UNLOCKING POTENTIAL
LEVELLING THE SOCIAL AND ACADEMIC ARENA

ANTI-BULLYING POLICY

Mission Statement

The Levels School exists to provide a nurturing environment in which students with specific learning difficulties and co-occurring diagnoses can develop their self-esteem and aspire to be independent young adults who value the rights, responsibilities and rules that exist to promote and support their future welfare. Our approach toward establishing this ideology is predicated on trauma-informed practice and an obligation to develop the social skills required to build their future aspirational communities. We exist to help them find their level.

This policy covers all premises known as The Levels School.

Date of Policy	September 2025
Next review date	September 2026
Frequency of policy review (annually, every two years)	Annually
Policy owner	Ben Bridger/Caroline Cook
Published policy	Yes ☒ No ☐
List of connected policies	Relational, Student Expectations, Exclusion, Safeguarding.
Approved by	Approved by the Governors

The Board of Governors acknowledge their responsibility to ensure that this policy is effective and follows regulatory requirements. Governors undertake a review to satisfy themselves that the implementation of this policy is effective.
The Board of Governors ensures the establishment of familiarity with and the effective operation through monitoring, of school policies, approving those requiring GB sign-off in line with a regular cycle of school policy reviews. This occurs through a cycle of governor committee meetings and full board meetings.

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Anti-Bullying policy statement of intent

This policy is applicable to all students and has regard to; the education (independent school standards) regulations (ISSRs) 2014 paragraph 10; the equality act 2010, KCSIE September 2025 and current non-statutory DfE guidance: Preventing Bullying October 2017.

The community at The Levels School will be based upon respect, good manners and fair play. The school is committed to providing a safe and caring environment that is free from disruption, violence and any form of harassment so that every one of its students can develop his/her full potential. It expects its students to treat members of staff with courtesy and co-operation so that they can learn in a relaxed and orderly, atmosphere. All students should care for and support each other. The school prides itself on its inclusivity, respect and mutual tolerance.

Parents/guardians have an important role in supporting the school in maintaining high standards of behaviour. It is important that parents are involved, and the school makes sure that students are clear about the part they can play to prevent bullying, including when they find themselves as bystanders. It is essential that the school and their homes have consistent expectations of behaviour and that they co-operate closely together. Acceptance of this policy will form part of the school's parent contract.

Bullying, harassment, victimisation and discrimination will not be tolerated. All students and their parents are treated fairly and with consideration and they are expected to reciprocate towards each other, the staff and the school. Any kind of bullying is unacceptable. The school raises awareness for staff through training, so that the principles of the school policy are understood, legal responsibilities are known, action is defined to resolve and prevent problems and sources of support are available. The school will implement Restorative Justice processes where appropriate and disciplinary sanctions to follow which reflect the seriousness of an incident and convey a deterrent effect (e.g. Strong sanctions such as exclusion may be necessary in cases of severe and persistent bullying). The school has clear policies communicated to parents, students and staff and creates an environment of good behaviour and respect, with helpful examples set by staff and older students.

The school's policy is intended not only to help staff and students deal with bullying when it occurs but even more importantly to prevent it.

Definition of bullying

Bullying is referred to within a Safeguarding context as "Child-on-Child Abuse". However for the remainder of this policy we will use the terms interchangeably. Bullying may be defined as the intentional hurting, harming or humiliating of another student or group by physical (including sexual), verbal (including email, chat room and SMS messages) and emotional means (by excluding, tormenting or spreading malicious rumours). It can involve manipulating a third party to tease or torment someone. It can involve complicity that falls short of direct participation. Bullying is often hidden and subtle. It can also be overt and intimidating. Bullying is often motivated by and may involve

actions or comments on the grounds of race, religion, culture, sex, gender, homophobia, special educational needs and disability, or other physical attributes (such as hair colour or body shape), or because a child is adopted or is a carer.

It may occur directly or through cyber-technology (social websites, mobile 'phones, text messages, photographs and email). Bullying can happen anywhere and at any time and can involve everyone – students, other younger people, staff and parents there are many definitions of bullying but they all have three things in common:

- It is deliberate, hurtful, targeted behaviour.
- It is often repeated over a period of time.
- It is difficult for those being bullied to defend themselves. Bullying can take many forms, but the main types are:
    - Physical – hitting, kicking, taking or interfering with belongings.
    - Verbal – name-calling, insults, cultural, religious, homophobic, special education needs and disability or racial remarks - 'banter'.
    - Child/child - physical or verbal sexual/sexist abuse
    - Indirect – spreading nasty stories about someone; excluding someone from another social group.
    - Cyber - social websites, mobile phones, texting, sexting, photographs or email. Physical and emotional bullying are equally serious and may cause psychological damage.

We recognise that it is vital that all students understand what bullying is and are made aware that it will not be tolerated for students to directly act in a way that is bullying, to encourage or join in with behaviour that is deemed to be bullying or further to witness bullying and not report it.

Due to the nature of our school as a SEN provision we are aware that our students may be more vulnerable to being either the victim of or the perpetrator of bullying and that this may not always be apparent to them. We aim to promote transparency in human relationships so that children, by default, are held to account for the feelings that they may evoke in others. As a staff we will be sensitive to our students' vulnerability in relation to their social skills and communication needs and will ensure that all incidents of bullying are handled sensitively, without shaming and with further support and if appropriate counselling being offered to all students involved.

The school's response to bullying

The school intends to always treat bullying, including allegations of bullying, very seriously. It conflicts sharply with the school's policy on equal opportunities, as well as with its social and moral principles. Bullying can be so serious that it causes psychological damage, eating disorders, self-harm and even suicide and, whilst bullying is not a specific criminal offence, there are criminal laws which apply to harassment and threatening behaviour. Child on child abuse will be treated as a safeguarding issue and reported and dealt with as such by the Designated Safeguarding Lead (DSL). A bullying

incident will always be treated as a safeguarding concern when there is reasonable cause to believe that a child is suffering or likely to suffer significant harm.

Signs of bullying

Changes in behaviour that may indicate that a student is being bullied include:

- Unwillingness to return to school.
- Displays of excessive anxiety, becoming withdrawn or unusually quiet.
- Failure to produce work or producing unusually bad work or work that appears to have been copied, interfered with or spoilt by others.
- Books, bags and other belongings suddenly go missing or are damaged.
- Stealing money or asking for money, (to pay bullies).
- Change to established habits (e.g. Giving up music lessons, change of accent or vocabulary).
- Diminished levels of self-confidence.
- Becoming aggressive, disruptive or unreasonable.
- Displays fear and/or gives improbable excuses for behaviours.
- Is bullying someone else.
- Frequent visits to the medical centre with symptoms such as stomach pains, headaches.
- Stops eating.
- Unexplained cuts and bruises.
- Frequent absence, erratic attendance, late arrival to class.
- Choosing the company of adults.
- Displaying repressed body language and poor eye contact.
- Difficulty in sleeping, experiencing nightmares.
- Bed wetting.
- Talking of suicide or running away.

Although there may be other causes for some of the above symptoms, a repetition of or a combination of these possible signs of bullying should be investigated by parents and teachers. Bullying is a form (albeit extreme) of children learning how to pattern their behaviour in society. It may also include bystanders (innocent or otherwise). There are a number of important reasons for challenging bullying behaviour in schools:

- The safety and happiness of students. A bullied student is an unhappy student who may come to harm through physical or psychological damage and may even consider suicide.

- Educational achievement. An unhappy student may lose concentration and their work will suffer.
- Providing a model for helpful behaviour. Bullying that goes unchallenged may teach students that it is a quick and effective way of getting what they want.
- Reputation – recognition as a caring school with a pro-active anti-bullying policy. The school aims to provide a happy, secure atmosphere for both students and staff, recognising that bullying is an unacceptable part of modern life that should be minimised or prevented.

Students should not identify bullying as a problem in the school. However, bullying can happen in any school. Recognising its existence is the first stage of dealing with it and attempting to minimise it is a vital step forward. The following should be considered in order to minimise bullying:

- Students should be encouraged to behave responsibly with good manners and respect for others.
- Students should be listened to and opinions respected and valued.
- Items of value should not be brought to school and personal property should be respected.
- Students should be encouraged to report incidents of bullying to a member of staff.
- Staff should respond in a professional manner.
- Any investigation should ensure that both sides have a fair hearing.

Preventative measures

The school takes the following preventative measures:

All new students are briefed thoroughly on the school's expected standards of behaviour. They are told what to do if they encounter bullying. The school guarantees that whistle-blowers who act in good faith will not be penalised and will be supported. All new members of staff are given guidance on the school's anti-bullying policy and in how to react to allegations of bullying in their first week at the school. They are required to read the school's policy as part of their induction.

Appropriate assemblies are used to further explore the school's policy on bullying. Our PSHE programme is structured to give students an awareness of their social and moral responsibilities as they progress through the school. The programme is structured to enforce the message about community involvement and taking care of each other.

Educational elements such as personal, social and health education (PSHE) and assemblies (mentioned above), projects, drama, stories, literature, historical events, currents affairs and so on will be used to promote the school's policy on anti-bullying. They also reinforce this message by teaching moral and spiritual values that show bullying to be unacceptable and by developing social skills, with discussion of differences between people and the importance of avoiding prejudice-based language.

The school will provide student-support through our Mental Health Student Ambassadors and our SEMH Lead, to provide guidance and advice to fellow students in order to foster a community in which everybody recognises bullying behaviour and supports each other to avoid being drawn into such behaviour.

Raising awareness for staff through training will incorporate; taking action to reduce the risk of bullying at times and in places where it is most likely. Safeguarding and anti-bullying training will be provided to all staff and will form part of every new member of staff's induction programme. Support staff will also be directed to read a copy of this policy document. All students are encouraged to tell a member of staff at once if they know that bullying is taking place. All reported incidents are recorded and investigated at once. The school always monitors reported incidents. Staff are always on duty at times when students are not in class and are highly visible around the school site, particularly secluded or obscured areas where bullying might occur. They are alert to inappropriate language or behaviour.

The school will provide training to its student mentors which specifically covers the importance of offering support and assistance to younger and to vulnerable students. The school reserves the right to investigate incidents that take place outside school hours, on school visits and trips and that occur in the vicinity of the school, involving its students. The school welcomes feedback from parents and guardians on the effectiveness of its preventative measures.

Procedures for dealing with reported bullying

If an incident of bullying is reported, the following procedures are adopted:

- All incident or reports of bullying will be taken seriously and investigated as quickly as possible.
- The member of staff to whom it was reported or who first discovers the situation will control the situation, reassure and support the students involved.
- The member of staff will ensure that victim and perpetrator are separated and that the initial disclosure or witnessed event is noted in written form where possible.
- The victim may be interviewed on his/her own and asked to write an account of events.
- The perpetrator, together with all others who were involved, will be interviewed individually and asked to give or write an immediate account of events.
- The incident will then be recorded on **MyConcern**.
- All relevant staff, tutors and head of therapy will be informed.
- Should the incident require further action, such as disciplinary action, then the Head Teacher will be informed.

The victim will be interviewed at a later stage by one of the members of the pastoral team (tutor, Key worker or DSL) separately from the alleged perpetrator. It will be made

clear to him/her why revenge is inappropriate. He/she will be offered support to develop a strategy to help him or herself.

The team member will:

- Re-assure the victim(s).
- Ensure that they clearly understand the course of action that has been taken.
- Not make them feel inadequate or foolish.
- Offer concrete help, advice and support to the victim(s).

The alleged perpetrator will be interviewed at a later stage by a member of the pastoral team, separately from the victim, and it will be made clear why his/her behaviour was inappropriate and caused distress. He/she will be offered guidance on modifying his or her behaviour, together with any appropriate disciplinary sanctions.

The team member will:

- Explain clearly the sanction and why it is given.
- Make it plain to the perpetrator that the behaviour was distressing for the victim and is unacceptable and potentially dangerous.
- Encourage the perpetrator to see the victim's point of view.

The parents/guardians of all parties should be informed calmly, clearly and concisely, and invited to discuss the matter with leading staff members from the incident. Their support should be sought. Both sets of parents should be reassured that the incident has been dealt with and will not be held against anyone. A way forward, including disciplinary sanctions and counselling, should be agreed. This should recognise that suitable support is needed both for children who are being bullied and for students who victimise others, as well as dealing with appropriate disciplinary measures. A meeting involving all the parties, with close staff supervision, could be helpful in developing a strategy for all concerned to close the episode.

A monitoring and review strategy will be put in place. In very serious cases, and only after the Head Teacher has been involved, it may be necessary to make a report to the police or to the social services. However, it is the policy of the school to attempt to resolve such issues internally, unless the matter is of such gravity that a criminal prosecution is likely. If a criminal act has taken place, this must be reported to the police by the Head Teacher or, in her absence the Designated Safeguarding Lead (DSL). Full records of all incidents and any action/resolution will be kept on **MyConcern**. Other colleagues should be informed of the incident, especially if it arose out of a situation where everyone should be vigilant, e.g. Unsupervised areas. The incident should be brought to a close to ensure it does not linger on. Staff should think ahead to prevent a recurrence (if he/she has found the trigger) and bullying should be recorded clearly in such a way to enable patterns to be identified.

Things to avoid:

- Being over-protective – refusing to allow the victim to help him/herself.

- Assuming the perpetrator is all bad – try to look objectively at the alleged perpetrator and the incident.
- Keeping the whole incident to yourself because you have dealt with it.
- Trying to hide the incident from the parents of the victim or the alleged perpetrator.
- Informing the parents without having a constructive plan to offer both sides.

Communicate:

- Keep publicising this policy to students and staff.
- Integrate this policy with the normal curriculum.
- Keep parents informed. Let them know the school acts to prevent bullying not just to deal with bullying incidents.
- Build on what the School values.

The Head Teacher will have overall responsibility for the implementation and promulgation of this policy. This policy should be read in conjunction with the school's **Relational** and **Safeguarding** policies. Strong sanctions such as exclusion may be necessary in cases of severe and persistent bullying. Students will be encouraged to learn to look after their own possessions and to respect others' possessions. The Levels School expects students to be honest, helpful and polite and to work hard and to listen to others. Students will be encouraged to respect everyone and learn to value differences and diversity.

Sexual Harassment, Sexual Violence and Harmful Sexual Behaviours

Sexual harassment and sexual violence are very much a part of the child on child abuse spectrum, as such the majority of the procedures for managing disclosures and discovering events of this type, fall within the procedures outlined within this and the **Safeguarding** policy, with the following clarifications.

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adult students and school and college staff are supported and protected as appropriate

As a provision supporting young people with a range of specific learning needs we are constantly aware that our students are in a very vulnerable bracket when it comes to this form of abuse. Through their social skills & communication difficulties, receptive language difficulties and high levels of anxiety our students fit too easily into the statistical range of young people who make up both perpetrators and victims.

As such we:

- Ensure that both perpetrator and victim of a sexually related incident are supported through the process of managing the event, especially given the nature of our student's needs.

- Make clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Do not tolerate or dismiss sexually inappropriate language or sexual harassment as "banter", "part of growing up", "just having a laugh" or "kids being kids"
- Challenge behaviours (which are potentially criminal in nature), such as derogatory language, inappropriate touching or grabbing bottoms, breasts and genitalia. Dismissing or tolerating such behaviours risks normalising them.
- Understand that all of the above can be driven by wider societal factors beyond the school, such as everyday sexist stereotypes and everyday sexist language, which is why our engagement with parents is crucial to support the wider contextual safeguarding.
- Process all alleged incidents of sexual harassment, sexual violence and R&HSB as safeguarding issues and as such are logged through **MyConcern** and with the DSL.

Sexual Violence:

For the purpose of this policy, when referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

- **Rape**: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Assault by Penetration**: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents. 5
- **Sexual Assault**: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Sexual Harassment:

For the purpose of this policy, when referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Sexual harassment can include:

- **Sexual comments**, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;

- **Sexual "jokes" or taunting**;
- **Physical behaviour**, such as: deliberating brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and
- **Online sexual harassment**, which might include: non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as sexting); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

Sexual harassment creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

Risky & Harmful Sexual Behaviours (R&HSB):

Children's sexual behaviours exist on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviours are developmentally inappropriate and may cause developmental damage.

Harmful sexual behaviours can occur online and offline and can occur simultaneously between the two and should be considered in a child protection context.

When considering harmful sexual behaviours, ages and the stages of development of the children are critical factors to consider. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference in age or if one of the children is pre-pubescent and the other is not. The Brook sexual behaviours traffic light tool can help when considering harmful sexual behaviours. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

The detailed advice on harmful sexual behaviours is available from

- Rape Crisis or the Survivors Trust for details of the nearest centre.
- NSPCC: Harmful sexual behaviour
- NICE guidance for advice on, amongst other things: developing interventions; working with families and carers; and multi-agency working.

Due to the nature of our students, any incident of suspected Harmful Sexual Behaviours will be reported to the DSL and logged in **MyConcern**. The school will address inappropriate behaviour, as these can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Prevention

School plays an important role in preventative education and at the Levels School we will ensure that this is delivered through our whole school approach. Our school programme tackles such issues as:

- Healthy and respectful relationships
- What respectful behaviour looks and sounds like
- Gender roles, stereotyping, equality
- Body confidence and self-esteem
- Prejudiced behaviour
- That sexual violence and sexual harassment is always wrong
- Addressing cultures of sexual harassment.

This is delivered through our PSHE curriculum, assemblies, pastoral tutor times and upheld by all staff during unstructured school time with students (breaks and lunches).

Guidelines for teachers – assessing the risks

Where might bullying occur?

As teachers in a new school we will take the following measures to help us to identify where bullying may occur:

- A survey.
- Spot checks.
- Getting students to write about the school.
- Getting students to draw a plan of the school, with "danger" areas marked.
- The messages we give new intakes about bullying.
- Our procedures for integrating a student new to the school – our use of buddies, learning mentors and Principal students/Student Ambassadors.

As teachers in a new school we will ensure:

- All students know that the school cares about bullying.
- All students know they should speak out.
- All students know they will be listened to and supported.

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