



Anti-bullying and Child on Child abuse Policy

This strategy applies to Steephill School, including the EYFS setting.

Policy owner: Headteacher

Designated Safeguarding Lead: Headteacher

Approved by: Board of Governors

Date of approval: September 2026

Review date: September 2027

Applies to: Preschool, Reception and Years 1–6

1. STATEMENT OF INTENT

SteePhill School is committed to providing a safe, inclusive and supportive environment in which every pupil is able to learn, develop and flourish free from bullying, harassment, discrimination, abuse and intimidation.

We recognise that bullying and child-on-child abuse can have a significant and sometimes lasting impact on a child's emotional wellbeing, mental health, attendance, educational achievement, relationships and sense of safety.

SteePhill School adopts a child-centred and safeguarding-led approach. Every concern will be taken seriously, investigated proportionately and responded to appropriately. Staff will never dismiss behaviour as "banter", "just friendship difficulties", "part of growing up" or "children being children".

SteePhill School recognises that:

- bullying can occur face-to-face, online, inside or outside school;
- bullying may be overt or subtle;
- a single incident may not meet the definition of bullying but may nevertheless constitute abuse, harassment, discrimination or a safeguarding concern;
- children and young people of any age or gender can perpetrate or experience child-on-child abuse;
- pupils with additional vulnerabilities may be disproportionately affected;
- discriminatory and prejudicial behaviour must always be challenged;
- allegations and reports must be considered objectively and without stereotyping;
- the behaviour of an alleged perpetrator does not remove their entitlement to safeguarding and support;
- the school must consider the needs of both the child who has experienced harm and the child alleged to have caused harm.

The prevention of bullying is an integral part of the school's safeguarding, behaviour, pastoral, equality and curriculum provision.

As an independent school, SteePhill School recognises its duty under the Education (Independent School Standards) Regulations 2014 to ensure that bullying is prevented, so far as reasonably practicable, through the development and implementation of an effective anti-bullying strategy.

2. LEGAL AND STATUTORY FRAMEWORK

This policy has regard to, and should be read alongside, the following legislation and statutory/non-statutory guidance, as applicable:

Legislation

- Education Act 1996
- Education Act 2002
- Education and Inspections Act 2006
- Education Act 2011
- Education (Independent School Standards) Regulations 2014
- Children Act 1989
- Children Act 2004
- Children and Social Work Act 2017
- Equality Act 2010
- Human Rights Act 1998
- Protection from Harassment Act 1997
- Malicious Communications Act 1988
- Communications Act 2003
- Public Order Act 1986
- Crime and Disorder Act 1998
- Counter-Terrorism and Security Act 2015
- relevant data protection legislation
- other applicable legislation concerning safeguarding, online safety and information sharing.

Statutory guidance

- Keeping Children Safe in Education 2026 (KCSIE)
- Working Together to Safeguard Children 2026
- Information Sharing: Statutory Guidance for Practitioners and Organisations Providing Safeguarding Services for Children and Young People, current version
- Relationships Education, Relationships and Sex Education (RSE) and Health Education, statutory guidance for introduction from September 2026
- relevant statutory guidance concerning Prevent and safeguarding.

DfE guidance

- Preventing and Tackling Bullying, DfE
- Preventing and Tackling Bullying and Harassment of School Staff, DfE, 2026
- relevant DfE guidance concerning online safety and children sharing self-generated intimate images
- relevant guidance concerning behaviour in schools.

This policy should also be read alongside:

- Safeguarding and Child Protection Policy
- Positive Behaviour Policy
- Relationships and Health Education / RSHE Policy
- Online Safety Policy
- Filtering and Monitoring Policy
- SEND Policy
- Equality, Diversity and Inclusion Policy
- Complaints Policy
- Attendance Policy
- Exclusions / Suspension Policy
- Staff Code of Conduct
- Staff Low-Level Concerns Policy
- Acceptable Use / Mobile Phone Policy.

3. DEFINITION OF BULLYING

Steepphill School uses the DfE understanding of bullying as behaviour that is:

- repeated;
- intended to hurt someone either physically or emotionally;
- often aimed at certain groups because of race, religion, sex, gender, sexual orientation, disability or other protected or personal characteristics; and
- often based on an imbalance of power, whether real or perceived.

However, the school recognises that not every harmful incident will meet the definition of bullying.

A one-off incident of physical violence, sexual harassment, discriminatory abuse, threatening behaviour, hate-related behaviour, online abuse or other harmful behaviour will be responded to according to its nature and may require safeguarding intervention even where it is not classified as bullying.

For the purposes of this policy, bullying may include behaviour which is:

- physical;
- verbal;
- emotional or psychological;
- relational or social;
- discriminatory or prejudicial;
- sexual;
- online/cyber;
- indirect;
- coercive or controlling;
- targeted at a pupil's identity, characteristics, relationships, family circumstances or vulnerabilities.

The impact on the child is an important consideration. A pupil does not have to demonstrate that they have been permanently or seriously affected before the school takes action.

4. CHILD-ON-CHILD ABUSE

KCSIE 2026 requires schools to recognise and respond appropriately to child-on-child abuse, including harassment and violence.

Child-on-child abuse is abuse perpetrated by one or more children or young people against another child or young person.

It can occur between children of the same or different ages and genders and may occur:

- in school;
- outside school;
- online;
- through social media;
- through gaming or messaging platforms;
- through mobile phones or other technology.

Child-on-child abuse may include:

- bullying;
- physical assault;
- threats and intimidation;
- sexual violence;
- sexual harassment;
- harmful sexual behaviour;
- sharing or requesting intimate images;
- self-generated intimate images or videos;
- AI-generated or manipulated intimate images, including deepfakes;
- coercion;
- controlling behaviour;
- initiation or hazing;
- discriminatory abuse;
- racist abuse;
- homophobic, biphobic or transphobic abuse;
- disability-related abuse;
- misogynistic or sexist behaviour;
- domestic abuse within young people's relationships;
- online abuse;
- abuse involving weapons or threats of weapons;
- exploitation.

All staff must understand that children of any age and gender can experience or perpetrate child-on-child abuse.

Child-on-child abuse must never be dismissed as:

- "banter";
- "just a joke";
- "children being children";
- "boys being boys";
- "a friendship issue";
- "mutual behaviour"; or
- an inevitable part of growing up.

Where an incident may constitute child-on-child abuse, staff must inform the DSL in accordance with the school's safeguarding procedures.

5. SEXUAL HARASSMENT AND SEXUAL VIOLENCE

Steeptill school maintains a zero-tolerance approach to sexual harassment and sexual violence.

Sexual harassment includes unwanted conduct of a sexual nature which can occur online or offline and may include:

- sexual comments;
- sexual jokes or taunting;
- physical behaviour such as deliberately brushing against another pupil;
- displaying sexual images;
- sharing sexual images or videos;
- online sexual harassment;
- sexualised name-calling;
- comments about another pupil's body;
- pressuring someone to engage in sexual behaviour;
- making or sharing sexualised images using artificial intelligence.

Sexual harassment will never be dismissed as "banter" or "just a joke".

Where an allegation concerns sexual violence or serious sexual harassment, the DSL will follow the school's safeguarding procedures and KCSIE requirements. The school will consider the immediate safety and wellbeing of all pupils involved and seek advice from external agencies where appropriate.

6. SELF-GENERATED INTIMATE IMAGES AND AI

The school recognises the safeguarding risks associated with self-generated intimate images and videos, including those created, manipulated or distributed using artificial intelligence.

This may include:

- genuine self-generated intimate images;
- manipulated photographs;
- synthetic images;
- deepfakes;

- fabricated sexualised images of pupils;
- threats to share intimate images;
- distribution of intimate images without consent.

Any concern involving such material must be reported to the DSL immediately.

Staff must **not** ask pupils to forward, download or otherwise share intimate images or videos with them.

Steepphill school will follow current DfE safeguarding guidance concerning the handling of self-generated intimate images and will seek specialist advice where required.

7. TYPES OF BULLYING

Bullying can take many forms.

Physical bullying

Including:

- hitting;
- kicking;
- pushing;
- tripping;
- spitting;
- damaging property;
- physical intimidation;
- threatening behaviour.

Verbal bullying

Including:

- insults;
- name-calling;
- threats;
- mocking;
- humiliation;
- repeated derogatory comments.

Relational/social bullying

Including:

- deliberate exclusion;
- isolation;
- manipulation of friendships;
- encouraging others to exclude someone;
- spreading rumours;
- social humiliation.

Cyberbullying

Including bullying through:

- messaging services;
- social media;
- gaming platforms;
- email;
- group chats;
- online forums;
- shared digital content;
- AI-generated content.

Prejudice-based bullying

Including behaviour related to:

- race;
- ethnicity;
- nationality;
- religion or belief;
- disability or SEND;
- sex;
- sexual orientation;
- gender reassignment;
- age, where applicable;
- socioeconomic circumstances;
- appearance;

- family circumstances;
- caring responsibilities;
- language or culture.

SteePhill school recognises that discriminatory incidents can occur even where they do not meet the definition of bullying. Such incidents will nevertheless be recorded, challenged and addressed appropriately.

8. EQUALITY AND INCLUSION

SteePhill School is committed to meeting its obligations under the Equality Act 2010.

The school will:

- eliminate unlawful discrimination, harassment and victimisation;
- advance equality of opportunity;
- foster good relations between different groups;
- challenge prejudice and discriminatory language;
- monitor patterns of bullying and discriminatory incidents;
- consider whether particular groups of pupils are disproportionately affected;
- make reasonable adjustments where required;
- ensure that responses do not themselves discriminate against pupils.

Staff will avoid stereotyping pupils and will consider the individual circumstances of every child.

SteePhill school will maintain an inclusive culture in which difference is respected and celebrated.

9. VULNERABILITY AND BULLYING

The school recognises that some pupils may be more vulnerable to bullying or child-on-child abuse.

This may include, but is not limited to:

- pupils with SEND;
- pupils with medical or additional needs;
- pupils experiencing mental health difficulties;

- pupils who are looked after or previously looked after;
- adopted pupils;
- pupils with caring responsibilities;
- pupils experiencing family difficulties;
- pupils experiencing disadvantage;
- pupils who are new to the school;
- pupils who speak English as an additional language;
- pupils who may be perceived as different from their peers;
- pupils experiencing discrimination or prejudice.

Vulnerability will never be used to stereotype a child or assume that they will experience or perpetrate bullying.

Where a pupil is particularly vulnerable, the DSL and relevant staff will consider whether additional protective measures or pastoral support are required.

10. ROLES AND RESPONSIBILITIES

The Board of Governors

The Board is responsible for ensuring that:

- an effective anti-bullying strategy is in place;
- the policy is implemented effectively;
- the policy complies with relevant statutory requirements;
- bullying and child-on-child abuse are considered within the school's safeguarding arrangements;
- appropriate resources and training are available;
- bullying data and patterns are monitored;
- equality and discriminatory incidents are monitored;
- the effectiveness of the school's arrangements is reviewed;
- the safeguarding link governor maintains appropriate oversight.

Governors will receive appropriate information regarding bullying and safeguarding trends while maintaining pupil confidentiality.

The Headteacher

The Headteacher is responsible for:

- ensuring effective implementation of this policy;
- ensuring concerns are investigated promptly and proportionately;
- ensuring safeguarding concerns are referred to the DSL;
- maintaining appropriate records;
- monitoring patterns and trends;
- ensuring staff receive appropriate training;
- informing parents where appropriate;
- liaising with external agencies where required;
- reporting relevant information to governors.

The DSL

The DSL is responsible for:

- considering whether reports of bullying constitute safeguarding concerns;
- ensuring child-on-child abuse is responded to in accordance with KCSIE 2026;
- making referrals to children's social care, police or other agencies where appropriate;
- ensuring safeguarding records are maintained;
- identifying patterns of abuse or concerning behaviour;
- ensuring appropriate support is offered;
- coordinating multi-agency working;
- ensuring information is shared appropriately and lawfully.

All staff

All staff must:

- remain alert to signs of bullying and abuse;
- take all reports seriously;
- intervene appropriately;
- report concerns promptly;
- record concerns accurately;
- follow safeguarding procedures;
- never dismiss harmful behaviour as "banter";

- challenge discriminatory language and behaviour;
- maintain appropriate confidentiality;
- escalate concerns to the DSL where safeguarding may be involved.

Pupils

Pupils are encouraged to:

- treat others with kindness and respect;
- tell a trusted adult if they experience or witness bullying;
- support peers to seek help;
- avoid retaliating;
- preserve evidence of online bullying where safe to do so.

Parents and carers

Parents and carers are encouraged to:

- report concerns promptly;
- provide relevant information to the school;
- encourage children to speak to trusted adults;
- work constructively with the school;
- avoid encouraging retaliation or confrontation.

11. PREVENTION

Prevention is central to the school's approach.

Steephill school will promote:

- kindness;
- respect;
- inclusion;
- tolerance;
- empathy;
- healthy relationships;
- emotional literacy;
- resilience;

- digital citizenship;
- safe online behaviour;
- respect for difference.

These principles will be reinforced through:

- the curriculum;
- Relationships and Health Education;
- PSHE;
- assemblies;
- pastoral support;
- school values and ethos;
- pupil voice;
- online safety education;
- staff modelling;
- restorative approaches;
- enrichment activities;
- transition arrangements.

Steeplehill school will actively teach pupils how to recognise unsafe, unkind or abusive behaviour and how to seek help.

12. TRANSITION AND NEW PUPILS

The school recognises that pupils may be particularly vulnerable during periods of transition.

For new pupils, the school may:

- meet with parents and the child;
- explain behaviour expectations;
- provide a tour;
- allocate a buddy;
- identify trusted adults;
- monitor social integration;
- make early contact with parents;
- provide additional support where required.

Where a pupil is identified as vulnerable, the DSL may put additional measures in place.

13. SIGNS AND INDICATORS

Staff will remain alert to possible indicators of bullying or child-on-child abuse, including:

- reluctance to attend school;
- changes in attendance;
- withdrawal;
- anxiety;
- loss of confidence;
- changes in behaviour;
- changes in friendships;
- deteriorating academic engagement;
- unexplained injuries;
- damaged or missing possessions;
- changes in eating or sleeping;
- distress following use of devices;
- reluctance to use technology;
- secrecy around online activity;
- increased emotional distress;
- changes in peer relationships.

These indicators are not diagnostic and may have many causes. Staff must consider the wider context and report safeguarding concerns appropriately.

14. REPORTING CONCERNS

Pupils can report concerns to:

- their class teacher;
- any trusted adult;
- the Headteacher;
- the DSL;
- another member of the safeguarding team.

Staff must report concerns in accordance with the school's safeguarding procedures.

Where there is an immediate risk of harm, staff must act immediately and inform the DSL without delay.

A concern should not be delayed while staff attempt to establish whether it technically meets the definition of bullying.

15. INVESTIGATION AND RESPONSE

All reports will be treated seriously.

The response will be proportionate to:

- the nature of the incident;
- the severity of the behaviour;
- the frequency;
- the impact on the pupil;
- the age and developmental stage of the pupils;
- any vulnerability;
- whether there is a safeguarding concern;
- whether discriminatory behaviour is involved;
- whether there is an ongoing risk;
- whether external agencies need to be involved.

Where appropriate, the school will:

1. establish the facts;
2. speak separately with relevant pupils;
3. speak with witnesses;
4. review relevant evidence;
5. assess safeguarding risks;
6. inform the DSL where appropriate;
7. contact parents/carers where appropriate;
8. apply appropriate consequences;
9. provide support;
10. monitor the situation;
11. review whether further action is required.

Staff will avoid premature assumptions and will not assign blame before the relevant facts have been established.

16. SAFEGUARDING ESCALATION

Where bullying involves, or may involve:

- physical assault;
- sexual violence;
- sexual harassment;
- harmful sexual behaviour;
- threats of serious harm;
- coercion;
- exploitation;
- discriminatory abuse;
- self-generated intimate images;
- AI-generated sexualised images;
- significant online abuse;
- serious intimidation;
- criminal behaviour;
- weapons;
- other safeguarding concerns,

the matter must be referred to the DSL.

The DSL will determine whether referral to children's social care, the police or another agency is required.

Steephill school will work in accordance with KCSIE 2026, Working Together to Safeguard Children 2026 and local safeguarding partnership procedures.

17. CYBERBULLYING AND ONLINE ABUSE

Steephill school recognises that online bullying can:

- occur at any time;
- extend beyond school hours;
- involve multiple platforms;
- spread rapidly;
- involve anonymous accounts;
- involve large numbers of pupils;

- leave a permanent digital footprint.

Cyberbullying will be treated as seriously as face-to-face bullying.

Where appropriate, pupils will be encouraged to:

- preserve evidence;
- block or report accounts;
- tell a trusted adult;
- avoid retaliating;
- seek support from the school.

Steephil school will use its filtering and monitoring systems, where relevant, in accordance with its Online Safety and Filtering and Monitoring Policies.

18. ARTIFICIAL INTELLIGENCE

The school recognises that artificial intelligence may be used to facilitate bullying, harassment, discrimination and abuse.

This may include:

- deepfake images;
- manipulated photographs;
- fabricated videos;
- synthetic audio;
- sexualised images;
- impersonation;
- threatening or humiliating content.

AI-generated abuse will be addressed under this policy and, where relevant, the safeguarding and online safety procedures.

19. SANCTIONS AND CONSEQUENCES

Where bullying or harmful behaviour is established, the school will respond in accordance with the Positive Behaviour Policy.

Possible consequences may include:

- restorative work;
- loss of privileges;
- supervised separation;
- parental meetings;
- targeted pastoral support;
- behaviour support plans;
- educational consequences;
- other proportionate sanctions;
- suspension or exclusion in serious or persistent cases.

Steephill school will balance consequences with appropriate support.

Where appropriate, restorative approaches may be used. However, restorative meetings or apologies will never be imposed on a pupil who has experienced harm, and the pupil will never be pressured into meeting the child who caused the harm.

20. SUPPORT FOR PUPILS WHO EXPERIENCE BULLYING

Pupils who experience bullying will be offered appropriate support, which may include:

- reassurance;
- a trusted adult;
- regular check-ins;
- pastoral support;
- friendship support;
- support with online safety;
- reasonable adjustments;
- parental liaison;
- referral to external services where appropriate.

Steephill school will monitor the pupil after the incident and ensure that support does not cease simply because an immediate incident has been resolved.

21. SUPPORT FOR PUPILS WHO HAVE CAUSED HARM

Steephill school recognises that a child who has caused harm may themselves have safeguarding, developmental, emotional or behavioural needs.

Appropriate support may include:

- helping the pupil understand the impact of their behaviour;
- restorative work where appropriate;
- targeted pastoral support;
- behaviour support;
- work with parents;
- assessment of underlying needs;
- referral to appropriate external services.

Supporting a pupil who has caused harm does not diminish the school's responsibility to protect the pupil who has experienced harm.

22. BULLYING OUTSIDE SCHOOL

The school will investigate reports of bullying occurring outside school where the behaviour affects pupils, school safety, relationships or the orderly operation of the school.

This includes bullying:

- on school transport;
- on public transport;
- in the local community;
- online;
- during school trips;
- during extracurricular activities;
- through social media or other digital platforms.

The school will exercise its lawful disciplinary powers appropriately and in accordance with its Behaviour Policy.

Where behaviour may constitute criminal activity or presents a serious risk to pupils or others, the school will consider contacting the police.

23. INFORMATION SHARING AND CONFIDENTIALITY

Information concerning bullying and safeguarding will be handled sensitively and appropriately.

Staff must understand that confidentiality cannot be promised where information indicates that a child may be at risk of harm.

The school will share information where necessary to safeguard children and will comply with current statutory information-sharing requirements and safeguarding guidance.

Information will be shared proportionately and on a need-to-know basis, while recognising that safeguarding concerns should not be delayed because of uncertainty about information sharing.

24. RECORD KEEPING

Steepphill school will maintain appropriate records of bullying and child-on-child abuse.

Records should include, where relevant:

- date;
- pupils involved;
- nature of the concern;
- whether the behaviour was bullying, discriminatory behaviour, child-on-child abuse or another concern;
- safeguarding considerations;
- action taken;
- parents informed;
- agencies involved;
- consequences;
- support provided;
- follow-up;
- outcome.

Significant safeguarding concerns must be recorded on the school's safeguarding recording system (CPOMS) in accordance with the Safeguarding and Child Protection Policy.

Records will be reviewed to identify:

- recurring patterns;

- hotspots;
- vulnerable groups;
- repeat perpetrators;
- repeat victims;
- discriminatory trends;
- online trends;
- weaknesses in prevention;
- wider cultural issues.

25. MONITORING AND EVALUATION

The Headteacher and DSL will regularly review bullying and child-on-child abuse information.

The school will consider:

- frequency;
- type;
- location;
- time;
- pupil characteristics;
- online/offline patterns;
- repeat incidents;
- effectiveness of interventions;
- pupil voice;
- parent feedback.

Findings will inform:

- staff training;
- curriculum provision;
- pastoral provision;
- supervision;
- risk assessment;
- safeguarding arrangements;
- equality work;
- policy development.

The Board of Governors will receive appropriate anonymised information to enable effective oversight.

26. STAFF TRAINING

Staff will receive appropriate safeguarding and behaviour training, including awareness of:

- bullying;
- child-on-child abuse;
- sexual harassment and violence;
- discriminatory behaviour;
- online abuse;
- cyberbullying;
- AI-generated abuse;
- self-generated intimate images;
- safeguarding escalation;
- reporting procedures.

Training will be refreshed as required and when statutory guidance changes.

All staff must read and follow the school's safeguarding procedures and the current KCSIE requirements applicable to their role.

27. PUPIL VOICE

Steephill school will provide age-appropriate opportunities for pupils to express their views about:

- safety;
- relationships;
- friendships;
- bullying;
- online behaviour;
- inclusion;
- discrimination;
- wellbeing.

Pupil voice will be used to identify issues which may not otherwise be visible to adults.

28. PARENT AND CARER ENGAGEMENT

Parents and carers will be informed about the school's expectations and encouraged to work in partnership with the school.

Where a significant incident occurs, the school will communicate with parents/carers as appropriate, taking account of:

- safeguarding;
- confidentiality;
- the welfare of all pupils;
- legal considerations;
- the risk of further harm.

The school will not disclose confidential information about another pupil or family.

29. COMPLAINTS

If a parent or carer believes that the school has not responded appropriately to a concern, they should raise the matter through the school's Complaints Policy.

The complaints process does not replace safeguarding procedures. Safeguarding concerns will always be addressed through the school's safeguarding arrangements.

30. REVIEW

This policy will be reviewed annually and sooner where:

- legislation changes;
- statutory guidance changes;
- safeguarding practice changes;
- incidents indicate that amendments are required;
- monitoring identifies weaknesses;
- the Board of Governors determines that a review is necessary.

The policy will be reviewed alongside the school's Safeguarding and Child Protection Policy, Positive Behaviour Policy, Online Safety Policy, RSHE Policy and Equality Policy.

Next review: September 2027