, by the drawing up and implementation of an effective anti-bullying strategy".

This policy is part of the system by which the school complies with Standard 16 (Preventing Bullying) of the National Minimum Standards (NMS) for Boarding Schools (September 2022) (extract set out below). This policy covers, in particular, measures in place to combat bullying and to promote positive behaviour in that regard.

This policy has been drawn up with reference to the advice for Headteachers, Staff and Governing Bodies issued by the Department for Education entitled "Behaviour and Discipline in Schools" (January 2016) and should be read in conjunction with the following QM policies and documents that provide further for the school's compliance with Standard 16 in all its aspects:

- Safeguarding and Child Protection
- Behaviour (Girls)
- Behaviour (Staff)
- Equal Opportunities
- E-Safety
- IT Acceptable Use

NMS Part G: Promoting positive behaviour and relationships

Standard 16 - Preventing bullying

16.1 The school ensures that all forms of bullying (including cyberbullying, prejudice based and discriminatory), at the school, are prevented in so far as reasonably practicable, by the drawing up and implementation of a proactive and effective anti-bullying strategy. The strategy should include accessible and effective systems for children to report bullying.

16.2 Any instances of bullying are dealt with effectively. Staff take steps to help pupils to overcome the impact of bullying. All school staff are trained to recognise bullying and know who to go to, if required, in order to ensure bullying is dealt with.

16.3 The school's anti-bullying strategy should reflect that unlike at day schools, boarders who are being bullied (offline) cannot escape their bullies for long periods of time as they are not going home as often.

Aims and Objectives

QM aims to provide a safe and supportive environment in which the individual is valued and difference is celebrated rather than merely tolerated. The school recognises that girls can only flourish in a community based upon mutual respect, courtesy and tolerance. We are committed to providing a safe and caring environment that is free from disruption, violence, and any form of harassment so that every one of our students can develop to their full potential. All students should care for and support each other, inside and outside of School.

The School prides itself on its respect and mutual tolerance. Parents/guardians have an important role in supporting the School in maintaining high standards of behaviour. It is essential that there are consistent expectations of behaviour both at school, online and at home, and that the School and parents co-operate closely together.

This policy is available to parents of students and prospective students on our website and on request, It is also communicated to all staff and students.

Bullying, cyberbullying, harassment, victimisation and discrimination of students or staff will not be tolerated by the School. We treat all of our students and their parents fairly, and with consideration, and we expect them to respect the staff, the School and each other, in return. All forms of bullying are unacceptable at the School (including cyberbullying, prejudice-based and discriminatory bullying) and any instances of bullying will be recorded and, where appropriate, will result in disciplinary action in accordance with the School's Behaviour Policy.

This policy applies to all day and boarding students in the School and applies to actions undertaken both inside, and outside of the School.

The School is currently working towards accreditation with the Anti-Bullying Alliance.

Definition of Bullying

Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally.

Put another way, bullying is the intentional hurting, harming, or humiliating of another person. It may take many forms, including physical (including any threat of or use of violence of any kind), sexual (including the sharing of nudes/semi-nudes), verbal (including cyberbullying via text messages, email, social media, gaming, or other instant messages, and can include the use of images and video), and/or emotional (including by excluding, being sarcastic, name-calling, tormenting or spreading malicious rumours). It can involve manipulating a third party to tease or torment someone, or actions that fall short of direct participation, where someone encourages others to bully, or joins in with laughing at a victim. Bullying is often hidden and subtle. It can also be overt and intimidating, and often involves

an imbalance of power between the perpetrator(s) and the victim(s) whether that be a physical, psychological (knowing what upsets someone), or intellectual imbalance, or by the perpetrator(s) having access to the support of a group, or the capacity to socially isolate the victim(s).

Bullying can sometimes amount to child on child abuse, which is defined as abuse by one or more students against another student. It can be standalone or as part of wider abuse and can happen both inside and outside of school, and online. Further information about child on child abuse, including the procedures to follow when an incident on peer on peer abuse is reported can be found in the School's Safeguarding and Child Protection Policy.

Bullying is often motivated by prejudice against particular groups, and may involve actions or comments regarding a person's race, religion, sex, gender, sexual orientation, special education needs or disabilities (SEND) or certain health conditions, or because of a child's familial circumstances, such as they are adopted, in care or that they have caring responsibilities. Bullying may be motivated by actual differences between children, or perceived differences. For example, bullying can still be homophobic if directed towards a child that is perceived to be gay, whether or not this is the case.

Bullying can happen anywhere and at any time and can involve anyone - students, other young people, staff, and parents.

Where an incident of bullying causes or is likely to cause significant harm to a student, the School will follow the procedures set out in the School's Safeguarding and Child Protection Policy.

The school's response to bullying

At the School, we always treat bullying very seriously. It conflicts sharply with the School's social and moral principles, and potentially with its policy on equal opportunities for students, and will not be tolerated. When incidents of bullying do occur, they are dealt with quickly and taken seriously. The School will never dismiss or downplay bullying as "banter", "just having a laugh" or "part of growing up". All reported incidents of bullying will be dealt with by staff in accordance with this policy. Staff will reassure any victim(s) that they are being taken seriously and that they will be supported and kept safe.

The School understands that bullying can be so serious that it may cause physical, emotional, and psychological damage, such as eating disorders, self-harm and even suicide. Stopping violence and ensuring the immediate physical safety of students is the School's first priority, however, the School acknowledges that emotional bullying can be more damaging than physical bullying, and therefore staff will use their discretion when dealing with an incident of bullying within the parameters of this policy and the Behaviour Policy. Whilst bullying itself is not a specific criminal offence, there are criminal laws which apply to harassment, sexual violence and assault, sexting, the sharing of

nudes/semi-nudes (in certain circumstances), upskirting and to violent and threatening behaviour. No one deserves to be a victim of bullying; everybody has the right to be treated with respect.

The School recognises that children with SEND or certain health conditions can face additional safeguarding challenges and may be more prone to peer on peer group isolation or bullying (including prejudice-based bullying) than other children. The School also recognises that certain children may face additional barriers to reporting an incident because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

Pupils who are victims of bullying will always be supported and will be reassured that they will be kept safe. Pupils who have engaged in bullying behaviour will be subject to appropriate disciplinary sanction and will also, where possible, be supported in learning different ways of behaving and offered support for their own circumstances, where appropriate.

Bullying which occurs on school trips, online, or outside of the School's premises will not be tolerated any more than bullying on School premises. Teachers will, where appropriate, discipline students for misbehaviour online, outside school premises and outside school hours.

Signs of bullying

Changes in behaviour that may indicate that a student is being bullied include:

- Unwillingness to return to school;
- Displays of excessive anxiety, becoming withdrawn or unusually quiet;
- Failure to produce work, or producing unusually poor work, or work that appears to have been copied, interfered with, or spoilt by others;
- Books, bags, money, 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 Medical Centre with symptoms which may relate to stress or anxiety, such as stomach pains or headaches;
- Unexplained cuts and bruises;
- Frequent absence, erratic attendance, or late arrival to class;
- Choosing the company of adults rather than peers;
- Displaying repressed body language and poor eye contact;
- Difficulty in sleeping or experiencing nightmares; or
- Talking of suicide or running away from home or school.

Although there may be other causes of some of the above symptoms, a repetition or combination of these possible signs of bullying should be investigated by parents and teachers and reported / recorded, as appropriate, in accordance with this policy.

Bullying preventative measures

The School's response to bullying does not start at the point in which a student has been bullied. We take the following preventative measures in order to create an environment that prevents bullying from becoming a problem at the School in the first place:

Pupils

- The School promotes an ethos of good behaviour where students treat each other with respect at all times, inside and outside of school;
- All new students (including boarders) are briefed thoroughly on the School's expected standards of behaviour. They are told what to do if they encounter bullying. We guarantee that those who report bullying in good faith will not be punished, will be taken seriously and will be supported and kept safe;
- There is a 'guardian angel' system for new girls to help them settle into life at QM;
- The issue of bullying is raised in Assemblies, Chapel services and via PSHE lessons
- There are specific opportunities for girls to raise matters of concern:
 - Tutorials
 - Year group meetings with the Senior Tutor/Deputy Head Pastoral
 - At any time with one of their Housemistresses
 - Small discussion groups with the Chaplain
 - Prefects, Monitors and Heads of House at weekly House meetings
 - School Council
 - The Health and Wellbeing Centre which is staffed 08:00 -20:00 Monday - Saturday during term time
 - The Emotional Wellbeing Practitioner who can be contacted through HSMs or via email
- RS, English and Drama lessons often highlight the issue of bullying and reinforce the message that bullying is wrong and unacceptable.
- All of our students are encouraged to tell any member of staff at once if they are being bullied, or if they know or suspect that bullying is taking place. They are reassured that they will be taken seriously and will be supported and kept safe;
- All girls have access to a telephone and helpline numbers are displayed in the boarding houses;
- The Prefects receive training in Child Protection and Safeguarding which focuses on listening skills and supporting younger and vulnerable girls;

- The School buildings and all of our boarding houses display advice on where students can seek help, including details of confidential help lines and websites where they can connect with external specialists, such as ChildLine, Kidscape, Bullying UK, and the Samaritans;
- The school rule relating to bullying applies at all times, not just during term time;
- Potential victims are identified and mentoring or support measures put in place;
- The Emotional Wellbeing Practitioner provides a half termly report to the Deputy Head, listing the issues raised by girls, although not identities or details;
- QM has no tradition of initiation ceremonies designed to humiliate new girls

Staff

- All members of staff receive regular guidance on the school's anti-bullying policy and on how to react to allegations or observations of bullying and training takes place to ensure that the principles of the school policy are understood, legal responsibilities are known, action is defined to resolve and prevent problems, and sources of support are available.;
- The School recognises that certain children may be more at risk of bullying than others and may require additional support when dealing with an incident of bullying, for example children with SEND and/or certain health conditions, and LGBTQ+ students. If necessary the school will invest in specialised skills to understand the needs of girls, including those with special educational needs or disabilities, and lesbian, bisexual and transgender (LGBT) pupils;
- All reported incidents are recorded and investigated at once. We always monitor reported incidents. Records of any incidents are kept in order that patterns of behaviour can be identified and monitored;
- We have a strong and experienced pastoral team of Tutors, Heads of Year, and House Mistresses who support the Pastoral Deputy Head and are trained in handling any incidents as an immediate priority, and who are alert to possible signs of bullying and will know when to apply our Safeguarding and Child Protection Policy to bullying incidents;
- Our pastoral team gives support and guidance to other staff on handling and reporting incidents, and on the follow-up work with both victims and bullies;
- Our trained Emotional Wellbeing Practitioner is an important part of our pastoral support service, providing specialist skills of assessment and counselling. The Emotional Wellbeing Practitioner is available to give confidential advice and counselling support to students who can refer themselves when they have social, emotional, or behavioural concerns. On occasion, a member of our pastoral team may refer a student to the Emotional Wellbeing Practitioner as appropriate;
- The School Chaplain will give support and guidance to students of all faiths who are able to refer themselves to the Chaplain whenever they wish (for example at a time of family break-up, sickness, or bereavement). The Chaplain will provide confidential advice and seek

to encourage the development of tolerance, understanding and respect for others in a multi-faith community;

- Staff are always on duty at times when students are not in class and patrol the School site, particularly areas where bullying might occur. SLT are on supervision during lunchtimes and House staff are in house areas should there be any issues or concerns. They are trained to be alert to inappropriate language or behaviour at all times;
- In boarding houses, there are strong teams of tutors supporting the House Mistress. Staff are aware that boarding houses provide more opportunities for bullying and are therefore always vigilant and alert to signs of issues with or between boarders. A member of the boarding house staff is always on duty to supervise the students. The School will comply with its obligations as set out in the National Minimum Standards at all times.;
- The School has the right, and duty, to investigate incidents of bullying involving our students which take place outside school hours, on school visits and trips, online, or that otherwise occur outside of school. The School has the right to take disciplinary measures in respect of such incidents. Disciplinary measures will be taken in accordance with the School's Behaviour Policy and will be applied in a fair, consistent, and reasonable manner, taking into account the needs of students with SEND and certain health conditions, and vulnerable students; and
- Staff will always consider the motive behind bullying behaviour and whether it raises any concerns for the welfare of the perpetrator(s). If staff reasonably suspect that a student may be suffering, or is likely to suffer significant harm, they should follow the procedures set out in the School's Safeguarding Policy and Child Protection and discuss their concerns with the School's Designated Safeguarding Lead (DSL) without delay.

Parents

- This policy is readily available on the School's website and on request which parents are made aware of so that they are clear on the School's approach to bullying and what to do if their child experiences bullying;
- We encourage close contact between the House Mistress and parents/ guardians, and will always make contact if we are worried about a student's well-being;
- 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; and
- 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.

Procedures for dealing with reported bullying

The School ensures that all instances of, or concerns about bullying and cyberbullying, both on and away from school premises are easy to report and that they are recorded properly. Records of instances of bullying and allegations of bullying will be kept. Records will also be kept on files relating

to safeguarding where appropriate, in order to enable the School to identify patterns of behaviour and to evaluate the effectiveness of this anti-bullying policy.

The School recognises that students are likely to report bullying to someone they trust: this could be any member of staff. The School also recognises that children may not find it easy to tell staff about bullying verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. All staff are aware of the serious nature of any such allegations and will make a note of what has been said before passing this on to the DSL if needed, the Senior Tutor, House Staff or Tutor.

The School also recognises that a first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports seriously regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the victim(s) when they raise a concern.

Any suspicion of bullying should be reported to a girl's Tutor or Housemistress for investigation and monitoring.

- Any witnessed bullying must be challenged and dealt with immediately
- Any witnessed bullying must be reported to the Senior Deputy Head or the Deputy Head Pastoral on the form contained in Appendix I (hard copies of which are available in the Staff Room)
- The Senior Deputy Head or the Deputy Head Pastoral will, as soon as practicable after that report is received, discuss the allegations with the alleged victim's Housemistress, Tutor and Senior Tutor
- A written account of her version of events will be obtained from the alleged victim by her Housemistress
- The alleged bully will be interviewed by the Deputy Head Pastoral in the presence of her Housemistress and asked to write her account of events
- If it is the view of the Deputy Head Pastoral that bullying has taken place, the bully will be interviewed by the Deputy Head Pastoral and the Senior Deputy Head; it will be made clear why her behaviour was inappropriate and caused distress. She will be offered support to modify her behaviour. An appropriate sanction will be imposed and recorded.
- The victim will be offered support and advice
- Parents of the girl believed to have acted as a bully and parents of such other girls involved in the incident as it is thought appropriate to contact, will be informed of what has happened and invited to discuss the matter
- A meeting of all girls involved in the incident may be useful as a means of helping to close the episode and developing a strategy for avoiding such incidents in the future
- The Housemistress will monitor the situation
- In very serious cases the bullying incident must be referred immediately to the Designated Safeguarding Lead who will take over the handling of the episode and may, after consulting with the Head, decide to refer the matter to the police or social care services

- The threshold for reporting a bullying issue to external agencies is crossed if there is reasonable cause to believe that a child is suffering or likely to suffer significant harm.

Cyberbullying

The way in which students relate to one another online can have a significant impact on the culture at school. Negative interactions online can damage the school's culture and can lead to School feeling like an unsafe place. The School makes it clear to students that the same standards of behaviour are expected online as apply offline, and that everyone should be treated with kindness, respect and dignity.

Cyberbullying can be defined as *"the use of information and communication technologies to support deliberate, repeated, and hostile behaviour by an individual or group that is intended to harm others"* (Belsey, <http://www.cyberbullying.org/>). It is an aggressive, intentional act often carried out repeatedly over time, and often against a victim who cannot easily defend themselves. The School acknowledges that cyberbullying often takes place outside the school day and off the School premises.

Cyberbullying could involve communications by various electronic media, including for example:

- Texts, instant messages or calls on mobile phones;
- The use of mobile phone camera images to cause distress, fear, or humiliation;
- Posting threatening, abusive, sexual, discriminatory, offensive, or humiliating material or comments on websites (including blogs, personal websites, and social networking sites such as Facebook, Instagram, X (formerly known as Twitter) or YouTube);
- Using e-mail to message others in a threatening or abusive manner; or
- Hijacking/ cloning e-mail accounts.

The School acknowledges that cyberbullying may take many different forms including: cyberstalking, exclusion or peer rejection, impersonation, unauthorised publication of private information or images, encouraging derogative comments on online platforms, sharing nudes/semi-nudes, upskirting, and sexting.

The School has a role to play in teaching students about the underpinning knowledge and behaviours that can help them to navigate the online world safely and confidently regardless of the device, platform, or app. In taking this forward, the School has regard to the DfE's non-statutory guidance on *Teaching online safety in school* (January 2023).

Prevention of cyberbullying

For the prevention of cyberbullying, in addition to the measures described above, the School:

- Expects all students to adhere to the Online Safety Policy and IT Acceptable Use Policy.

- Certain sites are blocked by our filtering system which our DSL and IT Department monitors;
- May impose disciplinary sanctions for the misuse, or attempted misuse, of the internet in accordance with the Behaviour Policy;
- Issues all students with their own personal School email address. [Access to [all social media sites and] personal email sites such as "hotmail" is not allowed [from School computers/tablets] inside the School];
- Offers guidance on the safe use of social networking sites and cyberbullying in PSHE lessons, which covers blocking, removing contacts from "friend" or similar lists and sharing their personal data;
- Ensures its students are aware of the various forms in which cyberbullying can take place, that it can have severe and distressing consequences, and that participation in cyberbullying 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 classrooms, public areas of the School, or where they may cause annoyance, humiliation, or distress to others; and
- Does not allow the use of cameras/ mobile phone cameras in toilets, washing and changing areas [or in the bedrooms of boarding houses].

Procedures for dealing with cyberbullying

The School will follow the procedures set out in this policy and in the Safeguarding and Child Protection Policy where relevant for incidents of cyberbullying, 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 cyberbullying 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 cyberbullying may amount to a criminal offence, it will inform the Police.

Electronic devices

In response to an allegation of cyberbullying, 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, or an item that has been, or is likely to be, used to commit an offence, or to cause personal injury to any

person (including the student being searched), or cause damage to property, 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 Behaviour 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 cyberbullying. Parental consent to search through electronic devices is not required but they will be informed after the event unless doing so presents a further risk to any child.

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 a criminal 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 this policy and the Behaviour Policy. 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.

School staff can confiscate, retain or dispose of a student's property as a disciplinary penalty. The law protects staff from liability in any proceedings brought against them for any loss or damage to items they have confiscated, provided they acted lawfully. Staff will always consider whether confiscation is proportionate and consider any relevant special circumstances.

The School will keep a record of all searches carried out, including the results of any search, and the actions taken following that search.

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. Parents of boarders should be aware that they have the right to refer a complaint directly to Ofsted, if they are unhappy with the way in which their complaint has been handled.

Monitoring and review

The School will record all incidents of reported bullying in accordance with this policy.

The Senior Deputy Head and/or the Deputy Head Pastoral will review all incidents of reported bullying to help identify patterns of behaviour, so that the School can take appropriate steps to address bullying behaviours within the School. Records of bullying incidents will also be used to evaluate the effectiveness of the School's anti-bullying procedures, and to highlight any necessary amendments. These reviews are a standing item in the termly Governors' Pastoral Committee Meetings.

This policy is reviewed and updated annually.

Claire Sheard
Senior Deputy Head

Date Agreed: November 2023

Review Date: November 2024

Appendix I

Record of Alleged Bullying Incident

Following observation or reporting of an incident of alleged bullying please complete Section A of this form promptly and send to the Senior Deputy Head (or Deputy Head Pastoral in her absence)


Section A

Date, time and location of incident:

Girl(s) involved:

Details of incident:

Signed _____

Section B To be completed by the Deputy Head. Action taken 

1. Girl(s) Interviewed
2. Tutor informed
3. Senior Tutor/Housemistress/master informed
4. Parents contacted
5. Sanction

Outcome: