Anti-Bullying Policy

Trust-wide policy for pupils, staff and the wider school community

Policy owner	Director of Schools / Trust safeguarding lead
Approval body	Board of Trustees
Updated	September 2026
Review cycle	Annual, or earlier following a change in law or guidance
Next review	September 2027
Applies to	All schools and operations of Cornerstone Academy Trust

Policy status
This version replaces the March 2024 policy. It must be read with the Trust Behaviour, Safeguarding and Child Protection, Online Safety, Equality, Complaints, Staff Code of Conduct, Whistleblowing and Suspension and Permanent Exclusion policies.

1. Purpose and aims

Cornerstone Academy Trust is committed to a safe, respectful and inclusive culture in which bullying, harassment, discrimination and victimisation are not tolerated. This policy explains how the Trust prevents bullying, enables concerns to be reported, responds promptly and fairly, safeguards those affected, addresses harmful behaviour and learns from patterns of incidents.

- prevent all forms of bullying, including online and prejudice-related bullying
- make reporting routes clear, accessible and trusted
- respond in a child-centred, proportionate and timely way
- support pupils and adults affected by bullying
- address the behaviour, needs and circumstances of those who bully
- meet safeguarding, equality, behaviour, employment and health and safety duties
- use anonymised information to evaluate impact and improve practice

2. Scope

This policy applies to pupils, employees, trustees, volunteers, agency staff, contractors, visitors, parents and carers when their conduct is connected with the Trust or affects the safety, welfare, education or working environment of its community. It covers conduct on Trust premises, during Trust activities, while travelling to or from school, on work-related activity and online.

Safeguarding takes priority
Any concern that indicates a child may be at risk of harm must be passed immediately to the Designated Safeguarding Lead (DSL) or a deputy and managed under the Safeguarding and Child Protection Policy. Staff must not delay a safeguarding referral while deciding whether behaviour meets the definition of bullying.

3. Legal and guidance framework

The Trust will have regard, as applicable, to the following legislation and guidance:

- Education and Inspections Act 2006, including the duty to establish measures to encourage good behaviour and prevent all forms of bullying
- Equality Act 2010, including the Public Sector Equality Duty, reasonable adjustments and duties relating to discrimination, harassment and victimisation
- Children Act 1989 and Children Act 2004 safeguarding duties
- Education Act 2011 and schools' behaviour powers
- Keeping Children Safe in Education 2026
- Preventing and tackling bullying: advice for schools
- Behaviour in schools: advice for headteachers and school staff
- Suspension and permanent exclusion statutory guidance, effective 26 July 2026
- Preventing and tackling bullying and harassment of school staff, July 2026
- SEND Code of Practice: 0 to 25 years
- Devon County Council bullying, prejudice and racism incidents resources

4. Definitions

4.1 Bullying between pupils

Bullying is behaviour by an individual or group, usually repeated over time, that intentionally hurts another individual or group physically or emotionally and commonly involves an imbalance of power. The imbalance may be actual or perceived and may arise from status, number, age, ability, confidence, social influence, access to images or information, or control of online spaces.

A one-off incident may not meet this definition, but it can still be serious, discriminatory, harmful or a safeguarding concern. It must be recorded and responded to under the appropriate policy. A series of apparently low-level incidents may form a pattern and must be reviewed collectively.

4.2 Harassment, discrimination and victimisation

Harassment is unwanted conduct related to a relevant protected characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. Discrimination and victimisation are addressed under the Equality Policy and applicable law. Conduct does not need to be repeated before action is taken.

4.3 Bullying and harassment of staff

For adults, bullying may be repeated or a one-off incident causing harm, intimidation or offence, and may involve an imbalance of power. Workplace concerns will be handled under the appropriate employment procedure, with safeguarding procedures used where a child may be at risk.

5. Forms and contexts of bullying

Form or context	Examples
Physical	Hitting, kicking, pushing, damaging or taking possessions, intimidation or use of force.
Verbal	Name-calling, insults, threats, taunting, ridicule or malicious comments.
Social or relational	Exclusion, isolation, coercion, spreading rumours, manipulation of friendships or public humiliation.
Online or technology-assisted	Harmful messages or posts, impersonation, exclusion from online groups, sharing content without consent, or using digital tools to intimidate or humiliate.
Prejudice-related or identity-based	Conduct connected with an actual or perceived protected characteristic, SEND, appearance, family circumstance, care experience, health, language, nationality or another aspect of identity or association.
Property or economic	Taking, hiding, damaging or demanding money, food, possessions or access credentials.
Harmful conduct between children	Behaviour that may also constitute child-on-child abuse. This must be considered under safeguarding procedures and must never be dismissed as banter or an inevitable part of growing up.
Against staff or by staff	Bullying, intimidation or harassment involving employees, leaders, trustees, parents, carers or other adults, including online conduct.

6. Prevention

Each school will maintain a whole-school approach that includes:

- clear behavioural expectations, routines and consistent adult modelling
- a planned curriculum covering respectful relationships, equality, inclusion, online safety and how to seek help
- regular pupil voice, including accessible opportunities for pupils with SEND or communication needs
- staff induction and regular training on identification, recording, safeguarding, equality and responding to reports
- supervision and risk assessment informed by incident patterns and vulnerable times or locations

- safe and accessible reporting routes, including routes to a trusted adult
- proportionate engagement with parents and carers
- reasonable adjustments and targeted support for pupils whose needs or vulnerabilities affect risk
- work with external agencies where specialist advice or support is required
- regular communication that explains the difference between bullying, conflict, friendship difficulties and one-off harmful incidents without minimising any concern

7. Reporting a concern

Any pupil or adult can report a concern. Reports may be made verbally, in writing or through the school's agreed reporting route. A person may report something that happened to them, that they witnessed, or that they learned about from another person.

- Pupils: speak to any trusted member of staff. Staff must help the pupil access the route that is easiest and safest for them.
- Parents and carers: contact the class teacher or designated pastoral leader in the first instance, or the Head of School where the concern is serious or unresolved.
- Staff: report pupil concerns promptly to the relevant teacher or pastoral leader and to the DSL where there is any safeguarding element. Workplace bullying should be reported to the line manager or the next appropriate manager where the line manager is involved.
- Anonymous reports: will be considered and risk assessed, although the action possible may depend on the information available.
- Immediate risk or suspected crime: contact the DSL or a senior leader without delay. Emergency services should be contacted where there is an immediate danger.

No wrong door
The member of staff receiving a concern owns the immediate response: listen, reassure, record accurately and pass it to the correct person. A pupil or parent must not be sent away simply because they approached the "wrong" member of staff.

8. Responding to pupil reports

The response will be child-centred, impartial, proportionate and aligned with safeguarding and behaviour procedures. The following sequence is a framework, not a substitute for professional judgement or urgent safeguarding action.

Step	Action	Minimum expectation
1. Listen and protect	Take the report seriously, avoid blame, check immediate safety, explain what will happen next and do not promise confidentiality.	**Same day**
2. Record	Make a factual record using the correct categories. Distinguish fact, allegation, professional judgement and action taken. Record one-off prejudice-related incidents as well as confirmed or suspected bullying.	**Same working day**
3. Triage	Consider immediate safeguarding risk, protected characteristics, SEND and reasonable adjustments, online evidence, possible crime, risk of retaliation, and whether other pupils may be affected.	**Immediately**

4. Investigate	Gather accounts promptly and separately, using open questions. Review relevant records and preserve available evidence. Do not require the pupil who reported harm to confront the other pupil.	**Promptly**
5. Decide and communicate	Decide on the balance of probabilities whether the concern is substantiated, unsubstantiated or inconclusive. Record the rationale and communicate appropriate information to those involved, while respecting privacy.	**Without avoidable delay**
6. Act	Put support and safety measures in place. Apply educational, restorative and disciplinary responses in line with the Behaviour Policy. Avoid restorative approaches where they are unsafe, unwanted or likely to increase harm.	**As soon as decisions are made**
7. Review	Set named review dates, monitor safety and recurrence, check for retaliation and update the record. Close the case only when actions are complete and review indicates that risk is managed.	**At agreed intervals**

9. Safeguarding, police and external agencies

- The DSL will be involved where behaviour indicates a child may be at risk of harm, where there is child-on-child abuse, or where harmful behaviour may indicate unmet safeguarding needs in any child involved.
- The Trust will consider early help, children's social care, local authority services, health services and other specialist support in accordance with need and local arrangements.
- Where conduct may constitute a criminal offence, the school will consider police involvement. Staff should not delay safeguarding action or carry out activity that could interfere with a statutory investigation.
- Online material relevant to a concern should be preserved and handled in line with safeguarding, information security and data protection procedures. Staff must not ask pupils to forward harmful material unnecessarily.
- Bullying, prejudice and racism incidents will be reported to the local authority where required or appropriate under local arrangements.

10. Support and action

10.1 Support for the pupil affected

- a trusted adult and an agreed method for seeking help
- a safety plan where needed, including arrangements for lessons, social times, travel or online contact
- pastoral, therapeutic or specialist support appropriate to need
- reasonable adjustments for disability or SEND
- support to restore attendance, participation, confidence and learning
- regular review with the pupil, taking account of their wishes and best interests

10.2 Action for the pupil whose behaviour caused harm

- a clear explanation of the concern, findings and expected change
- a proportionate sanction under the Behaviour Policy where appropriate
- education, reflection, repair and targeted intervention
- assessment of unmet needs, vulnerability, SEND or safeguarding concerns
- a plan to prevent recurrence, with review points and parental involvement where appropriate

Suspension or permanent exclusion will never be automatic. Any decision must be made by the Headteacher or Head of School acting within delegated authority, on the facts of the individual case, in accordance with the Trust Behaviour Policy and current statutory guidance. Permanent exclusion is a last resort.

11. Online bullying and conduct outside school

The Trust may respond where behaviour outside school has an impact on pupils' safety, welfare, education, orderly running of the school or reputation of the Trust, or where it poses a threat to another pupil or member of the public. Any disciplinary action will be lawful, reasonable and consistent with the Behaviour Policy. The school will work with families, platform providers, police or other agencies as appropriate and will teach pupils how to block, report and seek help.

12. Parents, carers and confidentiality

- Parents and carers will normally be informed when their child is directly involved, subject to safeguarding, legal and confidentiality considerations.
- The school will explain the process, actions relevant to their child and review arrangements. It cannot disclose confidential personal information or sanctions relating to another child.
- Information will be shared on a need-to-know basis and processed under the Trust's data protection and records-management arrangements.
- Concerns about the handling of a case may be raised through the Trust Complaints Policy. A complaint does not prevent the school from continuing safeguarding or behaviour action.

13. Bullying and harassment involving adults

The Trust expects professional, respectful conduct and will take concerns about bullying, intimidation and harassment seriously. The route used will depend on who is involved and may include the Grievance, Disciplinary, Staff Code of Conduct, Whistleblowing, Complaints or Managing Allegations procedures. Concerns involving possible harm to a child must be referred under safeguarding and managing-allegations arrangements. Adults will be offered appropriate support, kept informed and protected from victimisation. Employers will take reasonable steps to prevent unlawful harassment and respond to concerns in line with employment and equality duties.

14. Recording, monitoring and governance

- All pupil incidents and actions will be recorded on CPOMS using agreed categories and linked where they form a pattern.
- Schools will monitor frequency, type, location, time, protected characteristic or prejudice factor, recurrence, attendance impact, groups disproportionately affected, response times and outcomes.
- Data reported to leaders and trustees will be anonymised or appropriately minimised. It will be analysed at least termly to test whether action is effective and identify training, curriculum, supervision or policy changes.
- The Head of School is accountable for operational implementation. The DSL leads safeguarding aspects. The Board of Trustees provides oversight and assurance.
- Records will be retained and transferred in accordance with statutory safeguarding guidance, the Trust retention schedule and data protection requirements.

15. Roles and responsibilities

Role	Core responsibility
Board of Trustees	Approve the policy, seek assurance about implementation and impact, and ensure equality and safeguarding duties are met.
Chief Executive Officer	Set Trust expectations, ensure supporting policies and systems align, and hold schools to account for implementation.

Head of School	Implement the policy, ensure concerns are addressed, allocate resources, communicate with families and report patterns to the Trust.
Designated Safeguarding Lead	Lead safeguarding triage, referrals, risk management and advice; ensure child-on-child abuse is addressed under safeguarding procedures.
Deputy Head	Coordinate investigations, support plans, follow-up and quality assurance of records as delegated.
All staff	Prevent, notice, listen, record, report and respond; never minimise harmful behaviour as banter.
Pupils	Treat others respectfully, report concerns, preserve relevant evidence safely and engage with support and education.
Parents and carers	Report concerns promptly, support agreed plans, avoid public or online action that may compromise children's privacy or an investigation.

16. Complaints, review and publication

This policy will be published on the Trust and school websites and made available in an accessible format on request. It will be reviewed annually and sooner where safeguarding learning, equality analysis, complaints, incident trends, local arrangements, legislation or statutory guidance require change. Concerns about implementation should be addressed through the Trust Complaints Policy. Employment concerns should use the relevant staff procedure.

Appendix 1: Staff response checklist

- ☐ Listen calmly and take the report seriously.
- ☐ Check immediate safety and urgent medical needs.
- ☐ Do not promise secrecy. Explain who needs to know and why.
- ☐ Record the pupil's words and relevant facts promptly.
- ☐ Notify the DSL immediately if there is any safeguarding concern.
- ☐ Consider prejudice, protected characteristics, SEND and reasonable adjustments.
- ☐ Preserve evidence safely; do not circulate harmful content.
- ☐ Separate accounts and avoid leading questions.
- ☐ Put interim safety measures in place.
- ☐ Record decisions, rationale, support, action and review dates.
- ☐ Inform parents or carers as appropriate.
- ☐ Monitor for recurrence, retaliation and impact on attendance or learning.

Appendix 2: Minimum Safeguarding record

- date, time, location and context
- who reported the concern and who received it
- children and adults involved, including witnesses
- the account in the reporter's own words where possible
- immediate safety and safeguarding action
- whether the incident is one-off, repeated, part of a pattern, prejudice-related or suspected bullying
- relevant protected characteristic, SEND, vulnerability or reasonable adjustment
- evidence reviewed and how it was preserved
- findings and rationale
- support, educational response and sanction, where applicable
- communication with parents, carers and agencies
- named person responsible and review date
- follow-up, impact and closure rationale

Appendix 3: Policy change summary

Area updated	Change made in September 2026
Legislation and guidance	Updated to KCSIE 2026, July 2026 DfE bullying guidance and July 2026 suspension/permanent exclusion guidance.
Safeguarding	Clear threshold for immediate DSL involvement and explicit child-on-child abuse response.
Definitions	Separates pupil bullying, one-off harmful incidents, harassment, discrimination and adult workplace bullying.
Equality and SEND	Adds protected-characteristic analysis, reasonable adjustments and accessible reporting.
Process	Adds a clear listen, record, triage, investigate, decide, act and review framework.
Exclusions	Removes the automatic escalation from temporary to permanent exclusion and replaces it with lawful, case-by-case decision-making.
Online and off-site conduct	Strengthens response to digital evidence and conduct outside school.

Adults and staff	Adds a route aligned with new DfE guidance on bullying and harassment of school staff.
Governance	Strengthens termly anonymised analysis, oversight and policy impact review.
Language and accuracy	Corrects roles, terminology and grammar, including consistent use of Head of School, DSL, parents and carers, and pupils.