City of London School Anti-Bullying Policy

0. Review of policy

0.1 This policy is reviewed annually by the Deputy Head Pastoral (in consultation with Heads of Section and Heads of Year) prior to approval by governors.

Last reviewed by:	Alice Martineau (Deputy Head (Pastoral))
Date last reviewed:	August 2025
Approved for Governors:	Board of Governors
Date approved:	8 October 2025

The School Values

The values at this School are defined by and rooted in our desire to teach pupils that are kind, ready and aware. The values that underpin this community encourage members to care for others as much as themselves, to understand the world we inhabit, and to be forward-looking into the 21st century. It is the expectation of all pupils to subscribe to these values in all that they do as members of The School. This policy is guided by these fundamental principles.

1. Introduction

1.1 The School seeks to create an environment of courtesy, teamwork, diligence and self-regulation, with helpful examples set by staff and older pupils. It promotes socially responsible behaviour, respect for others and mutual tolerance, whilst celebrating success.

1.2 This policy has been developed with the guidance laid out in *Preventing and Tackling Bullying* (DfE, July 2017)[1]. This policy should be read in conjunction with the following policies:

- Safeguarding and Child Protection Policy
- Safeguarding Code of Conduct for Staff (see the annex of the Safeguarding and Child Protection Policy)
- School Standards (Rules and Regulations)

[1] See: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/444862/Preventing_and_tackling_bullying_advice.pdf

- Behaviour Policy
- Acceptable Use Policy for Pupils
- Digital Safety Policy
- Anti-Bullying Handbook

1.3 This policy has regard to Part 3 (Welfare, health and safety of pupils), Paragraph 10 (Bullying) of the Independent School Standards Regulations.

2. Why do we need an Anti-Bullying Policy?

2.1 Persistent bullying can severely inhibit a child's ability to learn effectively or a member of staff's ability to do their job. The negative effects of bullying can have a serious impact on a person for their entire life and can cause psychological harm. The School wishes to promote a secure and happy environment free from threat, harassment and any type of bullying behaviour, including racist and homophobic bullying. Therefore, this policy promotes practices within the School to reinforce our vision, and to remove or discourage practices that negate them.

2.2 **Aims of the Anti-Bullying Policy**

The School aims:

- to create an atmosphere in which all pupils feel secure and valued
- to increase awareness and to encourage pupils to report concerns regarding bullying
- to provide protection, support and reassurance for victims
- to develop the self-confidence and self-esteem of all pupils
- to develop an effective range of emotional 'self-defence' skills for all pupils
- to promote an anti-bullying ethos amongst the whole School community

3. Definition of Bullying

3.1 Bullying is the infliction of attacks, physical, psychological, social or verbal in nature, that are repeated over time and with the intention of causing distress to others. Bullying could also be a single incident over which action needs to be taken. Bullying may be motivated by prejudice against particular individuals or groups, for example because of some perceived physical, economic, sexual, intellectual, domestic, cultural, religious or racial difference or because a child is adopted or is a carer. It can be particularly distressing to draw attention to a person's physical appearance and / or disability (including those with special educational needs and disabilities). Bullying on the basis of protected characteristics is taken particularly seriously and such incidents are recorded appropriately. Bullying may occur directly or through cyber-technology (e.g. social websites, mobile phones, text messages, photographs, email, portable electronic devices, apps, etc.). Bullies and their victims may be of any age, size or physical strength. When bullying takes place, those who know of it, besides the bully and their victim, will probably include other pupils and possibly some parents.

3.2 Bullying and cyber-bullying may include:

- Physical assault

- Derogatory name calling of an insulting and / or personal nature
- Verbal abuse and threats
- Abusive or threatening emails, texts, instant messages or calls on mobile phones
- Hijacking or cloning email or social networking accounts, or using email or social networking to impersonate a person
- The use of mobile phone camera images to cause distress, fear or humiliation
- Demanding money, material goods or favours by means of threat or force
- Ridiculing an individual because of physical, economic, sexual, intellectual, cultural or racial difference or religious belief
- Graffiti designed to intimidate or embarrass
- Posting threatening, abusive, offensive or humiliating material or comments on websites (including blogs, personal websites and social networking sites such as Facebook, Instagram, Twitter, Snapchat or YouTube)
- Incitement of others to commit acts of bullying
- Racist, sexist, misogynistic, homophobic, biphobic or transphobic behaviour
- Deliberate exclusion or isolation of an individual or a group

3.3 The School's Behaviour Policy promotes an explicitly anti-discriminatory position. Specifically, the School holds positions that are anti-racist, anti-sexist and, explicitly, anti-HBT. The School seeks through its policies and lived experienced to provide an environment which is inclusive for any and all minority groups.

The School has adopted the definition of racism, as defined in the MacPherson report[2]: *'Conduct or words which advantage or disadvantage people because of their colour, culture or ethnic origin. In its subtle form it is as damaging as its more overt form.'*

3.4 **Pupils who engage in bullying**

Pupils have to learn that bullying is unacceptable. Those who engage in bullying and fail to show through their actions that they have learnt that bullying is unacceptable risk forfeiting their right to be at the School and can face permanent exclusion.

Pupils will be given opportunities to:

- Face up to the harm they have done
- Learn to behave in ways which will not cause harm in future
- Develop their understanding of how others think and feel
- Learn how to take steps to repair the harm they have caused
- Pay a penalty for the harm they have done and thus be held accountable for their actions

Pupils who are guilty of bullying will be given sanctions according to the severity of the offence: see the Behaviour Policy for an explanation of the different kinds of sanctions, which can include warnings.

3.5 **Parents and bullying**

All parents of pupils at the School will be expected to recognise and eschew any behaviour towards staff, or any other members of the School community, that is bullying.

[2] See The Macpherson Report, 1999: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/277111/4262.pdf

In addition, the School expects that parents will reinforce and espouse the School's aims and ethos and insist upon the value of good behaviour, and a rejection of bullying, to their children. Parents are encouraged to report instances of bullying to the School that they may witness as bystanders.

Staff will inform the Head if they are subject to behaviour from parents that they regard as unacceptable and that may constitute a form of bullying. The matter will be investigated by the Senior Deputy Head, or another senior member of staff nominated by the Head. The Senior Deputy Head will meet with the parent(s), member of staff and, if appropriate, the pupil to decide if:

- parents have engaged in bullying behaviour
- parents have acted unreasonably
- the behaviour of parents has adversely affected, or is likely to affect, the progress of their child or another pupil at School
- the behaviour of parents has impacted on the well-being of a member of staff
- the behaviour of parents has brought or is / was likely to bring the School into disrepute

At the conclusion of the investigation the Senior Deputy Head will communicate the findings to the parents and may propose a formal meeting with the Head to decide on an appropriate way forward.

In more serious cases, where the relationship between the School and home has irretrievably broken down, the Head may require the pupil to be removed from the School on a permanent basis (as per the Terms and Conditions of the parental contract). In common with the procedure for the permanent exclusion of a pupil for disciplinary matters, a requirement to remove a pupil from the School would be subject to a review if requested by parents, in line with the School's Procedure for the review of a pupil's required removal.

3.5 **Staff who engage in bullying**

It is expected that all staff employed by the School will recognise and eschew any behaviour which is bullying. Conduct that constitutes the bullying of pupils, colleagues or any other members of the School community will be treated as a disciplinary offence, in accordance with the School's policies and procedures.

4. Preventative Measures

4.1 Firstly, the School acknowledges that bullying happens in all schools, including this school. It is distressing to the victims and represents a problem that has to be addressed seriously.

1. It will be made clear to all pupils that bullying is not acceptable. Pupils are encouraged to report any incidents to their Form Tutor or any member of staff and these are investigated promptly. **Such reports are recorded by school staff.** The School aims to create a climate of trust in which reporting to an adult is the normal response to bullying rather than passive acceptance or violent reaction. Pupils with learning difficulties may be particularly at risk of bullying and, therefore, staff should be particularly aware of potential problems with these pupils.

2. Part of the PSHEE programme involves anti-bullying education in which the following points will be stressed:
    a. What bullying is and how to recognise it
    b. Why it is done and what makes a bully
    c. Who does it: the stereotypes of bullies, understanding the bully
    d. What to do if you are a victim: inform staff, how to avoid it, coping strategies

3. The question of bullying and cyber-bullying is also dealt with in assemblies (for example in National Anti-bullying week), Tutor periods, Drama, and PSHEE.

4. Professional training is available to promote staff understanding of the problems of bullying and cyber-bullying, including the specific needs pupils with protected characteristics, for example pupils from minority ethnic backgrounds and LGBTQ+ pupils, and taking action to reduce the risk of bullying at times and in places where it is most likely. Training courses are made available to all Staff. The issue is also discussed at meetings of Heads of Year and Heads of Section.

5. Incidents of bullying are recorded and stored securely by the Deputy Head Pastoral in order to track patterns of behaviour and to monitor types of bullying so that the School can address specific incidents in a timely manner and ensure that any patterns are identified swiftly and managed decisively. Incidents of homophobic, Biphobic and Transphobic Bullying (HBT) are logged and reviewed. Incidents of racist bullying which includes anti-Semitism and Islamophobia, are logged and reviewed.

6. Patterns of bullying including HBT and racist bully are reported to the Board of Governors on a termly basis.

7. Tutors, duty staff and prefects involved in the supervision of pupils are all briefed to watch out for signs of bullying. Prefects affiliated to Forms in the Lower School are instructed to respond quickly to any sign of bullying and given guidance on how to do so.

8. Parents and pupils are given guidance about the part they can play to prevent bullying and cyber-bullying, including when they find themselves as bystanders. Information is provided which enables the School's Policy and legal responsibilities to be understood and further resources of support are made available Opportunities for this to occur include Familiarisation and Induction events for new pupils, Parents' talks, and during Assemblies, Tutor time and PSHEE.

9. The Pastoral Team run workshops with pupils and parents regarding on-line and digital safety to provide information about the on-line world to build resilience in the pupils to protect themselves and their peers.

5. Procedures: Follow up to Incidents

5.1 As stated in the aims above, the School aims to create an atmosphere in which all pupils feel secure and valued. When bullying arises, bullies are confronted with their behaviour in

a way that enables them to see the inappropriateness of their actions and the hurtful consequences that ensue. The bullied are supported and, subsequently, monitored. Appropriate sanctions are imposed on those who bully; pupils are informed that it is one of the few issues on which the School is prepared to permanently exclude pupils.

1. A bullying or cyber-bullying incident will be treated as a child protection concern when there is reasonable cause to believe that a child (the victim, the bully, or both) is suffering or is likely to suffer from significant harm.

2. Allegations of bullying or violence will be investigated, and any actions that may be taken or recommended to the Head will be determined, in line with the procedures outlined in the School's Behaviour Policy.

3. Sanctions may be applied to pupils in line with the School's Behaviour Policy. Sanctions imposed will match the severity of the offence. Where pupils are given a Saturday Detention or some period of temporary or permanent exclusion, these details will be recorded.

4. Parents will be alerted where, in the professional judgement of those staff responsible for the implementation of pastoral policy, the incident is sufficiently serious to warrant such action.

5. The Deputy Head Pastoral and the relevant Head of Section and Head of Year will keep a record of bullying incidents. This is, in part at least, so that patterns of "who, when and where" can be identified.

6. In cases where a group or Form are found to be bullying a pupil, not only may punishments be imposed but tactful efforts will be made to identify underlying causes to enable those involved to move towards a better quality of School life.

7. In certain cases, recourse may be had to the services of an appropriate professional to help the victim or the bully. This may include referral to one of the School Counsellors.

6. Social Media sites, Internet risks and Cyber-bullying

6.1 The advent of Social Media platforms such as Facebook, Instagram, Twitter, Snapchat, WhatsApp, Discord and TikTok, has made the internet more interactive, creative and attractive, yet there are a host of associated risks which present problems for pupils, parents and teachers alike.

6.2 Most pupils at the School have smartphones with internet access as well as a digital camera and filming capability. Teenagers possessing such equipment now have on-the-go access to very empowering but also endangering worlds.

6.3 **Potential Benefits**

Provided that the website content is age-appropriate and interactions are non-harmful, users of such websites derive a sense of *inclusion* and a social freedom which perhaps feel different to the hierarchies and power-dynamics of groups formed at School. Another

benefit is that they develop skills of discernment and managing risk when using such sites. It is inevitable that all internet-users need, at some stage, to discern what is safe and what is not, what is genuine and what may be fraudulent; teenagers need to know what to ignore, what to delete, and also, if a victim of cyberbullying, what to *save as evidence.* Such skills of discernment and saying 'no', are a crucial part of growing up to become a responsible, socially-empowered citizen in today's world.

6.4 **Potential Dangers**

In School, internet interactivity is supervised, filtered and monitored. The School uses Sophos web-filtering to filter and monitor agreed inappropriate content and to alert the School to safeguarding issues in email. The School uses Lightspeed for webpage filtering and monitoring and Senso.Cloud for classroom monitoring which includes comprehensive safeguarding. The Director of Digital Strategy and Deputy Head (Pastoral) have access to all platforms and these are monitored regularly, including during the holidays.

Out of School, there is often no supervision, filtering or monitoring with the exception of School-issued pupil devices. Pupils with broadband connections on their computers at home or with mobile phones and other portable devices enabled with 3G, 4G, 5G or Wi-Fi are vulnerable to:

- receiving harmful content, including unsolicited bulk email (SPAM), pornographic material, and non-age-appropriate advertising
- becoming complicit 'bystanders' to such content if they pass it on or watch it and post comments (e.g. as is common on YouTube)
- sexual predation
- in-app buying
- cyber-bullying (sending nasty or threatening text messages, photos, movie clips about someone, or posting such material on websites)

6.5 **What should parents do?**

First, internet-accessible computers should be placed in an open living area. This naturally reduces the temptation to view / deal in inappropriate or harmful content. Secondly, visit www.thinkuknow.co.uk and read the advice about technical filters. It is possible to have filters on smartphones and mobile devices to protect your child.

As a School, we ask that you read our policy on Cyberbullying (contained within this policy), the Digital Safety Policy and the Acceptable Use Policy for Pupils so that you and your child fully understand what we deem to be the use and misuse of technology.

As a general rule regarding use of computers, internet, social networking sites and all digital technology, all pupils should:

- Respect other people's privacy
- Never do online what they would not do face-to-face
- Consider how other people would feel and not communicate anything which would cause alarm or distress deliberately or 'by mistake'

6.6 **Cyberbullying**

All bullying can be disturbing, but cyberbullying is particularly damaging. Not only is there often the threat of anonymity, but the bullying does not stop at 'the school gate' as it might have done in the past. Cyberbullying on the internet endures and is repetitive by virtue of the fact that any further viewing and commentary (in a *global* audience) will proliferate the abuse. Also, owing to its remoteness, the perpetrator will not necessarily see the

subsequent, ongoing effect on the victim and may deem the comment as 'just a bit of fun'. (Also see also the definition of bullying above.)

Cyberbullying can include threats and intimidation, defamation, harassment, exclusion or peer rejection, impersonation and unauthorised publication of private information or images. It can also include messages intended as jokes, but which have an upsetting or harmful outcome.

Any case of cyberbullying should be reported to the School, which will use its discretion to determine whether or not to report the case to the police. The same Procedures: follow up to Incidents will be followed as for bullying (as outlined above).

6.7 **Preventative measures**

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

- Expects all pupils to adhere to its Digital Safety Policy and Acceptable Use Policy for Pupils.
- Blocks certain sites by our filtering system, and our IT Services staff monitor pupils' use.
- Offers guidance on the safe use of social networking sites and cyberbullying in PSHEE lessons, which covers blocking, removing contacts from "friend" lists and sharing personal data.
- Offers guidance on keeping names, addresses, passwords, mobile phone numbers and other personal details safe.
- Restricts the pupils' use of mobile phones, as described in the School Standards (Rules and Regulations).
- Does not allow the use of cameras or mobile phones in toilets, washing and changing areas.

Appendix 1: Statement on bullying for display

City of London School

City of London School Anti-Bullying Policy

Any member of the City of London School Community, pupil, employee or volunteer, has the right to learn and work without fear of being bullied.

Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullies and their victims may be of any age, size or physical strength.

Bullying can take many forms and includes such things as: name calling, taunting, mocking, making offensive or humiliating comments, gossiping, spreading hurtful or untruthful rumours, laughing or sniggering at someone in an unkind way, taking or deliberately damaging a person's belongings, threats and extortion, physical violence and intimidation, using body language inappropriately (e.g. giving 'dirty' looks or 'eye-rolling'), deliberately invading someone's personal space, producing offensive graffiti or writing unkind notes about someone, and cyberbullying.

Cyberbullying ... includes any of the above perpetrated via electronic or mobile devices, or when using social media. This also includes sending or displaying offensive or degrading images by phone or via email / the internet, and isolating or excluding people either socially or online.

Main points:

- When bullying has taken place, those who know of it, besides the bully and the pupil, will probably include other pupils and, possibly, parents.
- It is vital that all who know of bullying should report it to a Tutor or any other member of staff who will, if they think fit, pass the information on to Heads of Year or, in serious cases, to the Head.
- The reporting of bullying, even anonymously, is by no means to be regarded as 'snitching: it is absolutely and always the right thing to do. Indeed, it is a duty for every member of the School.
- Bullying is unacceptable and will not be tolerated at the School. This means that a bully can expect, as appropriate, advice, reprimand or punishment. Serious or persistent offence may incur suspension or permanent exclusion.
- A concern for others lies at the heart of the School. Each and every one of us can help to create an atmosphere of friendly co-operation, respect and tolerance by refraining from bullying behaviours and by speaking out if we see it happening.