



VTC

ANTI-BULLYING POLICY

Approved by:	The Proprietor & The Advisory Board	Date:
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In this policy, “learner” is VTC’s preferred term. Legislation and Department for Education guidance may use “pupil” or “child”. “Parent” includes carers and others with parental responsibility where appropriate.

1. Purpose and scope

VTC is committed to providing a positive, safe, respectful and caring learning environment in which learners can participate, learn and prepare for adult life without fear of bullying, intimidation, prejudice or harassment.

This policy sets out the school’s strategy for preventing bullying so far as reasonably practicable, identifying concerns early, responding promptly and consistently, supporting everyone affected, and using patterns of information to improve school practice.

The policy applies to bullying between learners on school premises and during school activities. VTC will also respond to online or off-site conduct where it affects the safety, welfare, learning, relationships or orderly running of the school, in accordance with the Behaviour Policy and safeguarding procedures.

Because VTC includes older learners, safeguarding routes are age-sensitive. Keeping Children Safe in Education applies to children under 18. Concerns involving learners aged 18 or over will still be acted on through VTC safeguarding procedures and, where appropriate, adult safeguarding, police, health or other external services.

2. VTC anti-bullying principles

VTC is a special SEMH setting. Our approach is relational, child-centred and restorative, while maintaining clear boundaries and an unequivocal expectation that bullying is not acceptable. Behaviour may be communication, but understanding the reason for behaviour does not mean ignoring its impact on others.

- Every learner has the right to feel safe, respected and able to learn.
- All reports of bullying will be taken seriously, including reports made by witnesses or by parents/carers.
- Learners will be listened to in a way that reflects their communication needs, SEND, developmental level and emotional state.
- No learner will be blamed for experiencing bullying or disadvantaged because they reported it.
- Prevention, education, early intervention and positive relationships are preferred to purely punitive responses.
- Consequences will be proportionate and consistent with the Behaviour Policy, with reasonable adjustments where legally required.
- Restorative work will only be used when it is safe, appropriate and voluntary; it will never replace safeguarding action or be imposed on a learner who does not wish to participate.
- Safeguarding concerns will be referred to the DSL without delay and will not be managed only as a behaviour matter.
- Parents/carers will be involved appropriately, subject to safeguarding, confidentiality and the learner's age/circumstances.
- VTC will monitor patterns and take action where bullying is repeated, targeted, discriminatory, sexual, online or linked to a power imbalance.

3. Legal and regulatory framework

VTC is an independent school in England. The Proprietor has ultimate responsibility for ensuring the Independent School Standards are met and implemented effectively.

3.1 Core requirements

- **Independent School Standards:** Schedule 1, Part 3, paragraph 10 of the Education (Independent School Standards) Regulations 2014 (as amended) requires the Proprietor to ensure that bullying is prevented so far as reasonably practicable through the drawing up and implementation of an effective anti-bullying strategy.
- **Safeguarding:** Part 3, paragraph 7 of the Independent School Standards requires arrangements to safeguard and promote the welfare of pupils, having regard to Secretary of State guidance. VTC therefore applies Keeping Children Safe in Education 2026 to learners under 18.
- **Equality Act 2010:** VTC must not unlawfully discriminate against, harass or victimise learners and must make reasonable adjustments for disabled learners where required. The school also promotes respect for protected characteristics through its curriculum and wider culture.
- **RSE/RSHE:** The revised statutory Relationships Education, Relationships and Sex Education (RSE) and Health Education guidance came into force on 1 September 2026 and supports teaching about respectful relationships, consent, online behaviour, harassment and bullying.
- **Information to parents:** Independent schools must make particulars of their anti-bullying arrangements available to parents of current and prospective pupils in accordance with Part 6 of the Independent School Standards.

3.2 Department for Education guidance used by VTC

- Preventing and tackling bullying: advice for headteachers, staff and governing bodies (non-statutory guidance applying to all schools).
- Keeping Children Safe in Education 2026 (statutory safeguarding guidance).
- Relationships Education, Relationships and Sex Education (RSE) and Health Education statutory guidance, revised for September 2026.
- Independent School Standards guidance, April 2026.
- Preventing and tackling the bullying and harassment of school staff, July 2026, where conduct is directed at staff.

4. Definitions

4.1 Bullying

Bullying is behaviour by an individual or group that is intentionally hurtful, is repeated or has a repeated effect, and involves an imbalance of power that makes it difficult for the person affected to defend themselves or stop the behaviour.

A power imbalance may relate to physical strength, popularity, social status, age, communication skills, disability, access to information or images, group size, online reach, or another factor. Online content posted once can have a repeated impact when it is shared, viewed, copied or redistributed.

4.2 Behaviour that may not meet the bullying definition

A one-off disagreement, argument, friendship problem or isolated unkind act may not meet the definition of bullying. It must still be addressed. A single incident may also be serious enough to require a safeguarding response, a Behaviour Policy consequence, a risk assessment or referral to external agencies.

5. Forms of bullying

Type	Examples
Emotional / relational	Deliberate exclusion, humiliation, manipulation of friendships, spreading rumours, coercion, intimidation, threatening to withdraw friendship or encouraging others to isolate someone.
Verbal	Name-calling, taunting, threats, mocking, repeated insulting comments, offensive jokes or comments about a person or group.
Physical	Hitting, kicking, pushing, spitting, unwanted physical contact, damaging or taking belongings, blocking movement, or other deliberate use of physical intimidation.
Prejudice-based / discriminatory	Bullying connected to an actual or perceived protected characteristic, SEND, nationality, culture, appearance, family circumstances or other identity/difference.
Sexual / sexist	Sexual comments, rumours, sexualised name-calling, unwanted attention, pressure, gestures or conduct. Where behaviour may be sexual harassment, sexual violence or harmful sexual behaviour, safeguarding procedures apply.
Online / cyberbullying	Bullying through messaging, social media, gaming, email, images, videos, group chats, fake accounts, AI-generated content or other digital technology.
Extortion / coercion	Pressuring someone to hand over money or property, complete tasks, share passwords/content, use substances, commit an act, or keep something secret.
Damage / theft as bullying	Repeated or targeted taking, hiding or damaging of belongings where used to intimidate, humiliate or control another person.

6. Prejudice-based and discriminatory bullying

VTC will actively prevent and respond to prejudice-based bullying, including bullying connected to a person's actual, perceived or associated characteristics. This includes intersectional bullying where more than one characteristic is targeted.

- Race, colour, nationality, ethnicity or national origin, including racist language and racial harassment.

- Religion or belief, including antisemitism, anti-Muslim hostility and hostility towards people with no religion or belief.
- Disability, SEND, neurodivergence, communication differences or medical conditions.
- Sex, including sexist bullying and misogynistic or misandrist abuse.
- Sexual orientation, including homophobic, biphobic or perceived-orientation bullying.
- Gender reassignment, including transphobic bullying, in line with the Equality Act 2010.
- Pregnancy or maternity.
- Age or marriage/civil partnership where these are used as a basis for bullying, even though the school education provisions of the Equality Act treat these characteristics differently.
- Other circumstances such as appearance, body image, care experience, family circumstances, socio-economic background, being a young carer, language/accent, or any other perceived difference.

Staff will challenge prejudicial language and stereotypes even where the speaker says no harm was intended. The response will be educational and proportionate, and serious or repeated incidents will be managed through the Behaviour Policy and safeguarding procedures as appropriate.

7. Online and off-site bullying

Online bullying can occur at any time and can rapidly involve a wide audience. It may include abusive messages, exclusion from group chats, impersonation, harassment, threats, distribution of images, doxxing, non-consensual sharing, edited/AI-generated content, or repeated public humiliation.

- Learners should not forward, like, comment on or redistribute harmful content. Where safe, they should preserve evidence and report it to a trusted adult.
- Staff should not ask learners to repeatedly display distressing material. Evidence should be handled proportionately and in line with safeguarding and data-protection procedures.
- If content involves nude or semi-nude images, sexual content, threats, criminal conduct or a risk of significant harm, the DSL must be informed immediately and relevant safeguarding guidance followed.
- VTC may respond to online/off-site bullying under the Behaviour Policy where it affects learners or staff, creates a safeguarding risk, disrupts school, or damages the safe and respectful environment expected by VTC.
- Where appropriate, the school will support families to report content to platforms, service providers or the police and to use available blocking/reporting tools.

8. Bullying, safeguarding and child-on-child abuse

Bullying can be a form of child-on-child abuse. Keeping Children Safe in Education 2026 makes clear that child-on-child abuse can include bullying (including cyberbullying, prejudice-based and discriminatory bullying), physical abuse, abuse in intimate relationships, sexual violence, sexual harassment, sharing intimate images, upskirting and initiation/hazing-type behaviour.

Any member of staff who believes a bullying concern may involve abuse, exploitation, significant harm, sexual behaviour, coercion, serious violence, a weapon, self-harm risk, hate crime or another safeguarding concern must report it to the DSL or deputy DSL without delay and follow the Child Protection and Safeguarding Policy.

- The fact that behaviour may be described as “banter”, “part of growing up” or mutual conflict does not prevent it from being abuse.
- Victims will be reassured that they are being taken seriously and will not be made to feel that they are creating a problem by reporting.
- Risk and needs assessments will be used where appropriate to protect those involved and to plan education, supervision and support.
- The school will consider whether early help, children’s social care, police, health or other specialist services should be involved.

- For learners aged 18 or over, the school will use appropriate adult safeguarding and external-agency routes where necessary.

9. Roles and responsibilities

9.1 Proprietor

- Ensures that VTC has and effectively implements an anti-bullying strategy that meets paragraph 10 of the Independent School Standards.
- Ensures the strategy is appropriately linked to safeguarding, behaviour, equality, online safety and complaints arrangements.
- Receives assurance on implementation, patterns and significant concerns and requires action where standards are not being met.
- Ensures required information about VTC's anti-bullying arrangements is made available to parents and prospective parents.

9.2 Advisory Board

The Advisory Board supports the Proprietor and Headteacher through scrutiny, challenge and review of this policy and anonymised monitoring information. It does not normally investigate individual incidents or replace the school's complaints procedure.

9.3 Headteacher / Senior Leadership Team

- Lead a culture in which bullying is prevented, reported and addressed promptly.
- Ensure staff understand the policy and apply it consistently across all sites and phases.
- Ensure serious, repeated, discriminatory, sexual or safeguarding-related incidents are escalated appropriately.
- Ensure learners and parents know how to report concerns and how concerns will be managed.
- Review data at least termly and commission action where trends or disproportionality are identified.

9.4 Designated Safeguarding Lead

- Provides safeguarding oversight where bullying may be child-on-child abuse or another safeguarding concern.
- Ensures appropriate risk/needs assessment, referral, information-sharing and recordkeeping.
- Advises staff on when bullying should be managed alongside or instead of ordinary behaviour procedures.
- Coordinates with external agencies where required.

9.5 All staff

- Model respectful behaviour and challenge bullying, discrimination and prejudicial language.
- Listen carefully, record concerns factually and report them through the correct school system.
- Do not promise confidentiality where safeguarding information needs to be shared.
- Act immediately if anyone is at risk of harm.
- Use individual behaviour/support plans and reasonable adjustments without minimising the impact of bullying on others.
- Avoid labelling learners permanently as "victims" or "bullies"; focus on behaviour, safety, accountability and change.

9.6 Learners

- Treat others with respect and follow the Learner Code of Conduct.
- Report bullying they experience or witness to a trusted adult as soon as possible.
- Do not join in, encourage, share or redistribute harmful online/offline behaviour.
- Engage with support, reflection and restorative work where appropriate.

9.7 Parents and carers

- Raise concerns with VTC promptly and share relevant information or evidence.
- Support their child to report rather than retaliate or fight back.
- Do not approach or confront another learner or family directly about an allegation.
- Work with the school on agreed safety, support and behaviour plans.
- Use the school's Complaints Policy if concerns about the school's handling of bullying remain unresolved.

10. Prevention and education

The Independent School Standards require prevention so far as reasonably practicable. VTC therefore uses a whole-school strategy rather than waiting for incidents to occur.

- Clear behaviour expectations, routines and visible messages about respect, kindness, safety and inclusion.
- PSHE/RSE teaching (VECTOR), mentoring and curriculum work on healthy relationships, consent, conflict, online behaviour, discrimination, stereotypes, British values and respectful disagreement.
- Age and developmentally appropriate teaching about cyberbullying, harmful content, sharing images and how to seek help.
- Learner voice, check-ins and opportunities for learners to identify unsafe places, times or behaviours.
- Induction for new learners and transition planning that includes social and emotional needs.
- Personalised behaviour support plans and risk assessments where known patterns or vulnerabilities exist.
- Proportionate staff supervision in identified higher-risk locations/times and review of timetables, transport, breaks and community access where necessary.
- Staff training on SEND/SEMH, de-escalation, safeguarding, prejudice-based bullying, online harms and effective recording.
- Participation in suitable awareness activities, including Anti-Bullying Week, where these add value to the school's ongoing work.
- Use of CPOMS to identify patterns and evaluate whether interventions are working.

11. How bullying can be reported

A learner does not have to use the word "bullying" for staff to act. Staff should consider the behaviour described, the impact, repetition/pattern and any power imbalance.

- Tell any teacher, teaching assistant, key worker, mentor, Head of Centre, member of SLT, DSL or deputy DSL.
- Tell a parent/carer or another trusted adult who can contact the school.
- Use any agreed learner communication method, including writing, visuals, supported communication or a trusted adult speaking on their behalf.
- Report online evidence or concerns to staff without forwarding harmful content unnecessarily.
- Where there is immediate danger, serious violence or an emergency, staff will take immediate safety action and contact emergency services where required.

Anonymous information will be considered, but the school may have less ability to investigate where information cannot be clarified. Staff will nevertheless act on any identifiable safeguarding or safety risk.

12. Response and investigation procedure

Every case will be managed according to its seriousness, safeguarding threshold, age of those involved and individual needs. The sequence below is a framework rather than a rigid checklist.

Stage	Expected action
1. Immediate safety	Make the situation safe; provide first aid/emotional support if needed; preserve relevant evidence; prevent further contact where necessary.
2. Record and escalate	Record the report promptly on CPOMS. Inform a senior leader and the DSL immediately where there is a safeguarding concern.
3. Listen separately	Speak with those involved separately unless a joint discussion is clearly safe and appropriate. Allow communication support and avoid leading questions.
4. Assess	Consider whether the behaviour meets the bullying definition, whether there is a safeguarding/criminal issue, the power imbalance, repetition, impact, SEND, protected/prejudice factors and online reach.
5. Plan protection/support	Agree immediate and longer-term measures for safety, learning, emotional wellbeing and access to school. Avoid placing the burden of change on the learner who reported bullying wherever possible.
6. Parents/carers	Inform and involve parents/carers as appropriate, unless doing so would be unsafe, contrary to safeguarding advice, or inappropriate because of the learner's age/circumstances.
7. Action	Use education, support, behaviour consequences, supervision changes, restorative work (if voluntary/safe), risk assessments and external referrals as appropriate.
8. Review	Check with the learner(s) after an agreed period; confirm whether bullying has stopped; update support/risk plans and escalate if it continues.
9. Monitor pattern	Review links with previous incidents, locations, peer groups and online activity and consider wider curriculum/staffing action.

No forced mediation

Mediation or restorative meetings will not be used automatically. They require careful assessment, genuine consent and an absence of unacceptable risk or coercion. They are not an appropriate substitute for safeguarding action in cases such as sexual violence, serious harassment or abuse.

13. Support, consequences and restorative approaches

13.1 Support for the learner who has experienced bullying

- A named trusted adult and regular check-ins where helpful.
- Practical safety arrangements, supervision, changes to seating/grouping/routes or timetable where proportionate and not unduly burdensome to the learner affected.
- Access to mentoring, pastoral or therapeutic support where available and appropriate.
- Support to restore confidence, attendance, participation and learning.
- Advice about online safety, blocking/reporting and evidence preservation where relevant.
- Clear review points and an explanation of what the school can and cannot share about actions taken regarding another learner.

13.2 Support and accountability for the learner whose behaviour is bullying

The aim is to stop the behaviour, protect others and reduce the likelihood of recurrence. VTC will consider underlying needs without excusing harmful conduct.

- Clear explanation of the behaviour, its impact and the expected change.
- Consequences under the Behaviour Policy, proportionate to seriousness, repetition, intent, impact and individual circumstances.

- Individual behaviour support, mentoring, emotional regulation work, social communication support or therapeutic input where appropriate.
- Restorative reflection or reparation where safe, voluntary and suitable.
- Increased supervision, risk management or restricted access to particular technology/areas where necessary and proportionate.
- For serious/repeated cases, senior leadership review and consideration of placement/exclusion procedures in accordance with VTC's Behaviour and Exclusions policies.

13.3 Witnesses and the wider group

Bystanders can reinforce or reduce bullying. VTC will support witnesses to report safely, challenge group norms, address retaliation, and use wider group/class work where this can be done without identifying or embarrassing the learner who reported the concern.

14. SEND, SEMH and reasonable adjustments

VTC learners have significant SEND and SEMH needs. This requires skilled, individualised responses. It does not mean bullying should be normalised, dismissed or excused.

- Staff will consider communication, cognition, social understanding, trauma, anxiety, sensory needs, impulsivity and emotional regulation when interpreting behaviour and gathering information.
- A learner may need visual support, simplified questions, extra processing time, a trusted adult, alternative communication methods or a familiar environment to explain what has happened.
- Where a disabled learner is substantially disadvantaged by a school process, VTC will consider reasonable adjustments in accordance with the Equality Act 2010.
- Adjustments to process or consequence should not remove necessary protection for others. Safety and safeguarding remain paramount.
- Staff will distinguish, as far as possible, between disability-related behaviour, conflict and intentional/repeated bullying, while responding to the actual impact and risk.
- Individual EHC plans, behaviour plans, risk assessments and therapeutic recommendations will be considered and updated when incidents reveal new needs or triggers.

15. Recording, monitoring and evaluation

All reported bullying concerns and the school's response will be recorded in sufficient detail to show what was reported, how it was assessed, what action was taken, why decisions were made and what the outcome/review showed. Safeguarding records will comply with KCSIE and the Child Protection and Safeguarding Policy.

- Reports will be recorded on CPOMS in accordance with VTC procedures.
- Records should identify whether prejudice/discrimination, sexual behaviour, online activity, SEND vulnerability or another safeguarding factor is relevant.
- Serious or repeated incidents will be reviewed by SLT/DSL and linked to relevant risk assessments and support plans.
- The Headteacher/DSL will review anonymised bullying data at least termly for patterns in type, location, time, online/offline context, repeat involvement and protected/prejudice factors.
- The review will consider whether any group is disproportionately affected and whether curriculum, staffing, supervision, environment, training or policy changes are needed.
- The Proprietor/Advisory Board will receive proportionate anonymised assurance information and will challenge the effectiveness of implementation.

16. Bullying or harassment involving staff and other adults

VTC does not accept bullying, intimidation or harassment of staff, whether offline or online. The DfE published specific guidance on preventing and tackling bullying and harassment of school staff in

July 2026. This learner anti-bullying policy should therefore be read alongside VTC's staff, parent/carer and behaviour procedures.

- Where a learner bullies or harasses a member of staff, the matter will be managed under the Behaviour Policy and, where relevant, safeguarding and police procedures.
- Where a parent/carer or other adult bullies, threatens or harasses staff, the school will use its parent/carer expectations, complaints arrangements, site-safety procedures and other lawful measures as appropriate.
- Staff-to-staff bullying or harassment is managed through the Staff Code of Conduct, grievance/dignity-at-work, whistleblowing and/or disciplinary procedures rather than through the learner investigation process in this policy.
- Where conduct towards staff relates to a protected characteristic, VTC will consider its Equality Act and employer responsibilities.
- Any safeguarding concern about the behaviour of an adult working with children must be managed under the school's safeguarding allegations/low-level concerns procedures, not as an ordinary bullying complaint.

17. Complaints, escalation and external agencies

Parents/carers and learners are encouraged to raise concerns promptly so the school can act. A disagreement about whether behaviour meets the technical definition of bullying will not prevent VTC from addressing harmful behaviour.

- Concerns about an ongoing incident should first be raised with the relevant staff member, Head of Centre, Headteacher or DSL according to seriousness.
- If a parent/carer remains dissatisfied with the school's handling of the matter, they may use VTC's Complaints Policy. Safeguarding concerns should not be delayed while a complaint proceeds.
- VTC may contact children's social care, adult social care, police, health services, local authority teams or other agencies where thresholds or risk indicate this is appropriate.
- Where behaviour may be criminal, the school will consider police involvement and will follow safeguarding guidance rather than attempting to investigate criminal matters beyond what is appropriate for school safety and decision-making.
- Confidentiality will be respected, but information will be shared on a need-to-know basis where necessary to safeguard a learner, protect others or meet legal/regulatory duties.

18. Training, publication and review

- All staff will receive suitable induction and ongoing training so they can recognise, prevent, record and respond to bullying and know when to escalate to safeguarding.
- Training will include VTC-relevant themes such as SEMH, SEND, autism/communication differences, prejudice-based bullying, harmful sexual behaviour, online harms, de-escalation and restorative practice.
- Learners will be taught how to identify bullying, report concerns, support others safely and behave respectfully online and offline.
- Particulars of VTC's anti-bullying arrangements will be made available to parents and prospective parents in accordance with the Independent School Standards.
- This policy will be reviewed at least annually by the Headteacher with the Advisory Board and Proprietor, and sooner following significant incidents, inspection findings, changes in law/guidance or evidence that the strategy is not effective.
- The Proprietor retains ultimate responsibility for ensuring the anti-bullying strategy is effective in practice, not simply that a written document exists.

This policy will be reviewed by the Proprietor / Advisory Board as per the Policy and Procedures Review Schedule.

Appendix 1: VTC bullying response pathway

Step	Action
Report received	Listen, reassure, record the basic facts and identify any immediate safety needs.
Immediate risk?	If yes: make safe, seek first aid/emergency help, inform SLT/DSL immediately and preserve relevant evidence.
Safeguarding threshold?	If child-on-child abuse, sexual harm, serious violence, exploitation, significant harm, self-harm risk or other safeguarding concern is possible: follow safeguarding procedures without delay.
Assess bullying	Consider repetition/repeated effect, intent, impact and power imbalance. A single serious incident still requires action even if it does not meet the bullying definition.
Gather information	Speak separately, support communication needs, avoid leading questions and do not force face-to-face accounts.
Plan and act	Agree safety measures, parent involvement, support, consequences, education, risk assessment and external referrals as appropriate.
Review	Check that behaviour has stopped and that the learner feels safe; update plans and escalate if concerns continue.
Monitor pattern	Use CPOMS to identify repeat locations, groups, online issues or wider culture/training needs.

Appendix 2: Minimum recording requirements

The exact school form/system may change, but a bullying record should normally capture the following information so that VTC can evidence both the individual response and the effectiveness of its anti-bullying strategy.

Area	Record	Minimum detail
Report	Date/time/place/context	Who reported; who is involved; whether online/off-site; factual description; immediate safety concerns.
Classification	Bullying / other harmful behaviour	Whether bullying definition is met; type; repetition; power imbalance; protected/prejudice factor; sexual/online element.
Safeguarding	DSL decision	Whether safeguarding procedures were triggered; referrals/risk assessment; rationale and outcome.
Learner needs	SEND/SEMH/communication	Relevant EHC plan/support plan; communication adjustments; vulnerabilities; reasonable adjustments considered.
Action	Protection/support/consequences	Immediate safety measures; support for affected learner; action for learner displaying behaviour; parent contact; restorative work if appropriate.
Review	Follow-up date/outcome	Whether behaviour stopped; learner voice; further action; updated risk/support plans.
Pattern	Links to previous incidents	Repeat learners/groups/locations/times; online trends; wider curriculum/staffing/training action.

Key legislation and guidance referenced

- Education (Independent School Standards) Regulations 2014 (as amended), Schedule 1, including Part 3 paragraphs 7 and 10 and Part 6 information requirements.
- Department for Education, Independent School Standards guidance, April 2026.
- Department for Education, Keeping Children Safe in Education 2026, in force from 1 September 2026.
- Equality Act 2010 and Department for Education advice for schools.

- Department for Education, Preventing and tackling bullying: advice for headteachers, staff and governing bodies.
- Department for Education, Preventing and tackling the bullying and harassment of school staff, July 2026.
- Department for Education, Relationships Education, Relationships and Sex Education (RSE) and Health Education statutory guidance, revised guidance in force from 1 September 2026.