

Anti-Bullying Policy

Parish Primary School

Date: April 2021
Review: April 2023



PARISH
CE Primary School
Part of the Aquinas Trust

Building Learning, Friendships and Faith.

Contents

Introduction	3
Aims and Objectives	3
Definition of Bullying	4
Roles and Responsibilities	5
Statutory Implications	6
Prevention.....	6
Signs and Symptoms	7
Preventing Peer-on-Peer Abuse	8
Cyberbullying	10
Procedures	10
Sanctions.....	11
Support	11
Strategies to Combat Bullying	12
Strategies to Help Pupils Deal with Bullying.....	13
How Staff Should Deal with Bullying	13
How Parents Should Deal with Bullying.....	13
Bullying outside of school	14

Introduction

We are committed to providing a caring, friendly and safe environment for all of our pupils so that they can learn in a relaxed and secure environment. Bullying of any kind is unacceptable at our school. If bullying does occur, all pupils should be able to 'tell' and know that incidents will be dealt with promptly and effectively.

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- Education and Inspections Act 2006
- Equality Act 2010
- Protection from Harassment Act 1997
- Malicious Communications Act 1988
- Public Order Act 1986
- Communications Act 2003
- Human Rights Act 1998
- Crime and Disorder Act 1998
- Education Act 2011
- DfE (2017) 'Preventing and tackling bullying'
- DfE (2018) 'Sexual violence and sexual harassment between children in schools and colleges'
- DfE (2018) 'Mental health and wellbeing provision in schools'
- DfE (2021) 'Keeping children safe in education (2020)'
- DfE (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'

This policy operates in conjunction with the following school policies:

- Behaviour and Exclusion Policy
- E-Safety Policy
- Safeguarding and Child Protection Policy
- Social, Emotional and Mental Health (SEMH) Policy
- Primary Relationships and Health Education Policy

Aims and Objectives

- All staff, governors, pupils and parents have an understanding of what constitutes bullying so that they are more able to combat it.
- People in the school community will not condone bullying.
- Clear procedures for reporting bullying are understood and followed.
- Prevention and support measures are understood and followed.
- An equal opportunities policy is endorsed by all members of the school and that racial and sexual harassment will not be tolerated.

The academy acknowledges its responsibility to eliminate racial, age, disability, gender or sexual orientation discrimination, harassment and victimisation and promote positive attitudes towards and between disabled persons, persons of different racial groups and genders, and sexual orientation. We aim to promote tolerance and challenge discrimination, harassment or victimisation within the school community including that which may result from association with others or perceived characteristics of individuals, even if these characteristics are mistaken.

The academy follows the Church of England's guidance (2017) on challenging homophobic, biphobic and transphobic bullying and promotes positive behaviour in relation to sexual orientation.

Incidences of racist, homophobic, biphobic and transphobic bullying are reported to the Aquinas Church of England Education Trust.

Definition of Bullying

For the purpose of this policy, “bullying” is defined as persistent behaviour by an individual or group with the intention of verbally, physically, or emotionally harming another person or group. Bullying is generally characterised by:

- **Repetition:** Incidents are not one-offs; they are frequent and happen over a period of time.
- **Intent:** The perpetrator(s) means to cause verbal, physical or emotional harm; it is not accidental.
- **Targeting:** Bullying is generally targeted at a specific individual or group.
- **Power imbalance:** Whether real or perceived, bullying is generally based on unequal power relations.

Many kinds of behaviour can be considered bullying, and bullying can be related to almost anything. Teasing another pupil because of their appearance, religion, ethnicity, gender, sexual orientation, home life, culture, disability, or SEND are some of the types of bullying that can occur.

Bullying is acted out through the following mediums:

- Verbally
- Physically
- Emotionally
- Online (cyberbullying)

Racist bullying: Bullying another person based on their ethnic background, religion or skin colour. Racist bullying is a criminal offence under the Crime and Disorder Act 1998 and Public Order Act 1986.

Homophobic/biphobic bullying: Bullying another person because of their actual or perceived sexual orientation.

Transphobic bullying: Bullying based on another person’s gender identity or gender presentation, or for not conforming to dominant gender roles.

Sexist bullying: Bullying based on sexist attitudes expressed in a way to demean, intimidate or harm another person because of their sex or gender. Sexist bullying may sometimes be characterised by inappropriate sexual behaviours.

Sexual bullying: Bullying behaviour that has a physical, psychological, verbal or non-verbal sexual dimension or dynamic that subordinates, humiliates or intimidates another person. This is commonly underpinned by sexist attitudes or gender stereotypes.

Prejudicial bullying: Bullying based on prejudices directed towards specific characteristics, e.g. SEND or mental health issues.

Relational bullying: Bullying that primarily constitutes of excluding, isolating and ostracising someone – usually through verbal and emotional bullying.

Socioeconomic bullying: Bullying based on prejudices against the perceived social status of the victim, including, but not limited to, their economic status, their parents’ occupations, their health or nutrition level, or the perceived “quality” of their clothing or belongings.

Roles and Responsibilities

The Trust and AAC are responsible for:

- Evaluating and reviewing this policy to ensure that it is not discriminatory.
- The overall implementation of this policy.
- Ensuring that the school adopts a tolerant and open-minded policy towards difference.
- Ensuring the school is inclusive.
- Analysing any bullying data to establish patterns and reviewing this policy in light of these.

The headteacher is responsible for:

- Reviewing and amending this policy, accounting for new legislation and government guidance, and using staff experience of dealing with bullying incidents in previous years to improve procedures.
- Keeping a Bullying Report Form of all reported incidents, including which type of bullying has occurred, to allow for proper analysis of the data collected.
- Analysing the data in the bullying record at termly intervals to identify trends, so that appropriate measures to tackle them can be implemented.
- Arranging appropriate training for staff members.

SLT are responsible for:

- Corresponding and meeting with parents where necessary.
- Providing a point of contact for pupils and parents when more serious bullying incidents occur.

All staff are responsible for:

- Being alert to social dynamics in their class.
- Being available for pupils who wish to report bullying.
- Providing follow-up support after bullying incidents.
- Being alert to possible bullying situations, particularly exclusion from friendship groups, and informing the pupil's heads of year of such observations.
- Refraining from stereotyping when dealing with bullying.
- Understanding the composition of pupil groups, showing sensitivity to those who have been the victims of bullying.
- Reporting any instances of bullying once they have been approached by a pupil for support.

The family worker and counsellor are responsible for:

- Offering emotional support to victims of bullying.
- Alerting SLT regarding any incidents of bullying.

Parents are responsible for:

- Informing their child's class teacher if they have any concerns that their child is the victim of bullying or involving in bullying in anyway.
- Being watchful of their child's behaviour, attitude and characteristics and informing the relevant staff members of any changes.

Pupils are responsible for:

- Informing a member of staff if they witness bullying or are a victim of bullying.
- Not making counter-threats if they are victims of bullying.
- Walking away from dangerous situations and avoiding involving other pupils in incidents.
- Keeping evidence of cyberbullying and informing a member of staff should they fall victim to cyberbullying.

Statutory Implications

The school understands that, under the Equality Act 2010, it has a responsibility to:

- Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the act.
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it.
- Foster good relations between people who share a protected characteristic and people who do not share it.

The school understands that, under the Human Rights Act (HRA) 1998, it could have charges brought against it if it allows the rights of pupils to be breached by failing to take bullying seriously. The headteacher will ensure that this policy complies with the HRA; the headteacher understands that they cannot do this without fully involving their teaching staff.

Although bullying itself is not a criminal offence, some types of harassment, threatening behaviour and/or communications may be considered criminal offences:

- Under the Malicious Communications Act 1988, it is an offence for a person to electronically communicate with another person with the intent to cause distress or anxiety, or in a way which conveys a message which is indecent or grossly offensive, a threat, or contains information which is false and known or believed to be false by the sender.
- The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct amounting to harassment.
- Section 127 of the Communications Act 2003 makes it an offence to send, by means of a public electronic communications network, a message, or other matter, that is grossly offensive or of an indecent, obscene or menacing character. It is unlawful to disseminate defamatory information through any media, including internet sites.
- Other forms of bullying which are illegal and should be reported to the police include violence or assault, theft, repeated harassment or intimidation, and hate crimes.

Prevention

- The school will clearly communicate a whole-school commitment to addressing bullying.
- All reported instances of bullying will be investigated by a member of staff.
- All types of bullying will be discussed as part of the relationships and health education curriculum, in line with the Primary Relationships and Health Education Policy.
- Staff will encourage pupil cooperation and the development of interpersonal skills using group and pair work. Diversity, difference and respect for others will be promoted and celebrated through various lessons.
- Seating plans will be organised and altered in a way that prevents instances of bullying. Potential victims of bullying will be placed in working groups with other pupils who do not abuse or take advantage of others.
- Opportunities to extend friendship groups and interactive skills will be provided through participation in special events, e.g. drama productions, sporting activities and cultural groups.
- All members of the school will be made aware of this policy and their responsibilities in relation to it. All staff members will receive training on identifying and dealing with the different types of bullying.
- A safe place, supervised by a teacher, will be available for pupils to go to during free time if they feel threatened or wish to be alone. The teacher supervising the area will speak to pupils to find out the cause of any problems and, ultimately, stop any form of bullying taking place.

- Pupils deemed vulnerable, will meet with a member of staff on a regular basis, where appropriate, to ensure any problems can be actioned quickly. The school will also offer an 'open door' policy allowing pupils to discuss any bullying, whether they are victims or have witnessed an incident.
- The school will be alert to, and address, any mental health and wellbeing issues amongst pupils, as these can be a cause of bullying behaviour.
- The school will be alert to instances of the sharing of indecent imagery of pupils amongst the school cohort and will evaluate the whether the instance is part of normal sexual development or whether it presents a safeguarding concern; the latter instances will be managed in line with the Child Protection and Safeguarding Policy.
- The school will ensure potential perpetrators are given support as required, so their educational, emotional and social development isn't negatively influenced by outside factors, e.g. mental health issues.

Signs and Symptoms

A child or young person may indicate by signs or behaviour that he or she is being bullied. Adults should be aware that these are possible signs and that they should investigate if a child:

- Is frightened of walking to or from school
- Is unwilling to go to school
- Persistently late for school
- Repeated or persistent absence from school
- Becoming anxious or lacking confidence
- Wants to remain with adults
- Spurious illnesses: headaches, stomach aches, fainting, vomiting
- Decreased involvement in school work
- Becomes withdrawn, starts stammering
- Leaving school with torn clothes or damaged possessions
- Has possessions go 'missing' or money 'lost'
- Becomes distressed, stops eating, lack of appetite
- Cries easily, has nightmares
- Becomes disruptive, aggressive or short tempered
- Cuts or bruises
- Starts stealing money (to pay bully)
- Is frightened to say what is wrong
- Attempts suicide or runs away
- Unwillingness to use the internet or mobile devices
- Becoming agitated when receiving calls or text messages
- Lack of eye contact
- Change in behaviour and attitude at home

Although the signs outlined above may not be due to bullying, they may be due to deeper social, emotional or mental health issues, so are still worth investigating. Pupils who display a significant number of these signs will be approached by a member of staff to determine the underlying issues causing this behaviour.

Staff will be aware of the potential factors that may indicate a pupil is likely to exhibit bullying behaviours, including, but not limited to, the following:

- They have experienced mental health problems, which have led to them becoming more easily aggravated
- They have been the victim of abuse

- Their academic performance has started to fall and they are showing signs of stress

If staff become aware of any factors that could lead to bullying behaviours, they will notify the class teacher or a member of SLT, who will investigate the matter and monitor the situation.

Preventing Peer-on-Peer Abuse

The school has a zero-tolerance approach to all forms of peer-on-peer abuse, including sexual harassment and sexual violence.

Sexual harassment refers to unwanted conduct of a sexual nature that occurs online or offline. Sexual harassment violates a child's dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence.

Sexual violence refers to the three following offences:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their 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 they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Sexual Assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

The school's Safeguarding and Child Protection Policy outlines our stance on addressing peer-on-peer sexual abuse, and the procedures in place will be adhered to if any instances of sexual harassment or sexual violence be uncovered.

To prevent peer-on-peer abuse and address the wider societal factors that can influence behaviour, the school will educate pupils about abuse, its forms, and the importance of discussing any concerns and respecting others through the curriculum, assemblies and PSHE lessons. The school will also ensure that pupils are taught about safeguarding, including online safety, as part of a broad and balanced curriculum in PSHE lessons, relationships education and group sessions. Such content will be specific to age and stage of development, and tackle issues such as the following:

- Healthy relationships
- Respectful behaviour
- Gender roles, stereotyping and equality
- Body confidence and self-esteem
- Prejudiced behaviour
- That sexual violence and sexual harassment is always wrong
- Addressing cultures of sexual harassment

All staff will be aware that pupils of any age and sex are capable of abusing their peers and will never tolerate abuse as "banter" or "part of growing up". Staff will also be aware that peer-on-peer abuse can be manifested in many ways, including sexting, sexual harassment and assault, and hazing/initiation-type violence.

Where a pupil is found to have been involved in harmful sexual behaviour, the school will help the pupil to move forward from the incident by supporting them in adopting more positive behaviour patterns and attitudes.

All staff will be made aware of the heightened vulnerability of pupils with SEND, who are more likely to be abused than their peers. Staff will not assume that possible indicators of abuse relate to the pupil's SEND and will always explore indicators further.

Staff will be aware that LGBTQ+ pupils are more likely to be targeted by their peers. In some cases, pupils who are perceived to be LGBTQ+, whether they are or not, can be just as vulnerable to abuse as LGBTQ+ pupils.

The school's response to sexual violence and sexual harassment between pupils of the same sex will be equally as robust as it is for incidents between pupils of the opposite sex.

Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled – this includes the process for reporting concerns about friends or peers.

If a pupil has been harmed, is in immediate danger or is at risk of harm, a referral will be made to children's social care services.

Managing disclosures

Victims will always be taken seriously, reassured, supported and kept safe. Victims will never be made to feel like they are causing a problem or made to feel ashamed.

If a friend of a victim makes a report or a member of staff overhears a conversation, staff will act – they will never assume that someone else will deal with it. The basic principles remain the same as when a victim reports an incident; however, staff will consider why the victim has not chosen to make a report themselves and the discussion will be handled sensitively and with the help of social services where necessary.

Staff will report all allegations of abuse against pupils to the DSL. If staff are in any doubt over how to handle an incident or report, they will speak to the DSL.

If a report involves a pupil with SEND, the DSL will record the incident in writing and, working with the SENCO, decide what course of action is necessary, with the best interests of the pupil in mind at all times.

Confidentiality

The school will only engage with staff and agencies required to support the victim and/or be involved in any investigation. If a victim asks the school not to tell anyone about the disclosure, the school will not make this promise. Even without the victim's consent, the information may still be lawfully shared if it is in the public interest and protects children from harm. The school's Pupil Confidentiality Policy will be adhered to at all times.

The DSL will consider the following when making confidentiality decisions:

- Parents will be informed unless it will place the victim at greater risk
- If a pupil is at risk of harm, is in immediate danger or has been harmed, a referral will be made to social services.
- Rape, assault by penetration and sexual assault are crimes – reports containing any such crimes will be passed to the police

More information regarding the school's stance on preventing peer-on-peer sexual abuse is available in our Safeguarding and Child Protection Policy.

Cyberbullying

The school has a Cyberbullying Policy in place, which outlines the school's zero-tolerance approach to cyberbullying. The school views cyberbullying with the same severity as any other form of bullying and will follow the sanctions set out in this policy if they become aware of any incidents.

The school will support pupils who have been victims of cyberbullying by holding formal and informal discussions with the pupil about their feelings and whether the bullying has stopped, in accordance with this policy.

In accordance with the Education Act 2011, the school has the right to examine and delete files from pupils' personal devices, e.g. mobiles phones, where there is good reason to do so. This power applies to all schools and there is no need to have parental consent to search through a young person's mobile phone.

Procedures

The school will ensure that prevention is a prominent aspect of its anti-bullying vision.

Staff will treat reports of bullying seriously and they will not ignore signs of suspected bullying. Staff will act immediately when they become aware of a bullying incident. Unpleasantness from one pupil towards another will always be challenged and will never be ignored.

Staff will always respect pupils' privacy, and information about specific instances of bullying are not discussed with others, unless the pupil has given consent, or there is a safeguarding concern. If a member of staff believes a pupil is in danger, e.g. of being hurt, they will inform the DSL immediately.

Follow-up support will be given to both the victim and perpetrator in the months following an incident to ensure all bullying has stopped.

When an incident of bullying has been reported to an appropriate member of staff, the following procedure should apply:

- All incidents of bullying must be reported to school staff and recorded. Any suggestion that the incident may be racially motivated must be recorded as such.
- The incident will be recorded by the member of staff on Safeguard which sends an immediate alert to the DSL
- In serious incidents, the case will be reported to the Headteacher. It will be recorded on Safeguard. The parents will be informed and invited to attend a meeting in school to discuss the problem.
- The victim will be reassured that the matter is being dealt with and should speak to a member of staff if there is any recurrence of bullying.
- An attempt will be made to help the bully change their behaviour and they will be told that the bullying must stop.
- The bully will offer an apology.
- In exceptional cases either a fixed term or permanent exclusion will be considered.
- Wherever possible the pupils will be reconciled.
- Incidents of racial harassment will be reported to the Trust

Minor incidents will be reported to the victim's class teacher, who will investigate the incident, set appropriate sanctions for the perpetrator and inform the phase leader of the incident and outcome. All actions and details of the incident must be logged on Safeguard.

When investigating a bullying incident, the following procedures will be adopted:

- The victim, alleged perpetrator and witnesses are all interviewed separately.
- Members of staff ensure that there is no possibility of contact between the pupils being interviewed, including electronic communication.
- If a pupil is injured, members of staff take the pupil immediately to a first aider for a medical opinion on the extent of their injuries.
- A room is used that allows for privacy during interviews .
- A witness is used for serious incidents.
- If appropriate, the alleged perpetrator, the victim and witnesses are asked to write down details of the incident; this may need prompting with questions from the member of staff to obtain the full picture.
- Premature assumptions are not made, as it is important not to be judgemental at this stage .
- Members of staff listen carefully to all accounts, being non-confrontational and not assigning blame until the investigation is complete.
- All concerned pupils are informed that they must not discuss the interview with other pupils

Due to the potential for some specific forms of bullying to be characterised by inappropriate sexual behaviour, staff members involved in dealing with the incident are required to consider whether there is a need for safeguarding processes to be implemented.

Sanctions

If the headteacher is satisfied that bullying did take place, the pupil will be helped to understand the consequences of their actions and warned that there must be no further incidents. The headteacher will inform the pupil of the type of sanction to be used in this instance, e.g. removal from the playground, service-based activities, and future sanctions if the bullying continues.

If possible, the headteacher will attempt reconciliation and will obtain an apology from the perpetrator. This will either be in writing to the victim (and/or witnesses if appropriate), or face-to-face, but only with the victim's full consent. Discretion will be used here; victims will never feel pressured into a face-to-face meeting with the perpetrator.

Parents are informed of bullying incidents and what action is being taken.

The class teacher and phase leader informally monitor the pupils involved over the next half term.

Where there have been serious or consistent incidents of bullying, the school will act in line with the Exclusion Policy.

Support

For a month after the initial complaint of bullying, the class teacher will hold an informal discussion with the victim, on a weekly basis, to check whether the bullying has stopped.

The phase leader with the class teacher holds a formal meeting, on a monthly basis, to check whether the bullying has stopped – these formal meetings will continue to take place once a month until the phase leader and victim are confident the bullying has stopped. The victim will be encouraged to tell a trusted adult in school if bullying is repeated.

If necessary, group dynamics will be broken up by members of staff by assigning places in classes. The victim will be encouraged to broaden their friendship groups by joining lunchtime or after-school clubs or activities.

Staff, particularly the DSL, will work with the victim to build resilience, e.g. by offering emotional therapy.

The school will acknowledge that bullying may be an indication of underlying mental health issues. Perpetrators will be required to attend a session with the family worker or counsellor, to assist with any underlying mental health or emotional wellbeing issues. The school will work with the perpetrator regarding any underlying mental health or emotional wellbeing problems.

The progress of both the perpetrator and the victim will be monitored by their class teachers. One-on-one sessions to discuss how the victim and perpetrator are progressing may be appropriate. If appropriate, follow-up correspondence will be arranged with parents one month after the incident.

Pupils who have been bullied will be supported in the following ways:

- Being listened to
- Having an immediate opportunity to meet with a member of staff of their choice
- Being reassured
- Being offered continued support
- Being offered counselling, where appropriate

Pupils who have bullied others will be supported in the following ways:

- Receiving a consequence for their actions
- Being able to discuss what happened
- Being helped to reflect on why they became involved
- Being helped to understand what they did wrong and why they need to change their behaviour
- Appropriate assistance from parents

Pupils who have been bullied will be assessed on a case-by-case basis and the DSL will, if necessary, refer the victim of bullying to external agencies.

In cases where the effects of bullying are so severe that the pupil cannot successfully reintegrate back into the school, the headteacher and DSL will look to transfer the pupil to another mainstream school with the consent and involvement of the pupil's parents.

Where a pupil who has been the victim of bullying has developed such complex needs that alternative provision is required, the pupil, their parents, the headteacher and DSL will meet to discuss the use of alternative provision.

Strategies to Combat Bullying

Befriending

Assign a volunteer to be with and befriend pupils who are being bullied or having difficulties because they are new to the school or upset by an event outside school, e.g. a family bereavement. The objective is to give the befriended pupil someone to talk to and to help them feel more positive about themselves.

Circle of Friends

A small number of pupils volunteer to form a circle of friends for a vulnerable pupil to help improve

the pupil's level of inclusion and acceptance and to increase insight into his or her feelings and behaviour.

Mediation by adults

Staff can help establish ground rules between pupils who are being bullied and the pupils who are doing the bullying to help them co-exist in school. The member of staff should suggest the children come and see him/her regularly (at the end of the week) for a short period to check that the relationship has improved.

Strategies to Help Pupils Deal with Bullying

Children will be taught how to deal with a bully:

First occasion

Put your hands up with your palms facing the bully and say, 'Stop doing that, I don't like it' *Putting the hands up is defensive and assertive action and puts up a barrier between the child and the bully.*

Second occasion

Put your hands up with your palms facing the bully and say, 'If you don't stop, I'll do something about it'.

Third occasion

Tell an adult

The adult will then ask the child

'What has he/she done to you?'

'What have you done about it?'

Children need to learn to be confident and assertive.

Other strategies

- Stay calm
- Laugh or ignore comments and teasing
- Tell them to go away
- Shout 'NO' and walk away
- Stay with a crowd – bullies usually pick on others who are alone

How Staff Should Deal with Bullying

- Tell the children that bullying is not tolerated at Parish School
- Teach children strategies to deal with bullies
- Agree a set of class rules
- Agree a set of class solutions/sanctions
- Discuss ways to help bullies to become part of a group
- If the bully is part of a group break up the group dynamics We will monitor bullying incidents regularly.

How Parents Should Deal with Bullying

- Be aware of the signs and symptoms of bullying
- Take bullying seriously and find out the facts when told about an incident.
- Talk to the teacher or Headteacher.
- Help the child to practice strategies such as saying 'no', walking away with confidence.
- Arrange to meet your child, if the bullying is happening on the way to or from school.

Bullying outside of school

The headteacher has a specific statutory power to discipline pupils for poor behaviour outside of the school premises. Section 89(5) of the Education and Inspections Act 2006 gives the headteacher the power to regulate pupils' conduct when they are not on school premises, and therefore, not under the lawful charge of a school staff member.

Teachers have the power to discipline pupils for misbehaving outside of the school premises. This can relate to any bullying incidents occurring anywhere off the school premises, such as on school or public transport, outside the local shops, or in a town or village centre.

Where bullying outside school is reported to school staff, it will be investigated and acted upon. In all cases of misbehaviour or bullying, members of staff can only discipline the pupil on school premises, or elsewhere when the pupil is under the lawful control of the member of staff, e.g. on a school trip.

The headteacher is responsible for determining whether it is appropriate to notify the police of the action taken against a pupil. If the misbehaviour could be of a criminal nature or poses a serious threat to a member of the public, the police will be informed.

As a result of the Trust's statutory responsibility, the Trust will receive personal data, some of which will be sensitive personal data. The Trust processes personal data in accordance with the data protection principles embodied in the General Data Protection Regulations (GDPR) and the Data Protection Act 2018 (DPA). The Trust complies with the requirements of the data protection legislation as detailed in the Trust data protection Policy.

All staff are aware of the principles of data protection and will not process personal data unless necessary. The Trust safeguards the personal data it collects through the operation of the Trust's data protection policy and processes and the IT policy. In addition, the Trust and the relevant academy has taken steps to ensure that all its contracts that process data have the GDPR compliant provisions.