



## **Telford Court**

### **Anti-Bullying Policy and Procedure**

**2026-2027**

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## **1. Policy Statement**

The Greenhouse is committed to providing a caring, friendly and safe environment for all of its learners and staff, ensuring they are treated with dignity and respect so they can learn and work in a relaxed and secure atmosphere. Bullying of any kind is unacceptable and will not be tolerated. Where bullying does occur, all incidents will be dealt with promptly and effectively.

The Greenhouse is committed to an inclusive, anti-discriminatory culture in which racism, inequality and bias are actively challenged by all staff. We recognise that a child's experience of bullying must always be understood in the context of their identity, background and any intersecting vulnerabilities they may face.

This policy has been written in accordance with Keeping Children Safe in Education (KCSIE) 2026 and Working Together to Safeguard Children (WT) 2026, with particular focus on child-on-child bullying, clear reporting routes for students, robust incident tracking and effective communication with parents, carers, commissioning schools and the Local Authority.

This policy ensures that:

- Bullying is not tolerated in any form
- Discriminatory behaviour, including racism and misogyny, is actively challenged
- Students and staff know how to report concerns
- All incidents are recorded, tracked, reviewed and analysed for patterns of disproportionality
- Child-on-child bullying is recognised as a safeguarding matter
- Children experiencing multiple or overlapping harms receive a coordinated response
- Appropriate communication takes place with parents, carers, commissioning schools and the Local Authority

## **2. Legal Framework**

This policy complies with and has regard to:

- Keeping Children Safe in Education (KCSIE) 2026
- Working Together to Safeguard Children 2026
- Education and Inspections Act 2006
- Equality Act 2010
- Children Act 1989 and 2004

- Protection from Harassment Act 1997
- DfE Guidance: Preventing and Tackling Bullying (2017)
- Online Safety Act 2023

### 3. Scope

This policy applies to all staff, learners and visitors at The Greenhouse. It covers behaviour on Greenhouse premises, during off-site activities and, where relevant, online behaviour that has an impact on the school community.

The following may be affected by this policy:

- All staff (including volunteers, contractors and agency workers)
- Learners placed at The Greenhouse by a commissioning school or Local Authority
- Parents and carers
- Commissioning schools and Local Authorities
- Employers and Awarding Organisations

### 4. Roles and Responsibilities

| Role                                      | Responsibility   |
|---|--|
| <b>Headteacher</b>                        | Overall responsibility for this policy; ensuring it is implemented, communicated, monitored for disproportionality and reviewed annually.  |
| <b>Designated Safeguarding Lead (DSL)</b> | Oversight of all child-on-child bullying concerns; liaison with external agencies and the Local Authority; ensuring safeguarding referrals are made where required under KCSIE 2026 and WT 2026. |
| <b>All Staff</b>                          | Maintain vigilance; actively challenge discriminatory and misogynistic behaviour; respond to and record all concerns promptly; model respectful, inclusive behaviour.                            |

|                         |   |
|-------------------------|---|
| <b>Students</b>         | Treat one another with respect and report concerns to a trusted adult or via available reporting routes.              |
| <b>Parents / Carers</b> | Support the school's approach, encourage students to report concerns and engage with the school when incidents arise. |

## 5. What is Bullying?

Bullying is behaviour that is repeated, intended to hurt someone physically or emotionally, and often directed at certain groups. It can take place in person or online and may be targeted at a person because of their race, religion, gender, sexual orientation, special educational needs or disabilities, or because a child is adopted, looked after or has other protected characteristics.

Bullying can include:

- Physical – hitting, kicking, pushing, the use or threat of weapons, or theft of belongings
- Verbal – name-calling, threats, offensive comments or mocking
- Emotional / psychological – excluding, humiliating, spreading rumours or coercive behaviour
- Cyberbullying – using phones, social media, gaming platforms, online forums or AI-generated content (including deepfakes) to harass, threaten or humiliate
- Prejudice-based – bullying linked to a protected characteristic such as race, religion, disability, gender identity or sexual orientation
- Misogynistic – behaviour or language that demeans, threatens or discriminates against someone because of their gender, including where this intersects with harmful sexual behaviour
- Financial exploitation – using bullying to coerce someone into handing over money, property or to participate in fraud or scams

In line with KCSIE 2026, The Greenhouse recognises that violence between children can be a safeguarding concern for both the victim and the perpetrator, particularly where physical assault or threats with weapons are involved. Single incidents of unkindness or conflict will also be taken seriously and addressed, even where the threshold for sustained bullying has not been met.

## **6. Child-on-Child Bullying**

In line with KCSIE 2026, The Greenhouse recognises that children can, and do, cause harm to other children. This is referred to as child-on-child abuse and can include bullying (including cyberbullying), physical abuse, sexual harassment, sexual violence, misogynistic behaviour and other harmful behaviours.

The Greenhouse will never dismiss or minimise child-on-child bullying. All staff understand that this behaviour is never acceptable and that students are often less likely to report it. The Greenhouse is therefore committed to maintaining a culture in which students feel safe to raise concerns.

In line with Working Together to Safeguard Children 2026, The Greenhouse recognises that children may be experiencing multiple or overlapping harms simultaneously. Where bullying occurs alongside other concerns – such as exploitation, domestic abuse in the home, or other forms of abuse – staff will consider the full context of a child’s life and ensure a coordinated response that addresses all identified risks.

Child-on-child bullying will be treated as a safeguarding concern where appropriate. Staff who become aware of such behaviour must report it to the Designated Safeguarding Lead (DSL) as soon as possible, in addition to following the procedures set out in this policy.

### **Signs That a Student May Be Being Bullied**

Staff should be alert to changes in a student’s behaviour or wellbeing that may indicate bullying is occurring. These may include:

- Unexplained changes in mood, withdrawal or distress
- Reluctance to attend, or an increase in unexplained absences or requests for reduced timetable
- Physical marks or damaged / missing belongings
- Changes in social behaviour or avoidance of certain students or situations
- Reduced confidence, low self-esteem or anxious presentation
- Signs of mental health difficulties including self-harm, low mood or disordered eating

In line with KCSIE 2026, where bullying is identified as contributing to or intersecting with a student’s mental health difficulties, staff will ensure early identification of risk and prompt referral to appropriate support. Staff should also be aware that students on part-time or flexible timetables, or who have been repeatedly removed from sessions, may be particularly vulnerable and should be considered for Early Help.

Where staff observe any such signs, they should follow the reporting procedure set out in this policy and speak to the DSL where a safeguarding concern may exist.

## 7. How Students Can Report Concerns

The Greenhouse is committed to maintaining an open culture in which all students feel confident reporting bullying or concerns about the behaviour of others. Students may report concerns in the following ways:

- Speaking directly to any member of staff they trust
- Speaking to the Head of Centre
- Speaking to the Designated Safeguarding Lead
- Asking a parent, carer or other trusted adult to contact the school on their behalf

Staff who receive a report from a student will take it seriously, record it promptly and ensure the student is supported throughout the process. No student will be discouraged from reporting a concern, and students will not be penalised for raising concerns in good faith.

In line with KCSIE 2026, where a student discloses harm, staff will take immediate appropriate action, which may include first aid, removal from harm, or an immediate referral to the DSL. Staff will not promise confidentiality but will handle disclosures sensitively and with due regard for the student's safety and dignity.

## 8. Recording and Tracking Incidents

All incidents of bullying – including where bullying is suspected but not yet confirmed – must be recorded promptly. The Greenhouse uses its existing concern recording forms for this purpose. A separate bullying incident log is not required: the Safeguarding Concern Record Form and Significant Concern Record Form together provide the full recording framework for all bullying-related incidents.

Staff should select the appropriate form based on the nature and severity of the incident:

**Safeguarding Concern Record Form** – use where bullying meets the safeguarding threshold (e.g. child-on-child abuse, physical assault, sexual harassment, sustained emotional abuse, or any incident requiring DSL referral). Tick 'Bullying' in the Nature of Safeguarding Concern section.

**Significant Concern Record Form** – use where bullying does not meet the safeguarding threshold, including low-level or suspected incidents, single incidents of unkindness, discriminatory language, or cyberbullying that does not rise to abuse. Tick 'Bullying' in the Nature of Concern section.

Where there is any doubt about which form to use, staff should consult the DSL. An incident that begins as a Significant Concern may be escalated to a Safeguarding Concern Record Form if the situation develops.

### **What must be recorded**

Whichever form is used, the record must capture:

- Date and time of the reported incident
- Names of those involved (reporter, alleged target and alleged perpetrator)
- A description of the incident or concern
- Names of any witnesses
- Immediate action taken
- Outcome and follow-up actions
- Whether parents and / or carers were informed
- Whether a mental health concern was identified and whether an Early Help referral was made
- Whether the incident was referred to the DSL or external agencies
- Whether the incident involved a protected characteristic or potential disproportionality

### **Pattern monitoring**

The Headteacher will regularly review bullying-flagged records across both forms to identify patterns of disproportionality – for example, whether students with particular protected characteristics are over-represented in incidents. This analysis will inform the school's safeguarding and pastoral practice and will feature in annual safeguarding reporting to the Business Director.

All records will be retained in accordance with the school's data protection and record-keeping requirements and will be available to inspectors and the Local Authority on request.

## **9. Procedure**

### **Informal Process**

Where a student or member of staff experiences low-level bullying behaviour, it may initially be possible to address the matter informally with the support of a member of staff. The person engaging in the behaviour will be spoken to and made aware of the impact of their actions. A record of any such conversation will be added to the

Significant Concern Record Form (with Bullying ticked in the Nature of Concern section).

The Greenhouse recognises that some individuals may be unaware of the impact of their behaviour. Where this appears to be the case, restorative approaches may be used to support resolution. However, where the behaviour is discriminatory, misogynistic or constitutes a safeguarding concern, it will be escalated immediately regardless of intent.

### **Formal Process**

Where informal resolution is not appropriate or has not resolved the matter, or where the behaviour is serious, the affected student or member of staff should raise a formal complaint in writing to the Head of Centre. Where the complaint concerns the Head of Centre, it should be submitted to the Headteacher.

The written complaint should include:

- The name of the person whose behaviour is of concern
- The nature of the behaviour
- The date(s) and time(s) at which it occurred
- The names of any witnesses
- Any action already taken

Following receipt of a formal complaint, the Head of Centre or another person with appropriate experience and no prior involvement will undertake an impartial investigation. The Greenhouse will usually meet with the affected student or member of staff within one week of receiving the complaint. Students may be supported by a parent, carer or trusted adult.

The Greenhouse will take all reasonable steps to manage the relationship between those involved during the investigation. Information will be disclosed only on a need-to-know basis and the utmost confidentiality will be maintained, consistent with the school's obligations under KCSIE 2026 and WT 2026.

Where the investigation confirms that bullying has occurred, the Greenhouse will take proportionate action. Where the perpetrator is a member of staff, this will be addressed under the Discipline Policy and Procedure. Where the perpetrator is a student, action may include restorative work, additional support or, in serious cases, referral to external agencies. The Greenhouse recognises that a student whose behaviour has caused harm may themselves be a victim of abuse or exploitation, and their needs will be assessed accordingly.

Whether or not a complaint is upheld, the Greenhouse will consider how best to support all parties and manage any ongoing relationships.

## **Appeals**

If an affected student or member of staff is not satisfied with the outcome of the investigation, they may appeal in writing to the Head of Centre or Headteacher within seven days of receiving the outcome. The appeal letter must state the full reasons for the appeal.

An appeal meeting will normally be arranged within seven days of receiving the appeal and will be conducted by a person not previously involved in the investigation. The Greenhouse will notify the appellant of its decision in writing, usually within seven days. There will be no further right of appeal after this decision.

## **10. Communication with Parents, Carers, Schools and the Local Authority**

### **Parents and Carers**

The Greenhouse will inform parents and carers promptly where their child is involved in a bullying incident, whether as a target or as someone whose behaviour has raised concern. Parents and carers will be kept informed of the investigation process and its outcome in a timely and sensitive manner. Where a student is Looked After, the Designated CLA Teacher will ensure relevant information is shared with the Virtual School Head.

### **Commissioning Schools**

Where a student is placed at The Greenhouse by a commissioning school, that school will be notified of any bullying incident involving their student in a timely manner, in line with agreed information-sharing protocols. This enables commissioning schools to maintain an accurate and current picture of a student's welfare and behaviour.

### **Local Authority**

In line with Working Together to Safeguard Children 2026, The Greenhouse will share relevant information with the Local Authority where:

- A bullying incident constitutes or escalates to a safeguarding concern
- A child who is Looked After is involved
- The Local Authority requests information as part of its oversight responsibilities
- Persistent or serious bullying requires multi-agency involvement or a Family Help response
- Analysis of incident data identifies disproportionality that requires a broader safeguarding partnership response

All sharing of information with external parties will be timely, proportionate and in line with the school's Data Protection Policy and the information-sharing principles set out in KCSIE 2026 and WT 2026.

### **Referrals to External Agencies**

Where child-on-child bullying reaches the threshold of a safeguarding concern, the DSL will follow the school's Safeguarding and Child Protection Policy and make appropriate referrals. This may include referral to Children's Social Care, the Early Help service, or, where a criminal offence may have been committed, to the police.

## **11. Prevention and Culture**

The Greenhouse is committed to a proactive, inclusive approach to preventing bullying. This includes:

- Embedding a culture of respect, inclusion and positive relationships across the provision
- Actively challenging racism, misogyny, discrimination and inequality in all its forms, in line with WT 2026
- Ensuring students understand what bullying is, why it is harmful and how to report it
- Ensuring students are aware of online risks, including AI-generated content, deepfakes and financially motivated exploitation
- Providing staff with training to recognise, respond to and record bullying, including child-on-child abuse and discriminatory behaviour
- Addressing bullying themes within PSHE and wider pastoral support
- Using restorative approaches to repair relationships and address the root causes of behaviour
- Monitoring trends in bullying-flagged records across both concern forms, including analysis for disproportionality, to identify and address emerging concerns

## **12. Support for Those Involved**

The Greenhouse recognises that bullying can have a significant impact on a young person's mental health, self-esteem and engagement in education. In line with KCSIE 2026, where bullying is identified as a contributing factor to mental health difficulties including self-harm, low mood or disordered eating, early referral to appropriate

support will be made. Support will be offered to all students involved in a bullying incident, including:

- Pastoral support from a trusted member of staff
- Referral to the school's Transition and Intervention Practitioner where appropriate
- Early Help referral where the student meets the relevant threshold, including where they are on a part-time timetable or have been repeatedly withdrawn from sessions
- Referral to external counselling or mental health support services where needed
- Regular follow-up to ensure the situation has been resolved and the student feels safe

Support will also be considered for students whose behaviour has caused harm, recognising that such behaviour may itself be indicative of unmet needs, abuse, exploitation or other overlapping harms.

### **13. Monitoring and Review**

This policy will be reviewed annually by the Headteacher and approved by the Business Director. In line with Working Together to Safeguard Children 2026, the annual review will include analysis of bullying-flagged records from the Safeguarding Concern Record Form and Significant Concern Record Form to assess the impact of the policy on children's safety and wellbeing, including any patterns of disproportionality. Findings will be reported to the Business Director as part of the school's annual safeguarding report.

The policy may also be updated in response to:

- Changes in legislation or statutory guidance, including updates to KCSIE and WT
- Changes in school practice
- Identified patterns in incident data

### **14. Related Policies**

This policy must be read in conjunction with the following related policies:

- Safeguarding and Child Protection Policy
- Behaviour Policy
- Online Safety Policy
- Attendance Policy
- UK GDPR Policy and Procedure

**This policy has been written by Fiona Conde (Headteacher) and approved by  
Jonathon Simpson (Business Director).**

*Jonathon Simpson*

**Approval Date: June 2026**

**Review Date: June 2027**