

		Date	Review Date
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Legal Status

This policy draws on Department for Education guidance 'Preventing and Tackling Bullying' (2017), 'Keeping Children Safe in Education (KCSIE 2026)', and 'Working Together to Safeguard Children (2026)'. It should be read in conjunction with the Behaviour for Success Policy and Safeguarding Policy.

This policy also supports TILT Education's compliance with the Education (Independent School Standards) Regulations 2014, its duties under the Equality Act 2010, and its obligations under the Data Protection Act 2018 and UK GDPR. Records of bullying incidents, including witness statements, are personal data and in some cases special category data, and are handled accordingly.

TILT Education believes that bullying of any kind is unacceptable and will not be tolerated. We are committed to providing a safe, caring, inclusive and respectful environment for all pupils, staff, and members of our community. This policy applies to:

- All staff (teaching and non-teaching) and volunteers working within TILT Education.
- Pupils and parents/carers engaged with TILT Education.

Availability

This policy is made available to staff, parents, and pupils via the TILT Education website. On request, a paper copy or accessible format (large print, translated, or digital version) may be obtained from the TILT Education office.

Monitoring and Review

This policy is subject to continuous monitoring, refinement, and audit by the Proprietors who are both the Head of Centre and Headteacher.

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Introduction:

Schools have a duty of care for pupils and staff alike and, to this end, TILT Education strives to create a safe and happy environment, believing that all bullying is unacceptable, whether at home, at school, at work, in the local community or when social networking. We believe that school should provide a safe, caring and happy place for young people to learn and for adults to work. If this is achieved, TILT Education will be able to develop teaching and learning, whilst fostering an attitude of responsible behaviour at all times to promote safety, both on the premises and out of school hours.

The policy's primary objective is to ensure that members of TILT Education community are clear about their roles and responsibilities, and how to manage a bullying incident if it occurs. However, bullying is not confined to school and this policy aims to make pupils aware of what action they can take both now and in their adult lives, whether as victims of bullying, or as bystanders.

Context:

The Education and Inspections Act 2006, the Equality Act 2010, and successive updates to the Ofsted framework have shaped this policy. It is reviewed annually to reflect current guidance.

The new policy draws on the Department for Education guidance on dealing with bullying, particularly 'Preventing and tackling bullying' (2017). This policy should be read in conjunction with the Behaviour for Success Policy

Roles and Responsibilities:

The Proprietors have overall responsibility for the policy and its implementation. They will ensure bullying cases are appropriately managed, recorded, and analysed to identify patterns.

The Designated Safeguarding Lead (DSL) and deputies will oversee the recording of bullying incidents on LearnTrek and ensure that all incidents are treated as safeguarding concerns where appropriate.

The DSL and Deputy DSL are named in the Safeguarding and Child Protection Policy, which is the definitive record of those roles. Because the DSL is not a Proprietor, reporting from the DSL to the Proprietors provides independent oversight of how bullying is handled.

The Proprietors receive a termly report from the DSL summarising bullying incidents, the actions taken and any emerging patterns, and use it to review the effectiveness of this policy, staff training and staff deployment. All staff receive training on anti-bullying, child-on-child abuse and online safety at induction and at least annually. Training is recorded centrally on the staff CPD log.

Staff will implement the policy consistently and fairly. They will listen to pupils, take concerns seriously, and ensure immediate safety while following TILT Education's procedures. All staff will receive annual training on bullying, peer-on-peer abuse, online safety, and unconscious bias.

Parents and Carers are expected to work in partnership with TILT Education to maintain high standards of behaviour in and out of school and to model respect for others.

Pupils are expected to take responsibility for their own behaviour and to uphold our Anti-Bullying Statement. Pupils will also be supported to contribute to anti-bullying initiatives through forums such as pupil surveys, and peer mentor roles.

Definitions of Bullying:

Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally.

Key features:

- Repetitive and persistent
- Intentionally harmful
- Involves an imbalance of power
- Causes distress, fear, or lack of confidence

**Bullying can be:**

- **Physical** (hitting, kicking, taking belongings)
- **Verbal** (name-calling, threats, racist/homophobic/sexist remarks)
- **Indirect** (spreading rumours, excluding others, manipulating friendships)
- **Cyberbullying** (harmful or threatening messages via social media, group chats, gaming platforms, image-based abuse, deepfakes, or anonymous apps).

Bullying may also be linked to protected characteristics under the Equality Act (2010) including race, disability, sex, religion or belief, sexual orientation, gender reassignment, or other personal circumstances.

Bullying behaviour can be defined as an action, or number of repeated actions, causing harm to people or relationships. This behaviour could be intentional or unintentional and may be on-going. The definition equally encompasses physical or non-physical actions; therefore, the harm could be physical, emotional, or both.

A research review for the NSPCC produced a useful definition for the five essential components of bullying:

1. There is an intention to harm e.g. a person teasing another with the intention of deliberately upsetting them
2. There is a harmful outcome: a person or persons are hurt emotionally or physically
3. The act can be direct or indirect e.g. it could involve direct aggression such as kicking someone, or it could be an indirect act such as spreading rumours via Facebook
4. There is usually repetition from the perpetrator. However, for vulnerable pupils in TILT Education community, who may experience bullying, the repetition may be the repeat of the act by several individuals or groups of people
5. There is unequal power. A person or several persons who are (perceived as) more powerful due to, for example, their age or physical strength or size will abuse their power by bullying.

Bullying behaviour can be direct or indirect, simple or complex.

Direct bullying includes physical threats, verbal insults or taunts and directly contacting a person with obscene or insulting messages by using, for example, a mobile phone.

Indirect bullying includes persistently ignoring a pupil so that they feel socially isolated, spreading malicious rumours, or insults, often via social network sites on the Internet, or writing offensive graffiti.

Cyber-bullying uses technology to harm a person, group of people or a relationship and can happen both inside and outside of school and at any time of the day or night.

Bullying differs from **‘friendship fall-out’**, or other aggressive behaviour:

- “If two children or young people of about the same strength have the odd fight or quarrel. It is not bullying.” (Olweus 1989, 1993, 1999)

Where there is bullying:

- There is normally a power imbalance so that the victim does not feel able to defend him/herself
- It is usually persistent but could be an isolated incident
- It might relate to racism, homophobia, sexism, ageism
- It might relate to a disability or a special educational need (SEN). In these examples, victims may not be aware of being bullied
- There is normally an intention to cause harm, although there may be instances when there is a lack of awareness that the actions are harmful.

All bullying issues, whatever their nature, will be treated with equal importance and the response will be based upon the guidelines in the policy.

TILT Education will refer to the Anti Bullying Policy prior to considering Peer on Peer Abuse in line with our Whole School Safeguarding Policy.

Signs and Symptoms:

A victim may indicate by **signs** or behaviour that he or she is being bullied. These may include:

- Reluctance to attend school
- Unwillingness to travel on TILT Education bus/public transport
- Truancy from specific lessons
- Damage to clothing or possessions
- 'Losing' more items than usual
- Unexplained bruises/swellings
- Deterioration of school work/academic performance
- Being afraid to use the Internet
- Becoming jittery about receiving text messages
- Unkempt uniform
- Bullying towards siblings
- Taking money without permission
- Changes in mood, behaviour, or online activity
- Anxiety about group chats, online gaming, or social media use

Symptoms may include:

- Loss of appetite
- Headaches
- Stomach aches
- Stammering
- Sudden changes in behaviour
- Lack of confidence
- Signs of depression
- Nervous/edginess
- Difficulty in concentration
- Lack of motivation to complete work

These are examples, but this list is not exhaustive.

Reporting Bullying:

- Pupils are encouraged to report bullying to any trusted adult. Additional routes include worry boxes.
- Parents/carers may contact staff directly to report concerns.
- Staff must prioritise safety, then report incidents via LearnTrek
- All reports will be acknowledged within 24 hours and investigated within 5 school days.
- On acknowledgement, the DSL or Deputy DSL will carry out an initial risk assessment and put in place any immediate protective measures needed — for example adjusted timetables, supervised breaks, separate teaching spaces or a change to transport arrangements.
- A named member of staff will lead the investigation, recording accounts and statements on LearnTrek. Where an ongoing risk is identified, a written safety plan is agreed with the pupil and their parents/carers, shared with the staff who need it, and reviewed weekly until the risk is resolved.
- The parents/carers of the pupil who has been bullied and of the pupil alleged to have bullied are both kept informed of the progress and outcome of the investigation. Staff will confirm that action has been taken, but will not disclose to one family the details of any sanction, support or personal circumstances relating to another pupil, as that is that pupil's personal data.
- Reasonable adjustments are made to the reporting and investigation process for pupils with SEND, communication needs or experience of trauma — for example using visual supports, allowing a trusted adult to be present, adjusting how questions are asked, using written or drawn accounts, or splitting the conversation across several shorter sessions. The pupil's Pupil Passport is consulted before any interview.
- Staff who feel bullied by pupils or colleagues may raise concerns directly with the Proprietors.
- Staff who experience bullying or harassment from pupils, colleagues, parents/carers or visitors may raise it with the Headteacher or Proprietors, and may use the Anti Harassment Policy, the grievance route in the Staff Disciplinary Policy, or the Whistleblowing Policy where they would prefer to raise it that way.
- Where a concern is an allegation that an adult has harmed or may have harmed a child, it is handled under the Safeguarding and Child Protection Policy and the Staff Code of Conduct, and referred to the Local Authority Designated Officer (LADO). Concerns about the Head of Centre or Headteacher are reported directly to the LADO.

Responding to Bullying:

Stage 1: Creating a Safe Environment

Preventative measures include:

- Signing an Anti-Bullying Statement at induction
- Supervision during unstructured times
- Safe spaces for vulnerable pupils (e.g. common room)
- Curriculum work in PSHE, RSE, SMSC, Safer Internet Day and Anti-Bullying Week
- Peer mentoring and pupil-led anti-bullying initiatives

Stage 2: If Bullying Occurs

- Restorative approaches will be used where appropriate to help pupils reflect, take responsibility, and repair harm.
- Restorative approaches are used only where it is safe and proportionate to do so, and only where the pupil who has been bullied freely agrees to take part. They are not used where there is a continuing risk of harm, where the behaviour may amount to a criminal offence, or where the imbalance of power between the pupils would make a restorative meeting unfair. The DSL decides whether a restorative approach is suitable, following the initial risk assessment.
- Where a restorative approach is not appropriate, TILT Education applies the interventions and sanctions set out in the Behaviour for Success Policy, and escalates to safeguarding partners where the threshold is met. Declining a restorative meeting is never held against the pupil who has been bullied.
- Parents/carers will be informed and support offered to both victim and perpetrator.
- External support services (e.g. Childline, Kidscape, Young Minds, NSPCC) may be signposted.

Stage 3: If Restorative Approaches Fail

- Sanctions may include loss of privileges, exclusion from activities, internal exclusion, or in serious cases, fixed-term or permanent exclusion.
- Where bullying causes significant harm, the DSL will treat the matter as a safeguarding concern and will refer to children's social care via the Cheshire East Consultation Service (ChECS), and to the police where a criminal offence may have been committed. The Local Authority Designated Officer (LADO) is not the route for child-on-child harm: the LADO handles allegations against adults working with children, and is used only where an allegation concerns a member of staff, volunteer or contractor.
- In cases where bullying involves criminal behaviour (e.g. threats, harassment, online abuse), police involvement may be required.

Recording bullying and evaluating the policy:

When bullying of a pupil has been reported, statements will be taken from all relevant parties and stored as an attachment on LearnTrek.

When it is believed that bullying has occurred, the member of staff will log this on LearnTrek indicating the type of bullying and the names of the victim(s) and perpetrator(s). Detailed information about the incident will be stored on LearnTrek as well as other communication with pupils and parents such as a meeting or telephone call.

The measures taken, and sanctions imposed will be recorded and used to inform staff of trends, or to indicate which measures are most successful in ensuring that further bullying is prevented.



This anti-bullying policy will be reviewed and updated annually.

Records of bullying incidents are held securely on LearnTrek in line with the Data Protection Policy. Access to the detailed record is limited to the DSL, Deputy DSL and the member of staff leading the investigation. Records are retained for the period set out in the Data Protection Policy and then securely destroyed.

The DSL analyses recorded incidents each term by type of bullying, location and time of day, and considers whether any pupil group is disproportionately affected. Because of the small size of the cohort, this analysis is held and discussed internally only and is not published in any form from which an individual pupil could be identified. Findings inform staff training, supervision arrangements, and planning for PSHE, RSE and SMSC.

The policy is reviewed annually and after any serious incident, and the review is recorded. Findings from the termly analysis feed into the school improvement plan.

Making a parental complaint:

If a parent is not satisfied with the way a bullying issue has been addressed, they will be directed to the school's complaints procedure.

The Complaints Procedure sets out the stages, timescales and the panel stage required by Part 7 of the Education (Independent School Standards) Regulations 2014, including a panel member independent of the management and running of the school. Written records of meetings and of the actions taken are provided to parents/carers.

Where a safeguarding concern remains unresolved after the school's procedures have been exhausted, parents/carers may raise it with Cheshire East Safeguarding Children Partnership, or with the body responsible for inspecting and regulating TILT Education as an independent school. Contact details are available from the school office.

Strategies for Preventing Bullying:

- PSHE (Personal, Social and Health Education) and SMSC (Social, Moral, Spiritual and Cultural Education)
- Anti-bullying, respectful relationships, resilience and online safety are planned into the PSHE and RSE curriculum and reviewed through the whole-school curriculum quality assurance process, with content adapted for pupils with SEMH and communication needs.
- Pupils are asked how safe they feel at school at least annually, through structured pupil voice work supported by a trusted adult. Given the size of the cohort, responses are discussed in aggregate and pupils are not identified in any written summary. What pupils say is used to shape the following term's priorities.
- Assemblies
- Parent Review Meetings
- Restorative Practice
- Anti-Bullying Week in November
- Peer Mentoring.
- Annual pupil surveys to monitor experiences of bullying and safety
- Participation in Anti-Bullying Week

Links with other Policies:

- Behaviour for Success Policy
- E-Safety Acceptable Use
- E-Safety Policy
- Complaints Policy
- Safeguarding Policy
- SMSC Policy

Reference Documents:

- DfE (2017) *Preventing and Tackling Bullying*



- DfE (2012) *Reducing Bullying Amongst the Worst Affected*
- Olweus, D. (1989) *Cross-national research in self-reported crime and delinquency*
- DCSF (2008) *Bullying Involving Children with SEND*
- DfE (2026) *Keeping Children Safe in Education*
- *Working Together to Safeguard Children* (2026)



Appendices:

Appendices A

Date/time of incident	
Children involved (including bystanders)	
Where incident took place (playground, classroom, etc)	
Type of bullying (physical, verbal, indirect, cyber)	
Form of bullying (racist, religious, cultural, sexual, SEN/disability based, homophobic, biphobic, transphobic, related to home circumstances etc)	
Brief summary of incident (Also keep record of witness statements)	
Member/s of staff reported to/witnessed by	
Impact of incident	
Action taken	
Follow up action (including dates)	
Support offered to victim and perpetrator	
Signed (name)	