SPARKEN HILL
ACADEMY

Anti-Bullying Policy

Including prejudice-based and discriminatory bullying and online bullying

2026–27

Document Control

Approved by	Principal	Approval date	Review date
FP Committee	R.Lilley	Oct 2022	Sept 2023
FP Committee	R.Lilley	Oct 2023	Oct 2024
FGB	R.Lilley	Oct 2024	Oct 2025
FGB	R.Lilley	Dec 2025	Jan 2027
Trust Board	R.Lilley	08 Oct 2026	Sept 2027

Author	Mr R.Lilley, Principal and Designated Safeguarding Lead
Approved by	Trust Board, 08 October 2026
Next review	September 2027, or sooner if statutory guidance changes

What has changed in this version (October 2026)

- Updated to the final September 2026 Keeping Children Safe in Education 2026 and Working Together to Safeguard Children 2026. The revised RSHE statutory guidance is now in force.
- Prejudice-based and discriminatory bullying, including racism and faith-targeted abuse, is now explicitly treated as potential child-on-child abuse. It is recorded and responded to through both safeguarding and behaviour procedures, in line with the NCC/NSCP Interim Addendum and the Child-on-Child Abuse Policy.
- Misogyny and misandry, AI-generated images, and the updated online risks in KCSIE 2026 have been added.
- A new section explains that a finding of "not bullying" does not mean that nothing happened.
- Pupil reporting routes updated to match current practice: Worry Boxes in each corridor checked daily, QR posters in KS2, Year 6 Worry Ambassadors and the termly pupil voice survey.
- Support for children who are questioning their gender now follows KCSIE 2026 and the Child Protection Policy. Referrals to external organisations are agreed with the DSL and parents.
- The incident report form is revised so that it only asks for personal information that is needed, in line with UK GDPR.
- Governance terminology changed to the Trust Board, and the DSL team corrected.

Key Contacts

Principal and Designated Safeguarding Lead	Mr Richard Lilley
Anti-Bullying Coordinator	Mr Richard Lilley
Deputy DSL	Mrs Kate Phoenix, Vice Principal
Additional trained DSLs	Mrs Karen Gardiner, Senior Family Support Worker and Designated Mental Health Lead; Mrs Deb White, Safeguarding Officer
Trustee with responsibility for behaviour and anti-bullying	Mrs Clare Middleton (Safeguarding Trustee)
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1. Introduction and Ethos

At Sparken Hill Academy we aim to provide a supportive, caring and friendly environment in which all pupils can learn and thrive. We expect pupils to act safely and feel safe, in and outside school. We do not tolerate any form of bullying and we are committed to preventing and tackling it.

As children learn and grow together, they may fall out with their peers. We support pupils to resolve these "relational conflicts" and to stop them developing into bullying. If bullying does happen, pupils, parents, carers and staff should feel confident to report it, knowing that it will be dealt with promptly and effectively.

We encourage open discussion about difference, actively challenge prejudice and celebrate diversity. We take a contextual, trauma-informed and strengths-based approach to bullying and child-on-child abuse, and work with families and other agencies where appropriate.

2. Guidance and Legislation

This policy reflects:

- Keeping Children Safe in Education 2026 (final September 2026 version) and the NCC/NSCP Interim Addendum to the Model Child Protection Policy 2026/27;
- Working Together to Safeguard Children 2026;
- DfE Behaviour in Schools (2024), Preventing and Tackling Bullying (2017), and Mobile Phones in Schools (2024);
- Relationships Education, Relationships and Sex Education and Health Education statutory guidance (revised July 2025, in force from September 2026);
- DfE Generative AI: product safety expectations, and the DfE filtering and monitoring and cyber security standards for schools;
- the Education Act 2002 and the Education and Inspections Act 2006 (powers to regulate behaviour outside school);
- the Equality Act 2010, including the Public Sector Equality Duty;
- the Protection from Harassment Act 1997, the Malicious Communications Act 1988, the Communications Act 2003 and the Public Order Act 1986;
- the Online Safety Act 2023;
- the Children Act 1989 and 2004;
- UK GDPR, the Data Protection Act 2018 and the Data (Use and Access) Act 2025.

Bullying is not in itself a specific criminal offence, but some bullying behaviour, such as harassment, threats, assault, hate crime or the sharing of indecent images, may be. Where staff believe an offence may have been committed, the DSL will seek advice from the police.

This policy was developed in consultation with staff, parents and carers (through consultations and parents' meetings), pupils (through the school council, circle time and surveys) and Trustees. It is available on the Academy website (www.sparkenhillacademy.com/policy) and from the office. A child-friendly version is displayed in classrooms and included in welcome packs.

3. Roles and Responsibilities

All staff are aware that children can bully other children, in school, outside school and online, and understand their role in preventing and tackling it. In line with KCSIE 2026, all staff know the Relationships and Behaviour Regulation Policy, including its measures to prevent all forms of bullying, including cyberbullying and prejudice-based and discriminatory bullying.

Trust Board	Ensures this policy is effective and receives anonymised data on bullying and prejudice-based incidents through the termly safeguarding report. Mrs Clare Middleton is the Trustee with responsibility for behaviour and anti-bullying.
Principal	Has overall responsibility for anti-bullying, appoints the Anti-Bullying Coordinator, and liaises with the Trust Board, parents and carers, the Local Authority and other agencies.
Anti-Bullying Coordinator	Develops and reviews the policy; monitors its implementation and effectiveness; manages the reporting and recording of incidents; and coordinates training and support for staff, parents and carers.
DSL team	Responds to any bullying that raises safeguarding concerns, including prejudice-based or discriminatory harm, sexual bullying and online abuse, under the Child Protection and Child-on-Child Abuse Policies.

4. What Is Bullying?

We use the Anti-Bullying Alliance definition:

> *"Bullying is the repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power. It can happen face to face or online."*

With younger pupils we use the phrase "Several Times On Purpose", and teach that bullying can stop when we "Start Telling Other People".

Bullying is often motivated by prejudice against particular groups, for example on grounds of race, religion or belief, sex, sexual orientation, gender reassignment, SEND or disability (including autism), or because a child is adopted, in care, a young carer, or from a particular background or family. It can be motivated by actual or perceived differences.

Relational conflict

Some incidents between pupils are not bullying but still need support from trusted adults. Relational conflict is usually between children of similar power or status, happens occasionally or by accident, and is usually followed by remorse and a willingness to put things right. We will address every incident, support the children involved, and monitor to make sure a conflict does not escalate into bullying.

When the bullying threshold is not met

In deciding whether behaviour is bullying, we consider the evidence as a whole, including whether there is repetitive, intentional hurting and an imbalance of power. A finding that behaviour is not bullying does not mean that nothing happened, or that no support or consequence is needed. Serious one-off incidents, discriminatory behaviour and child-on-child abuse will always be taken seriously and responded to, whether or not the bullying threshold is met.

5. What Bullying Can Look Like

- **Physical:** pushing, poking, kicking, hitting, biting, pinching or damaging belongings.
- **Verbal:** name-calling, sarcasm, spreading rumours, threats, teasing or belittling.
- **Emotional or relational:** isolating or excluding others, tormenting, hiding belongings, threatening gestures, ridicule, humiliation, intimidation, manipulation or coercion.
- **Prejudice-based and discriminatory:** derogatory or discriminatory language or behaviour that is racist, faith-targeted (including antisemitic or anti-Muslim), sexist, misogynistic or misandrist, homophobic, biphobic, transphobic or disablist, or that targets any other characteristic.
- **Sexual:** unwanted physical contact, inappropriate touching, sexual comments or name-calling, or showing others sexual images or content. Sexual behaviour between children is always responded to under the Child-on-Child Abuse Policy.
- **Online (cyberbullying):** see Section 6.
- **Indirect:** exploitation, including "false friendships", and criminal or sexual exploitation or radicalisation, which are responded to under the Child Protection and Prevent policies.

There is no hierarchy of bullying. All forms are taken equally seriously.

6. Online Bullying and Online Harms

Online bullying takes place through social media, messaging apps, gaming platforms and websites. It can happen at any time and can follow a child into their home. It includes:

- sending offensive, upsetting or threatening messages;
- sharing private images or videos without consent;
- creating fake profiles or impersonating someone to cause harm;
- deliberately excluding someone from an online group, or encouraging others to join in ("pile-ons");
- using AI tools or "deepfake" technology to create false images, videos or audio of another person;
- spreading misinformation or disinformation about someone.

Any incident involving nude or semi-nude images, including AI-generated or altered images, receives a safeguarding response under the Child-on-Child Abuse Policy, whether or not the image was shared consensually. Staff must not view, copy or forward such images, and must report the incident to a DSL immediately.

7. Prejudice-Based and Discriminatory Bullying

Children may experience prejudice-based harm, including racism, faith-based prejudice and other discrimination, which can affect their wellbeing, mental health, sense of safety and willingness to seek help. Under the final September 2026 KCSIE, discriminatory behaviour, including racism and faith-targeted abuse, is recognised as a potential form of child-on-child abuse. Such incidents will therefore not be treated solely as behaviour or equality matters. They will be:

- recorded on CPOMS as a prejudice-based or discriminatory incident, in addition to any behaviour record;
- considered by a DSL alongside other information about the children involved;
- responded to through both safeguarding and behaviour procedures; and
- reviewed termly to identify patterns, which are reported, anonymised, to the Trust Board.

8. Where Bullying Takes Place

Bullying is not confined to the school premises. It can happen outside school, on the journey to and from school, in the community and online. Where bullying outside school affects pupils or the orderly running of the Academy, we will respond in line with the Relationships and Behaviour Regulation Policy, and offer support to the children and families involved.

9. How to Report Bullying

Pupils, including bystanders

Pupils can tell any adult in school, including their class teacher, a TA, a lunchtime supervisor, the office team, the Community Team or the Principal. They can also:

- post a note or drawing in a Worry Box in any corridor. The boxes are checked every day by the Community Team and followed up in person by a DSL;
- in Key Stage 2, scan a QR code poster with their iPad to report a worry;
- ask a Year 6 Worry Ambassador to take them to a trusted adult;
- share their views in the termly pupil voice survey.

The adult will listen, reassure the pupil, and record the concern on CPOMS. A DSL is alerted immediately if the report is urgent or a child may be at risk.

Parents and carers

Parents and carers should contact their child's class teacher in the first instance, in person, by phone, by email or through Dojo. The concern will be recorded on CPOMS. We ask parents to come directly to the Academy rather than raising concerns on social media, and to understand that we may not be able to share information about other children.

Staff and visitors

Staff act on concerns immediately and report them to the Anti-Bullying Coordinator or a DSL, recording them on CPOMS. Visitors report concerns to a DSL, the Principal or a senior leader before they leave the site.

10. How We Respond

All reports are taken seriously and investigated, and each incident is considered in its context. Our response may include:

- talking to all the children involved: the child who has been targeted, the child or children alleged to have bullied, and any bystanders;
- informing and involving the parents or carers of each child;
- consequences in line with the Relationships and Behaviour Regulation Policy, which are fair, proportionate and take account of age, development and SEND;
- restorative work, solution-focused meetings, and individual or group work;

- support for the targeted child, such as a trusted adult, check-ins, ELSA or other Community Team support, and a safety plan where needed;
- support for the child who has bullied to understand and change their behaviour, and consideration of any unmet needs;
- referral to a DSL where there are safeguarding concerns, which may lead to a referral to Nottinghamshire MASH or an Early Help or Family Help assessment in line with the Nottinghamshire Pathway to Provision;
- contacting the police where a crime may have been committed;
- keeping the person who reported the bullying informed of the actions taken, and monitoring to check the bullying has stopped.

Records on CPOMS are used to identify trends and inform preventative work, and are reviewed regularly by the Anti-Bullying Coordinator and the DSL team.

11. Pupils Who May Be More Vulnerable

Some pupils may be more vulnerable to bullying and its impact, including children:

- with SEND, including autism;
- who are looked after, previously looked after, in kinship care or who have a social worker;
- who are adopted or are young carers;
- who are learning English as an additional language, or who are from minority ethnic or faith groups;
- who are, or are perceived to be, lesbian, gay or bisexual, or who are questioning their gender;
- experiencing difficulties at home.

We take particular care to consider the needs and circumstances of these pupils when investigating and responding. Support for children who are questioning their gender follows KCSIE 2026 and Section F of the Child Protection Policy. It involves parents and carers unless there is a safeguarding reason not to. Any referral to an external organisation is agreed with the DSL and parents.

12. Preventing Bullying

- An active school council with representatives from each Key Stage 2 year group.
- Year 6 Worry Ambassadors, and play leaders and peer mentors.
- Anti-Bullying Week (November) and Safer Internet Day (February) each year, and themed days that promote equality and tackle prejudice.
- An RSHE curriculum, aligned with the revised statutory guidance in force from September 2026, that teaches respectful relationships, stereotyping, prejudice, equality, types of bullying including online bullying, the impact of bullying, and how to get help.
- Age-appropriate teaching about online safety, including generative AI, deepfakes, misinformation, disinformation and conspiracy theories, and misogynistic online content.
- Inclusive displays, books and resources that celebrate diversity.
- Community Team support, including Positive Play, ELSA, Lego therapy and play therapy for identified pupils.
- Pupil mobile phones are handed to the class teacher at the start of the day and returned at the end.
- Information for parents through the website, Dojo, parent events and the parent information board.
- Regular training for all staff, including lunchtime supervisors and breakfast and after-school club staff, on bullying, online safety, AI risks, racism and other prejudice, and inclusion.

- All staff modelling respectful behaviour and challenging prejudiced language immediately.

Filtering and monitoring

The Academy uses Smoothwall filtering and monitoring, with alerts RAG-rated to the Principal. The provision is reviewed at least annually against the DfE standards, with the involvement of the Data Protection Officer, who also advises on AI risk and Data Protection Impact Assessments. It addresses the four areas of online risk:

- **Content:** illegal, inappropriate or harmful material, including pornography, material featuring extreme sexual or physical violence, racism, misogyny, self-harm, suicide, radicalisation, misinformation, disinformation and conspiracy theories.
- **Contact:** harmful interaction with others, including grooming and exploitation, and harmful interactions with generative AI applications such as chatbots.
- **Conduct:** behaviour that increases the likelihood of harm, such as online bullying or making and sharing images.
- **Commerce:** risks such as online gambling, scams and inappropriate advertising.

13. Complaints

Parents and carers who are not satisfied with the Academy's response should follow the Complaints Policy, available on the website and from the office.

14. Links with Other Policies

Policy	How it links
Child-on-Child Abuse Policy	Prejudice-based and discriminatory harm, sexual bullying, nudes and AI-generated images
Relationships and Behaviour Regulation Policy	Rewards, consequences and behaviour outside school
Child Protection Policy 2026–27	Safeguarding procedures and support for children questioning their gender
Online Safety Policy	Online behaviour, filtering and monitoring, and generative AI
Equality Policy	Tackling prejudice and the Public Sector Equality Duty
RSHE / PSHE Policy	Preventative curriculum
Prevent Duty Policy	Extremist or hateful views and radicalisation
Suspensions and Permanent Exclusion Policy	Serious or persistent bullying
Complaints Policy	Raising concerns about the Academy's response
Data Protection Policy	Recording and sharing information, and CCTV

15. Monitoring and Review

The Anti-Bullying Coordinator and DSL team monitor the effectiveness of this policy through CPOMS data (including patterns by type, year group, location and characteristic targeted), the termly pupil voice survey, staff training records, and the annual review of filtering and monitoring and the online safety curriculum. The termly safeguarding report to the Trust Board includes anonymised bullying and prejudice-based incident data.

This policy is reviewed annually and updated to reflect changes to statutory guidance, legislation and best practice. The next review is due in September 2027.

Appendix A: Bullying and Prejudice-Based Incident Report Form

Record the incident on CPOMS. This form can be used where it is quicker to write the report first. Record only the personal information needed to respond to the incident. Where an incident is prejudice-based, record the characteristic that was targeted, rather than the personal characteristics of every child.

Type of report	☐ Bullying ☐ Prejudice-based / discriminatory incident ☐ Relational conflict (monitor)
Date and time of incident	
Reported by (name and role)	
Where it happened	☐ Classroom ☐ Playground ☐ Dining hall ☐ Toilets ☐ Corridor ☐ To/from school ☐ Outside school ☐ Online ☐ Other

Children involved

Name	Class	Role (targeted / alleged to have bullied / witness)

Is the targeted child safe, including travelling to and from school?	
Has this happened to them before? Is this a repeat by the same child(ren)?	
If prejudice-based, characteristic targeted	☐ Race or ethnicity ☐ Religion or belief ☐ Disability or SEND ☐ Sex (including misogyny/misandry) ☐ Sexual orientation ☐ Gender reassignment ☐ Other
Type of behaviour	☐ Physical ☐ Verbal ☐ Emotional/relational ☐ Sexual ☐ Online ☐ Threats
Description of the incident	
Action taken to support the targeted child	
Action taken with the child(ren) who bullied (consequence, education, support)	
Parents and carers of all children informed?	Yes ☐ No ☐ (reason)
DSL informed? Safeguarding action needed?	
Reported to the police?	Yes ☐ No ☐
Review date and outcome	
Recorded on CPOMS by / date	