

Anti-Bullying Policy

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Equality and Inclusion Statement

Apex Specialist Education and all learning centres are committed to equality, inclusion, belonging and respect. This statement applies to every school policy and guides our work across all learning centres.

We promote equality of opportunity, value diversity and work to eliminate discrimination, harassment and victimisation. In accordance with the Equality Act 2010 and the Special Educational Needs and Disability Code of Practice, we provide an inclusive education that enables all pupils to participate fully, overcome barriers, develop their potential and achieve positive outcomes.

We recognise diversity as a strength to be respected, celebrated and reflected throughout school life. We strive to ensure everyone feels safe, valued, represented and that they belong. This commitment informs our governance, leadership, safeguarding, curriculum, provision and practice.

Our Commitment:

We are committed to:

- Eliminating discrimination, harassment, victimisation and other conduct prohibited by the Equality Act 2010.
- Advancing equality of opportunity between people who share a protected characteristic and those who do not.
- Fostering good relations between people who share a protected characteristic and those who do not.

Putting our Commitment into Practice:

The Proprietor, Governing Board and Leadership Team will:

- Consider equality implications and the impact of decisions, policies and practice on people with protected characteristics.
- Embed equality, accessibility and inclusion in the development and review of curriculum, provision and policies.
- Identify and seek to reduce or remove barriers to participation, learning, attendance, wellbeing and engagement.
- Promote belonging, positive relationships and high aspirations, particularly for pupils experiencing disadvantage or additional barriers.
- Respond to prejudice-based and discriminatory behaviour, including through safeguarding procedures where relevant.
- Monitor the implementation and impact of equality and inclusion across all learning centres.

Our commitment encompasses the protected characteristics identified in the Equality Act 2010: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

All members of our school community share responsibility for upholding equality, inclusion, belonging and respect in their conduct, relationships and implementation of school policies.

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1. Introduction and the Apex Way

The school aims to prevent bullying, stop harmful behaviour promptly and ensure that pupils feel safe enough to speak about their experiences. Reports will be taken seriously, including where behaviour is described as a joke, banter or a normal part of growing up.

The Apex Way underpins our approach:

- Support: We respect and encourage each other.
- Inspire: We always try our best.
- Flourish: We use positive language and actions.
- Succeed: We follow instructions to achieve together.

These expectations will be taught, modelled and reinforced through positive behaviour support, the curriculum and everyday relationships. Staff and pupil feedback, including the anti-bullying council, will inform prevention and review. The school uses Anti-Bullying Alliance resources to support its practice.

2. Legislation and Guidance

Paragraph 10 of the Independent School Standards requires an effective strategy to prevent bullying, drawn up and implemented by the proprietor. Related standards cover behaviour, safeguarding, welfare, leadership and information for parents. The school will make particulars of its anti-bullying arrangements available to parents and prospective parents as required and will publish this policy on its website as its chosen means of access.

The policy takes account of the Equality Act 2010, Keeping Children Safe in Education 2026, DfE Preventing and tackling bullying, current DfE advice on bullying and harassment of school staff, and UKCIS advice on sharing nudes and semi-nudes. Criminal law may apply to particular conduct, such as assault, threats, harassment or sexual offences; staff will obtain appropriate safeguarding or police advice.

The school uses the current Ofsted Education Inspection Framework and non-association independent school inspection toolkit to evaluate whether prevention, reporting and responses are effective. The school will not assume that powers or procedures specific to maintained schools apply to Healey.

This policy operates alongside the Safeguarding and Child Protection, Behaviour, Suspension, Online Safety, Equality, Diversity and Inclusion, SEND, Staff Code of Conduct and Complaints policies.

3. Responsibilities

The proprietor is accountable for an effective anti-bullying strategy. The Governing Board will monitor implementation, patterns and outcomes and ensure that leaders have sufficient resources and training.

Robert Cochrane, Headteacher, has overall responsibility for implementation, consistent responses and appropriate disciplinary decisions. Heads of Centre will coordinate local

action, assign a staff member to lead each case and check that agreed support and follow-up take place.

Callan Glean is the whole-school DSL and coordinates safeguarding responses. Centre safeguarding leads are Abbie Chadwick-Wood at Altrincham, Joanne Taylor at Stockport and Nadine Sawicki at Rochdale, working within the school's overall safeguarding structure.

All staff will model respectful conduct, challenge harmful behaviour, listen to concerns, record and report promptly, and implement agreed support. Staff must not pass a concern between teams without ensuring that someone has accepted responsibility for action.

Pupils will be taught how to seek help for themselves or others and how to avoid encouraging or sharing harmful behaviour. Parents and carers are encouraged to report concerns and work with the school. Responsibility for protection does not depend on a pupil being able to report or defend themselves.

4. Understanding Bullying

Bullying is repeated behaviour by an individual or group that causes physical or emotional harm where there is an imbalance of power. It may involve deliberate intimidation, humiliation, exclusion or coercion. Power may arise from physical strength, social influence, access to information, communication ability or dependence on others.

Online, a single post or image can result in repeated exposure and sharing. Staff must consider the reach and continuing impact of the behaviour rather than simply counting the number of original actions.

An isolated incident, disagreement or unintended hurt may not meet this definition, but still requires an appropriate response. A single incident may constitute serious abuse, discrimination, harassment or a crime. Staff will not wait for repetition or proof of intent before protecting a pupil.

Some pupils find it difficult to understand the effect of their actions, interpret social situations or communicate distress. Staff will consider these needs without dismissing the impact on others. The response will combine protection, teaching, reasonable adjustments and proportionate action.

5. Forms of Bullying

Bullying may involve physical aggression, threats, name-calling, rumour spreading, humiliation, manipulation of friendships, deliberate social exclusion, damage to belongings, taking money or coercing another pupil to act against their wishes.

Online bullying may include abusive messages, impersonation, hostile group chats, sharing private information, encouraging others to target someone, manipulated images or AI-generated material. It can occur through gaming, social media and messaging services as well as school systems.

The school will challenge bullying associated with actual or perceived:

- race, ethnicity, nationality, religion or belief;
- sex, sexual orientation or gender reassignment, including sexist, homophobic, biphobia and transphobic abuse;
- SEND, disability, communication differences, physical or mental health and appearance;
- care experience, adoption, kinship care, caring responsibilities or family circumstances;
- poverty, pregnancy or maternity, or other personal circumstances; and
- association with another person who is targeted.

Sexual comments, unwanted touching, sexual coercion and sharing intimate images may constitute child-on-child abuse. These concerns require the safeguarding response described in section 10 and must not be treated solely as an ordinary bullying dispute.

6. Recognising Concerns

Possible signs include changes in attendance, reluctance to use transport or particular spaces, distress before or after online activity, damaged belongings, unexplained injuries, withdrawal, anxiety, sleep or eating changes, reduced concentration or a sudden change in behaviour.

These signs are not proof of bullying. Staff will sensitively explore changes, including patterns noticed by families, and remain alert to other safeguarding or health needs. Staff must not assume that distress or injury is simply part of a pupil's SEND.

Communication support may include visual prompts, writing, assistive technology, a trusted adult or an advocate. Staff will allow time for pupils to express themselves and avoid leading questions or requiring repeated accounts unnecessarily.

7. Prevention and Pupil Participation

The school will teach kindness, respect, consent, boundaries, online safety and help-seeking through PSHE, relationships education, assemblies and everyday teaching. Pupils will learn how prejudice and group behaviour can cause harm and how to report concerns safely.

The school will:

- reinforce reporting routes at induction, each autumn term and throughout the year;
- use pupil feedback and the anti-bullying council to identify unsafe places, times and online behaviours;
- supervise lessons, unstructured times, transitions and activities according to need;
- work with transport providers and families where journeys create risks;
- adapt positive behaviour support and communication strategies when patterns emerge;

- use representative teaching materials and challenge stereotypes and derogatory language;
- provide staff induction and refresher training on recognising and responding to bullying; and
- review filtering and monitoring arrangements with safeguarding and technical staff where incidents identify gaps.

Filtering and monitoring support prevention but do not cover every device, platform or offsite interaction. Education, relationships and accessible reporting remain essential.

8. Reporting a Concern

Pupils can tell any trusted member of staff, their form tutor, Head of Centre or a safeguarding lead. They can use speech, writing or their usual communication aids, or ask a parent, carer or advocate to report for them. Families can contact the centre office or Headteacher using the school's published contact details.

Pupils do not have to confront the person causing harm, ask them to stop first or wait for another incident. Witnesses should seek adult help and must not be expected to put themselves at risk by intervening physically.

Staff will respond to anonymous reports as far as the information allows. They will explain that information may need to be shared with people who can help, without promising absolute confidentiality. Any concern about retaliation will form part of the safety plan.

9. Responding to incidents

The first member of staff receiving a report will listen calmly, reassure the pupil that reporting was right, check immediate safety and arrange first aid or urgent help where necessary. Serious or immediate risks will be referred to the DSL and emergency services as appropriate without awaiting an internal investigation.

The staff member will record the report promptly in the school's approved incident-recording system and notify the Head of Centre. Safeguarding concerns must also reach the DSL immediately through the safeguarding reporting route; an entry in a behaviour log alone is insufficient.

The Head of Centre or delegated senior leader will:

- name a case lead and put immediate protective arrangements in place;
- gather relevant accounts separately and sensitively, considering communication needs;
- distinguish the pupil's own words, other evidence and staff conclusions;
- consider patterns, power imbalance, prejudice, online activity and previous concerns;
- consult the DSL about safeguarding thresholds, referrals and any limits on internal enquiries;

- decide support and proportionate action under the Behaviour Policy;
- inform relevant families and staff, subject to safeguarding advice and confidentiality; and
- record an agreed review date and explain how further concerns can be raised.

The pupil alleged to have caused harm will be heard fairly. Safety measures may be necessary while facts are established and do not require a prior disciplinary finding. Staff will not arrange joint questioning or mediation where this risks intimidation or contaminating a safeguarding investigation.

Follow-up will check the experience of the affected pupil, whether behaviour has stopped, attendance and participation, and whether retaliation or further online activity has occurred. A case will not be closed solely because a sanction was issued or a pupil apologised. Persistent or recurring harm will trigger senior review and revised support, supervision or referrals.

10. Safeguarding and Online Incidents

Bullying can be child-on-child abuse and may indicate that a pupil is suffering or at risk of significant harm. The DSL will consider children's social care, police and other professional involvement under the Safeguarding and Child Protection Policy. Any staff member may make a referral directly where necessary; absence of a particular leader must not delay protection.

Reports of sexual violence or sexual harassment will follow KCSIE Part five and the school's safeguarding procedures, including appropriate risk and needs assessment. Staff must not minimise behaviour because pupils are friends, in a relationship, have SEND or describe it as consensual banter.

For ordinary online abuse, staff will preserve relevant information safely, such as dates, usernames and a written account, and seek advice about platform reporting and removal. Pupils should be supported to avoid responding, use reporting or blocking tools where safe, and protect account access.

Suspected sexual images of under-18s, including AI-generated or manipulated images, must be reported to the DSL immediately. Staff must not ask pupils to forward them, copy or save them, or deliberately view them as part of a routine bullying enquiry. The DSL will follow current UKCIS and KCSIE guidance and police advice about evidence, viewing and deletion.

Searching a pupil or device, confiscation and deletion must follow the school's lawful procedures and relevant safeguarding advice. This policy does not create a general power to search or delete material. Staff must not delete evidence of a suspected offence without appropriate advice.

Behaviour outside school will be addressed where it affects safety or education, working with families, other settings and agencies as appropriate. Any disciplinary action must be lawful, reasonable and within the school's published behaviour arrangements.

11. Supporting Pupils and Responding to Behaviour

The pupil who has experienced bullying will be offered a trusted adult, a practical safety plan and support to restore confidence, learning and participation. Staff will check what the pupil finds helpful and avoid changes that unnecessarily isolate or disadvantage them.

The pupil who has caused harm will receive a clear explanation of the behaviour that must stop, teaching and support to change it, and proportionate consequences where appropriate. Staff will consider unmet SEND, mental health or safeguarding needs and whether specialist or multi-agency support is required. Supporting this pupil must not compromise the protection of others.

Actions may include closer supervision, changes to groupings, positive behaviour support, work with parents and proportionate sanctions under the Behaviour Policy. Suspension or ending a placement will follow the school's separate policy and applicable commissioning arrangements. Adjustments must be considered before and during disciplinary decisions.

Restorative work may be offered only where suitable, safe and genuinely voluntary for the affected pupil. An apology, meeting or reconciliation must not be a condition of receiving support. Restorative work does not replace safeguarding referrals or required disciplinary consideration.

The school will also support witnesses and other pupils affected by an incident. Staff will challenge retaliation against anyone who reports a concern or assists an enquiry.

12. Working with Parents and Carers

Parents and carers will be given clear reporting routes and practical information about action to protect their child. The case lead will agree how and when progress updates will be provided and involve families in planning support.

The school will normally contact families promptly. Where contacting a parent may increase risk or prejudice an investigation, the DSL will agree the approach with relevant agencies and record the reasons. Information about other pupils, their histories or individual sanctions will not be disclosed unnecessarily.

Families are asked to report concerns, preserve relevant non-sexual online evidence safely, and avoid confronting other pupils or posting allegations publicly. A pupil will not be disadvantaged because their family has complained.

13. Concerns Involving Adults

An allegation that a staff member or other adult has bullied, harmed or behaved inappropriately towards a pupil must follow the staff-allegation or low-level-concern procedures in the Safeguarding and Child Protection Policy. It must not be resolved solely through the pupil behaviour process.

Concerns about staff should be reported to the Headteacher. Concerns about the Headteacher, senior leaders with a conflict of interest or the proprietor must use the

alternative reporting route in the safeguarding policy, with LADO advice where required. Nobody who is the subject of an allegation should manage their own case.

Bullying or harassment directed at staff by pupils, parents or colleagues will be addressed through the appropriate behaviour, safeguarding, staff grievance or disciplinary arrangements, with support for the affected adult. Leaders will consider the current DfE staff-bullying guidance and seek independent handling where necessary.

14. Records Monitoring and Review

Records will include the report, pupils' accounts, relevant evidence, the type of concern, immediate protection, decisions and reasons, referrals, family contact, support, sanctions and follow-up outcomes. Access will be restricted according to role and records retained under the school's retention arrangements.

The school will use its approved recording arrangements consistently across centres. Leaders will reconcile related behaviour and safeguarding records so that repeated incidents are recognised. Staff induction will identify the current systems and notification routes; using a system never replaces urgent direct reporting.

Leaders will review patterns at least termly, including repeated targeting, prejudice, locations, online incidents and the experience of pupils with additional vulnerabilities. Governors will receive proportionate information about trends, the effectiveness of action and remaining concerns, protecting confidentiality in small cohorts.

Pupil and family feedback will test whether pupils feel safe and trust reporting routes. An absence of reports will not be treated as proof that bullying is absent. This policy will be reviewed annually and sooner if incidents or guidance changes require it.

15. Complaints and sources of support

If concerns remain unresolved, parents and pupils may use the published Complaints Policy. Safeguarding action will continue while a complaint is considered. Immediate danger should be reported to emergency services.

The school can help pupils and families access suitable support, including Childline, the NSPCC, Anti-Bullying Alliance and Childnet. Resources will be selected for the pupil's age, needs and circumstances. Current links are included in the references below.

16. References and Related Policies

Guidance and legal position checked on 1 October 2026. Read the sources according to their stated scope; maintained-school duties are distinguished from the school's own commitments in this policy.

- [DfE Preventing and tackling bullying and advice for parents](#)
- [DfE Preventing and tackling the bullying and harassment of school staff July 2026](#)
- [UKCIS Sharing nudes and semi nudes advice for education settings](#)

- [Anti Bullying Alliance](#)
- [Childline](#)
- [NSPCC](#)
- [Childnet](#)
- [DfE Keeping children safe in education 2026](#)
- [DfE Independent school standards guidance April 2026](#)
- [Ofsted Education inspection framework](#)
- [Ofsted Independent school inspection toolkit and guidance for September 2026](#)
- [Equality Act 2010](#)

Related school policies: Safeguarding and Child Protection; Behaviour; Suspension; Online Safety; Equality, Diversity and Inclusion; SEND; Staff Code of Conduct; staff grievance and disciplinary procedures; Complaints.

Appendix 1 Incident and follow up record

Record the following in CPOMS:

- date and time of report, reporting person and staff member receiving it;
- pupil details, centre, incident dates and locations, including online context;
- the account in the pupil's own words where possible and any communication support used;
- immediate safety, health and safeguarding needs, including risk of retaliation;
- relevant accounts and evidence, distinguishing fact, allegation and interpretation;
- case lead, DSL notification, external referrals and advice received;
- findings, decisions and reasons, including uncertainty and any prejudice identified;
- protective measures, support, adjustments, consequences, responsible staff and deadlines;
- family contact and any justified decision to delay notification;
- review date, pupil feedback and evidence of whether the behaviour has stopped; and
- closure decision or further escalation, with the person responsible and date.