



Anti-Bullying & Cyberbullying Policy

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Description: This policy outlines the School's approach to combating bullying and cyberbullying.

OUR SCHOOL AIMS

- ❖ *To be a safe and trusted foundation for our pupils to achieve their individual academic, social and creative potential.*
- ❖ *To cultivate the skills, knowledge, self-awareness and academic credentials our pupils will need to confidently meet the challenges of our rapidly changing world.*
- ❖ *To instil and nurture a strong sense of social responsibility, integrity and environmental awareness so our pupils positively contribute to a sustainable and just society.*
- ❖ *To guide each pupil in the discovery, delight and development of their individual gifts, talents and character.*
- ❖ *To create and sustain an inclusive and contemporary school culture, where diversity, difference and individuality are recognised and celebrated.*
- ❖ *To prioritise physical and emotional wellbeing across every facet of our school community.*

1.0 INTRODUCTION

- 1.1 Lingfield College, incorporating Lingfield College Nursery, Lingfield College Prep and Lingfield College Sixth Form (Lingfield College) is committed to providing a caring, friendly and safe environment for all our pupils so that they can learn in a relaxed and secure atmosphere. Bullying of any kind is unacceptable at our school and completely out of keeping with the school's ethos and aims. Bullying affects the whole school community: pupils, their families, teachers, support staff and governors. By raising awareness and working together we can hope to deal with bullying effectively and send a clear message to all concerned that bullying of any kind will not be tolerated at the school. Unintentional, careless or reckless behaviour can also constitute bullying when it has the same result as intentional actions.
- 1.2 The school is aware that technology is advancing all the time, and that one of the uses that students might make of instant internet access and having cameras in mobile phones is to bully people online.



Cyberbullying typically involves social networking sites such as, Instagram, Snapchat & TikTok, and can also include video sharing apps. Question asking games are of particular concern.

- 1.3 Pupils with special educational needs or disabilities are often at greater risk of being bullied than other pupils on the basis of their condition.
- 1.4 For more detailed information about the school's approach to Cyberbullying, please see sections 18-21 of this Policy.
- 1.5 In line with the peer led school-wide 'Lingfield Bystanders' work, we refer to a 'target', rather than a 'victim', of bullying throughout this policy.

2.0 AIMS

- 2.1 The School aims to produce a safe and secure environment where everyone can learn and work without anxiety, and where measures are in place to reduce the likelihood of bullying.
- 2.2 This policy supports our school aim to develop self-worth in every student by helping children to stay safe, be healthy and take responsibility for their actions in person and online to ensure that all can enjoy and achieve their learning. This is underpinned by the principles that:
 - Everyone in the school takes responsibility for combating bullying
 - Targets of bullying feel protected and supported
 - Those engaged in bullying are encouraged to change their behaviour and their attitudes about bullying
 - The bully will offer an apology and other appropriate consequences may take place
 - If possible, the pupils will be reconciled through supportive meetings with tutors and/or Heads of Year.

3.0 OBJECTIVES

- 3.1 To have in place a safeguarding and child protection policy and related policies that outline clear procedures to ensure that we meet our responsibilities for safeguarding and promoting the welfare of all children.
- 3.2 All Governors, teachers, non-teaching staff, parents and pupils have an understanding of what bullying is.
- 3.3 All Governors, teaching and non-teaching staff will know what the school policy is on bullying and follow it when bullying is reported.
- 3.4 To protect pupils from bullying as part of our responsibility to provide a safe, secure, caring and friendly school environment for all children
- 3.5 To develop confident children who will notify staff of any incident of bullying
- 3.6 To have in place established systems that will deal with incidents of bullying
- 3.7 As a school we take bullying seriously: pupils and parents should be assured that they will be supported when bullying is reported.
- 3.8 All staff, pupils and parents should know that bullying is unacceptable and will not be tolerated.
- 3.9 The key message will always be prevention: by teaching pupils that everyone in our school has the right to feel safe and happy, and that bullying of any kind will not be tolerated.



4.0 WHAT IS BULLYING?

- 4.1 Bullying can be defined as the intentional hurting, harming or humiliating of another person by physical (including sexual), verbal and emotional means (excluding, tormenting or spreading malicious rumours. It can be done subtly or in an overt and intimidatory way. It may occur directly or via cyber-technology (social media, mobile phones, texts, photographs and emails). It can also involve manipulating a third party to tease or torment someone or can involve complicity that falls short of direct participation.
- 4.2 Bullying may involve actions or comments that are racist, sexual /sexist, homophobic, or mock someone for their religion, cultural background, special educational needs, disability, or particular aspects of someone's appearance, such as hair colour, glasses, acne or body shape. It can happen anywhere and at any time, as a one-off action or repeated actions, and can involve anyone in the school. One person or a group can bully others. It is not confined solely to relationships between young people. Verbal and emotional bullying in particular may occur between staff or between staff and parents. All members of the school community have a responsibility to prevent such occurrences of bullying from taking place.
- 4.3 The DfE document 'Preventing and Tackling Bullying' (July 2017), indicates that the problems caused by bullying constitute a Safeguarding risk:

When there is 'reasonable' cause to suspect that a child is suffering, or is likely to suffer, significant harm, a bullying incident should be addressed as a child protection concern under the Children Act 1989

'Preventing and Tackling Bullying' (July 2017)

- 4.4 If two children do not like each other or just do not get on and are of equal power or strength, it does not mean that bullying has occurred – they may simply have had a disagreement that has escalated.
- 4.5 The DSL keeps a record of known bullying incidents and discusses them on a termly basis with the Safeguarding Governor.
- 4.6 All staff are aware that children with SEND and/or differences/perceived differences are more susceptible to being bullied/targets of child abuse.



5.0 CHILD-ON-CHILD ABUSE

- 5.1 Child-on-Child Abuse refers to a range of types of abuse perpetrated by a child on another child. This can include (but is not limited to):
- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
 - abuse within intimate partner relationships
 - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
 - sexual violence and sexual harassment
 - consensual and non-consensual sharing of nudes and semi-nude images and/or videos
 - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
 - upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the target humiliation, distress or alarm.
 - Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)
- 5.2 The school recognises the gendered nature of child-on-child abuse (i.e., that it is more likely that girls will be targets and boys' perpetrators), but that all peer-on-peer abuse is unacceptable and will be taken seriously.
- 5.3 The school recognises that pupils with SEND are more vulnerable to being targets of child-on-child abuse.
- 5.4 In the event of disclosures about child-on-child abuse, all the children involved, regardless of their role in the abuse, are treated as being 'at risk'.
- 5.5 All potential allegations of child-on-child abuse should be reported to the Deputy Head Pastoral (Senior School) or the Head of the Prep School who will conduct a full investigation which will involve interviewing all children/staff involved, recording their accounts, and writing a report which will be recorded on CPOMS and the Central Incident Log.
- 5.6 Each case will be approached on an individual basis and the outcome determined by the severity of the case.
- 5.7 Irrespective of the seriousness parents of all parties will be notified and involved.
- 5.8 Any serious or criminal allegation should be referred to local agencies and the Police. It is also the case that a bullying incident may be treated as a child protection incident where there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. In these situations, the DSL should be informed at the earliest possible opportunity.
- 5.9 If an act appears to have been inappropriate, there will be a need for some form of behaviour management or intervention: The School's Behaviour Management Policy includes the following points: 'Students found engaged in any form of intimate sexual activity must expect to face possible exclusion from the School. Public and private displays of affection are not allowed'.



6.0 CHILD-ON-CHILD SEXUAL ABUSE

- 6.1 Sexual violence and sexual harassment can occur between two children of any age and sex from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. As set out in Part one of Keeping children safe in education (KCSIE 2024), all staff are advised to maintain an attitude of 'it could happen here'.
- 6.2 Staff should be aware of and act appropriately to all reports and concerns including those outside school and online.
- 6.3 Staff must make it clear that there is a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable, and it will not be tolerated, and it should never be passed off as "banter", "just having a laugh", "part of growing up" or "boys being boys". Challenging physical behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them; all concerns must be acted on.
- 6.4 Not recognising, acknowledging, or understanding the scale of harassment and abuse and/or downplaying some behaviours related to abuse as it can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. Staff must always act on abuse that they witness or is reported to them.
- 6.5 Staff should understand that all the above can be driven by wider societal factors beyond the school, such as everyday sexist stereotypes and everyday sexist language.
- 6.6 Children with Special Educational Needs and Disabilities (SEND) are three times more likely to be abused than their peers. Additional barriers can sometimes exist when recognising abuse in SEND children. These can include:
 - assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
 - the potential for children with SEND being disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs; and
 - communication barriers and difficulties overcoming these barriers.
- 6.7 Any reports of abuse involving children with SEND will therefore require close liaison with the DSL (or deputy) and the special educational needs co-ordinators (SENCOs)
- 6.8 Children who are lesbian, gay, bi, or trans (LGBT+) can be targeted by their peers. In some cases, a child who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT+.
- 6.9 Abusive sexual activity includes any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.
- 6.10 Responding to reports of sexual violence or harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Ultimately any decisions will be made on a case-by-case basis, and if there is cause to believe that a child is at risk of serious harm, then any such abuse will involve taking advice from external agencies such as Children's Services and the Police. The DSL will take a leading role in all cases and another member of staff will be present when the children involved are interviewed.
- 6.11 When responding to a report of child sexual violence, it is essential that all targets are reassured that they are being taken seriously and that they will be supported and kept safe. A target should never



be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a target ever be made to feel ashamed for making a report.

- 6.12 The starting point of any report will always be that sexual violence and harassment is unacceptable and will not be tolerated at the school. It is crucial that staff do not pass off allegations of sexual violence as 'banter', 'part of growing up' or 'having a laugh'.
- 6.13 Further example of Sexual Harassment can include:
- Sexual comments, jokes, stories; lewd comments; remarks about clothes & appearance; sexualised name-calling
 - Sexual 'jokes' and taunting
 - Physical behaviour such as deliberately brushing against someone or interfering with their clothes
 - Displaying images of a sexual nature
 - Online sexual harassment, such as sharing sexual images and videos; sexualised online bullying; unwanted sexual comments including on social media
 - Sexual exploitation: coercion and threats
- 6.14 The DSL will need to make an immediate risk and needs assessment, working on a case-by-case basis to consider the needs of both the target(s) and the alleged perpetrator(s) as well as the other students and staff (where appropriate) and will decide on the measures to put in place to support all parties. This assessment will be kept under review. The wishes of the target will be carefully



considered in terms of how they wish to proceed, and all staff should act in the best interests of the child.

- 6.15 In order to more fully determine the nature of the incident, the following factors should be given consideration:
- **Equality:** consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies
 - **Coercion:** the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of target resistance.
 - **Consent:** agreement including all the following:
 - Understanding that is proposed based on age, maturity, development level, functioning and experience
 - Knowledge of society's standards for what is being proposed
 - Awareness of potential consequences and alternatives
 - Assumption that agreements or disagreements will be respected equally
 - Voluntary decision
 - Mental competence
- 6.16 Depending on the individual case, it may be managed in a range of ways as detailed in Part 5 of Keeping Children Safe in Education 2024
- Managed internally
 - Early Help
 - Referral to Children's Social Care
 - Report to Police
- 6.17 The School will not wait for either the start or the outcome of a police investigation before acting to protect the target, alleged perpetrator and other children at the school.
- 6.18 The alleged perpetrator should be removed from any classes that they share with the target, and part of the DSL's risk assessment should include arrangements for keeping the target and alleged perpetrator apart on school premises and transport (where relevant). These actions are in the best interests of both children and should not be perceived to be a judgement on the guilt of the alleged perpetrator.
- 6.19 The DSL and the senior team working on the case will bear in mind that the target may not disclose the whole picture immediately but may instead be more comfortable providing information piecemeal. Because of this, it is essential to maintain good communication throughout the process and to provide ongoing support. A trusted adult of the target's choosing (such as their Head of Year) will be allocated to them to talk about their needs.
- 6.20 A target of sexual violence is likely to be traumatised and may struggle in a normal classroom environment. Where appropriate, the school can provide individual counselling and/or a reduced timetable if the target finds it difficult to attend school full-time; the school will to everything reasonably possible to support the target, particularly in the case of repercussions from making the



disclosure. If the target decides to move to another school, the DSL will inform the new setting of the situation so that appropriate support can be put in place before his/her arrival.

- 6.21 In terms of supporting the alleged perpetrator, their age and developmental stage will be considered when deciding on a particular strategy, together with the risk they pose to the target and other pupils at the school.
- 6.22 Any child is likely to experience stress as a result of being the subject of allegations and/or negative reactions by peers; harmful sexual behaviour in children may be a symptom of either their own abuse or exposure to abusive practices or materials. Advice will be taken as appropriate from Children's Services, specialist sexual violence services and the Police.
- 6.23 If the alleged perpetrator moves to another school, the DSL will tell her counterpart at the new setting about ongoing support needs and, where appropriate, potential risks to other children and staff
- 6.24 When there has been a report of sexual violence, the DSL (or a deputy) will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment will consider:
- the target, especially their protection and support;
 - whether there may have been other targets,
 - the alleged perpetrator(s); and
 - all the other children, (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.
- 6.25 Risk assessments will be recorded (written or electronic) and kept under review. At all times, we will be actively considering the risks posed to all our pupils and put adequate measures in place to protect them and keep them safe.
- 6.26 The DSL (or a deputy) will ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. The school risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments will be used to inform the school's approach to supporting and protecting our pupils and updating our own risk assessment.
- 6.27 Further details on managing cases of child sexual violence and harassment can be found in the DfE document Sexual Violence and Sexual Harassment between Children in Schools and Colleges. Information and advice is also available in the Sussex document Working with Sexually Active Young People. Assessment, Consultation and Therapy (ACT). The ACT Team can also assist professionals in identifying sexual behaviour of concern in children and adolescents, contact act@surreycc.gov.uk or call 01483 519606.

7.0 SEXUAL VIOLENCE

- 7.1 We are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way and that it can happen both inside and outside of school. When referring to sexual violence



in this policy, we do so in the context of child-on-child sexual violence. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

7.2 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.

7.3 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.

7.4 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. (We are aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

7.5 Causing someone to engage in sexual activity without consent

A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

7.6 Definition of Consent

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he/they agree by choice to that penetration and has the freedom and capacity to make that choice. Further information about consent can be found here: [Advice about consent from Rape Crisis](#)

7.7 Sexual consent

- Under English and Welsh law, children and young people under the age of 13 are seen as being less capable of consenting than those aged 13 and over
- the age of consent is 16;
- sexual intercourse without consent is rape.

8.0 SEXUAL HARRASSMENT

8.1 When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. 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.

8.2 Whilst not intended to be an exhaustive list, 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: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the target) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - consensual and non-consensual sharing of nude and semi-nude images and videos. Taking and sharing nude photographs of under 18s is a criminal offence. More information is available here: [Advice for Education Settings](#)
 - sharing of unwanted explicit content;
 - upskirting (is a criminal offence);
 - sexualised online bullying;
 - unwanted sexual comments and messages, including, on social media;
 - sexual exploitation; coercion and threats.

8.2 It is vital that staff consider sexual harassment in broad terms. Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

9.0 HARMFUL SEXUAL BEHAVIOUR

- 9.1 Children’s sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage.
- 9.2 A useful umbrella term is “harmful sexual behaviour” (HSB). The term has been widely adopted in child protection and is used in this policy. HSB can occur online and/or face to face and can also occur simultaneously between the two. HSB should be considered in a child protection context.
- 9.3 When considering HSB, ages and the stages of development of the children are critical factors. 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 or if one of the children is pre-pubescent and the other is not. 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 DSL will seek specialist support in cases of HSB.



10.0 SERIOUS VIOLENCE

- 10.1 All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime.
- 10.2 These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.
- 10.3 Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.
- 10.4 All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

11.0 RACIST INCIDENTS

- 11.1 The School policy on racist incidents is set out in both the Equality, Diversity and Inclusion Policy and the Behaviour Policy, and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures.
- 11.2 The DSL keeps a record of racist incidents and discusses them on a termly basis with the Safeguarding Governor and the Chair of Governors.

12.0 THE POTENTIAL SERIOUSNESS OF BULLYING

- 12.1 Bullying is not a specific criminal offence, although there are criminal laws which apply to harassment and threatening behaviour, but the consequences of bullying on the bullied should in no way be underestimated or minimised. Bullying causes a wide range of emotional effects, from lack of confidence to psychological damage, and potentially to suicide.
- 12.2 Under the section entitled 'Criminal Law' in the DfE 'Guidance on Preventing and Tackling Bullying' details are given about the potential implications of serious incidents of bullying:

'Although bullying in itself is not a specific criminal offence in the UK, it is important to bear in mind that some types of harassing or threatening behaviour – or communications – could be a criminal offence, for example under the Protection from Harassment Act 1997, the Malicious Communications Act 1988, the Communications Act 2003, and the Public Order Act 1986.

If school staff feel that an offence may have been committed they should seek assistance from the police. For example, under the Malicious Communications Act 1988. Any person who sends an electronic communication which conveys a message which is indecent or grossly offensive, a threat, or information which is false and known or believed to be false by the sender, is guilty of offence if their purpose in sending it was to cause distress or anxiety to the recipient.

'Preventing and Tackling Bullying' (July 2017)



13.0 RECOGNISING THE SIGNS OF BULLYING

13.1 Changes in behaviour *may* indicate that a pupil is being bullied:

- A reluctance to attend school & erratic patterns of attendance or lateness
- Frequent visits to the Medical Room with symptoms such as stomach pains or headaches
- Becoming very anxious, quiet & withdrawn
- Loss of confidence

- Handing in work that has been copied or damaged by others
- Property (e.g., bags, sports kit, pencil cases) suddenly go missing or are damaged
- Loss of interest in activities, sports or hobbies that they had previously found enjoyable
- Unexplained cuts and bruises
- Difficulty in sleeping at night
- Talking of suicide or running away



13.2 Characteristics of Sexual Bullying:

- Comments about appearance & attractiveness
- Cyberbullying
- Upskirting
- Sexting
- Sending pornographic material
- Graffiti with sexual content
- Sexual innuendoes or propositions
- Abusive name-calling
- At its worst, sexual assault or rape

13.3 Characteristics of Homophobia:

Generally homophobic bullying is like any other sort of bullying, but may include

- Verbal abuse
- Spreading rumours about a student's sexuality
- Physical abuse, including threatening behavior, hitting, punching, kicking and sexual assault
- Cyberbullying – using the internet to spread rumours about someone or exclude them

13.4 Characteristics of Racism:

- Verbal abuse – name calling, racist jokes, offensive mimicry
- Physical threats or attacks
- Bringing racist leaflets, magazines or documents into school
- Inciting others to behave in a racist way
- Racist graffiti or written insults



14.0 CHILD-ON-CHILD ABUSE: HOW ALL INVOLVED PARTIES WILL BE SUPPORTED

- 14.1 Both the target, alleged perpetrator and any other children affected will be supported by a designated member of staff. Their role is to regularly check in on the child and review their wellbeing. They will also liaise with parents to monitor how they are coping in school and at home.
- 14.2 In the Senior School the target, alleged perpetrator and any other child affected will be offered specialist support from the welfare officer or school counsellor or an outside agency.
- 14.3 The target will always be given the option of moving classes/ form group/teaching group away from the perpetrator. We will also consider where and when they will come across each other out of lesson time and have a plan to minimise any contact.
- 14.4 In the Senior School the Head of Year will monitor the situation carefully and report this to the DSL.
- 14.5 In the Prep School pupils will be offered support by their Class Teacher, Head of Key Stage and Head of Prep School where appropriate. They will also monitor the situation and also work with the families if necessary.

15.0 PROCEDURE IF BULLYING IS SUSPECTED

- 15.1 If staff are concerned about an incident, no matter how minor it may appear, they are encouraged to discuss it with the relevant Tutor, Head of Year and Deputy Head (Pastoral) in Lingfield College or a Class Teacher, Key Stage Leader, or the Head at Lingfield College Prep and log the concern on our Safeguarding software CPOMS.
- 15.2 Stopping violence and ensuring immediate physical safety is obviously the school's first priority, but emotional bullying can be more damaging than physical; teachers have to make their own judgements about each specific case.
- 15.3 Children should consult whoever they feel comfortable with, e.g. a trusted adult or responsible pupil.
- 15.4 Friends of the targets should be encouraged to come forward if necessary. If they act in good faith, these friends will always be supported.
- 15.5 Heads of Year or Form teachers in Lingfield College / Class teachers, Key Stage Leaders in Lingfield College Prep may consider running assemblies or PSHE sessions on anti-bullying, focusing on how to support friends if an incident arises.
- 15.6 In the first instance parents should consult the Class Teacher, Key Stage Leader, Head of Lingfield College Prep, Form Tutor or Head of Year if they have any concerns about an incident of bullying.



16.0 PROCEDURE IF BULLYING IS SUSPECTED WITHIN THE FOUNDATION STAGE

- 16.1 If a parent or a member of staff has a bullying concern within the Foundation Stage (FS) they will be asked to speak to the child/children's Class Teacher first.
- 16.2 The Class Teacher will record this information and inform the FS Leader and the whole team.
- 16.3 The child/children will be watched very closely for a short period of time.
- 16.4 The Class Teacher will then arrange a meeting with the parent who had the initial concern. During the meeting the Class Teacher will report to the parent about the outcomes they have concluded from a range of observations. A plan of action will then be put in place.
- 16.5 Parents of all the children that are concerned will be informed about the situation and will also be made aware of the actions that will be put in place.

17.0 DEALING WITH A REPORT OF BULLYING

- 17.1 The member of staff or senior pupil should reassure the pupils involved and will inform the appropriate pastoral staff, such as Deputy Head (Pastoral), Head of Year or Tutor in Lingfield College, or Class Teacher, Key Stage Leader or Head of Lingfield College Prep. The incident must also be logged on CPOMS. However, in cases where a child is at risk it may be appropriate to refer to the Designated Safeguarding Lead (DSL) immediately.
- 17.2 The target must be given the time and opportunity to speak and will be asked to write down their account of events where possible.
- 17.3 Any witnesses will be interviewed and if possible asked to write their own views on what happened.
- 17.4 The perpetrator should be interviewed individually and asked to write down or describe their version of events. This is dependent on age and maturity.
- 17.5 In each set of interviews, the staff should record the incident precisely. Individual records must be based on fact and not include speculation or hearsay unless they can be verified.
- 17.6 The evidence collected should be discussed with the relevant members of the Pastoral Team and Senior Staff, including the Headmaster, after which an appropriate sanction will be given (please see Behaviour Management Policy).
- 17.7 In serious cases, suspension or even expulsion may be considered.
- 17.8 The meeting should conclude with an agreement on how the pupil is going to behave towards the target and others generally. Both the perpetrator and the target may be advised to see the Lingfield College Counsellor or may be directed to other forms of support where needed. Strategies may be discussed to consider ways in which both parties can receive help.
- 17.9 An apology should be obtained from the bully to the target where appropriate for some degree of closure.
- 17.10 The Head of Lingfield College Prep and Lingfield College Deputy Head (Pastoral) each keep a record of bullying incidents for the purpose of spotting trends, identifying problems and monitoring them. Any incidents of bullying are recorded on the Central Incident Log/CPOMS and added to



iSAMS. The logs are shared with the Safeguarding Governor on a termly basis, and care is taken to monitor the data for particular patterns of behaviour or repeated offences.

- 17.11 Parents should be informed of serious cases of bullying and may be asked to come to a meeting to discuss the problem.
- 17.12 If necessary and appropriate, police and/or Children's Services may be consulted if there is reasonable cause to believe that a child is suffering or is likely to suffer significant harm.
- 17.13 On an individual level, a time may be set to meet the target and perpetrator and review the situation, which will have been closely monitored by the Deputy Head/Year Head and Staff in the SS, or Class Teacher, Key Stage Leader and Head of Lingfield College Prep. The follow-up will provide an opportunity for the teacher to assess whether the particular strategies were successful or not.
- 17.14 The target should be interviewed at a later stage by the pastoral team as appropriate to check that the situation has improved, and if necessary to remind them that revenge is inappropriate. They should be offered appropriate support where needed.
- 17.15 Dealing with a report of bullying in the Foundation Stage:
 - Children will have friendship stories read to them.
 - Role play games around feelings will be introduced and discussions about how to manage their feelings will be put in place.
 - Child/children will be shadowed and spoken to as soon as a situation arises.
 - Parent/parents will be kept informed on a regular basis.

18.0 PREVENTION

- 18.1 All children from Reception to Year 6 are given a leaflet about bullying when they start the school. This contains advice and useful website addresses and telephone numbers, e.g., Childline 0800 1111, www.childline.org.uk. These websites also have useful advice for teachers.
- 18.2 All staff should encourage self-esteem – both through the reward system and by praising students.
- 18.3 Regular discussions of school policy at Staff Meetings and appropriate INSET will raise awareness of the issues for staff so that they will take action to reduce the risk of bullying at times and in places where it is most likely to take place.
- 18.4 The classroom ethos should promote respect for the individual, e.g., classroom rules which forbid anti-social behaviour.
- 18.5 Childline posters are displayed around the school, including the pupils' toilets.
- 18.6 The School Counsellor in Lingfield College is an integral part of the school's pastoral support provision and provides specialist skills of assessment and counselling. The Counsellor is available to



give confidential advice and support to pupils who can refer themselves to her with social, emotional or behavioural concerns. Staff can also refer pupils.

18.7 Other strategies include:

- Implement classroom strategies and discuss the definition of bullying
- Suitable times for discussion include:

Lingfield College Prep: circle time, PSHE & Citizenship

Lingfield College: Form period, PSHE, Assemblies (Whole School or Year), School Council Meetings, Pupil Focus Groups

- Through the curriculum it is possible to explore issues about bullying, e.g., Drama, English, MFL
- Restricting access to certain internet sites

- 18.8 Implement whole school strategies, such as Assemblies, talks by visiting speakers (e.g., Police, e-Safety talks etc.), Pupil Code of Conduct (available on Firefly) buddy schemes and peer mentoring. Workshops and talks about e-Safety and the dangers of the internet and social networking are given to pupils from Year 5 onwards. Parents are also regularly invited to talks by external speakers, and training is given to staff. Parents will be informed by email of concerning trends to be aware of, e.g., Snapchat show and tell game.
- 18.9 During breaks and lunchtimes, staff on duty supervise playground areas, classrooms, corridors, locker rooms and the dining room, and are encouraged to be proactive in their presence around the school.
- 18.10 In both Lingfield College and Lingfield College Prep, regular Pastoral Bulletins are sent to all teachers, teaching assistants & other relevant staff which highlight any pupils who need close monitoring or where there are concerns about their behaviour.
- 18.11 In Lingfield College Prep Year 5 Playground Pals may assist pupils with any social issues on the Key Stage 1 playground. Discussion boxes are put in each classroom in Key Stage 1 & 2 so that support and advice can be given in classroom discussions or personally.
- 18.12 On Firefly there is an online worry box, pupils can log any concerns they have about themselves or another pupil anonymously and these are monitored daily by the Deputy Head Pastoral in Senior School. (<https://lingfieldcollege.fireflycloud.net/safeguarding>). In the Prep School there is a button where children can log a concern or worry for their teacher to follow up.
- 18.13 Pupil Focus Groups:
- At Lingfield College, the Deputy Head (Pastoral) holds regular Pupil Focus Groups each term and asks students a range of questions about bullying at the school
 - In Lingfield College Prep, Pupil Focus Groups for Year 3 to 6 discuss issues which include bullying. On occasion governors may also attend.
- 18.14 Anonymous online questionnaires are used to ask pupils from different year groups about problems with bullying to provide senior staff with a valuable overview. Data from these questionnaires can then be used to inform parents at Transition Evenings (for those about to start at the school), Governors and staff.
- 18.15 Issues surrounding Bullying and how to prevent it are discussed at School Council meetings.
- 18.16 Class Teachers, Form Tutors, Heads of Year, the Deputy Head (Pastoral) and Head of Lingfield College Prep are all available if a student is experiencing any concerns regarding bullying.
- 18.17 To help prevent cyberbullying, mobile phones are not allowed during school hours and pupils are expected to turn them off and keep them in their school bag or locker, unless a teacher gives them



permission to use it in a lesson. If students use iPads or laptops in lessons, they are monitored closely to ensure that they only use these devices for work. Sanctions are applied to students who are seen with mobile phones during the school day (see Mobile Phone Policy for more detail). At Lingfield College Prep pupils are not allowed mobile phones or devices in school, unless permission is given by the Head of Prep School and only in exceptional cases. These are looked after by the Class Teacher or the school office

18.18 All members Lingfield College community know and understand the acronym TAG and RAG. TAG is from the perspective of the target and RAG is from the bystander's viewpoint:

- **T**ell the person they are upsetting you, doing something you don't like or want done
- **A**sk them to stop
- **G**et help from a trusted adult or person
- **R**ecognise someone else is the subject of harm
- **A**sk them if they are OK and ask the person to stop it
- **G**et help from a trusted adult or person
- At the start of the year all pupils will be introduced/reminded of this and told who their trusted adult could be (tutor, class teacher, subject teacher, DSLs, welfare officer, counsellor, office staff etc). The DSL will also explain to all pupils that any concerns they raise will be taken seriously and dealt with promptly
- There are posters around the school to raise awareness and encourage children to use the TAG/RAG approach. This will also be reinforced through the Anti-bullying Ambassadors.

There is also a reporting button on Firefly for children to use as another way of contacting teachers.

- 18.19 In the Senior School we have Anti-bullying Ambassadors who have received specialist training from The Diana Award to understand what bullying is and to recognise when peers are being bullied; encourage their peers to be an upstander and stand up to bullies; support a peer who may be experiencing bullying behaviour and to devise and deliver a whole school Anti-bullying Campaign.
- 18.20 All staff will reinforce that child-on-child abuse should never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'. The School has a zero-tolerance approach to abuse and all disclosures will be taken seriously.
- 18.21 Our close community, excellent knowledge of each individual pupil and our proactive pastoral teams are well placed to spot this form of behaviour and raise awareness before the situation escalates. However, we recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported.
- 18.22 In the Senior School as part of statutory relationships, sex and health education, we provide extensive learning on relationships through a spiral PSHE education curriculum, based on the PSHE Association's programme of study. Our schemes of work build on prior knowledge, with the importance of healthy relationships developed during earlier years and a focus on specific aspects – including teen relationship violence, sexual exploitation, coercion and consent– at an appropriate stage.
- 18.23 In the Prep School we provide lessons during PSHE and during wellbeing afternoons



19.0 SUPPORTING TARGETS OF BULLYING

To support targets of bullying:

- Try to help them realise that they may need to help themselves
- Encourage the pupil to speak openly
- Reassure the pupil that staff will help but cannot keep the situation secret if there is any risk of harm.
- If a pupil is a perpetual 'target' of bullying by different groups or individuals, try to observe and help them change any behaviour. It may help to see the Lingfield College Counsellor or receive external support (e.g., an Educational Psychologist)
- Encourage self-esteem
- Listen to their views and anxieties
- Give responsibilities so that the pupil feels valued.
- Encourage them to do things they are good at.
- Praise achievement and encourage positivity.
- Discuss the situation with the pupil's parents
- Encourage the target to contact the Anti-Bullying Ambassadors for peer support
- Provide access and information on groups and activities at break and lunchtimes to offer support from the Wellbeing staff team

20.0 HELPING THE BULLYING CHILD

To help the bullying child:

- See if the bully has any ideas about why they bully and refer to reasons why people bully.
- Find ways to make amends for their behaviour.
- Explore steps to change their behaviour.
- Praise good behaviour to raise self-esteem.
- In Lingfield College Prep, invite the child to join a weekly social group.
- In Lingfield College Senior School, invite the child to join a social group that is suitable.
- Discuss the situation with the pupil's parents



CYBERBULLYING

21.0 WHAT IS CYBERBULLYING?

21.1 Cyberbullying is the use of ICT (Information and Communication Technology), commonly a mobile phone or the internet, to deliberately upset someone else.

21.2 Cyberbullying can:

- be used to carry out different types of bullying
- be an extension of face-to-face bullying
- also go further in that it can invade home/personal space and can involve a greater number of people
- take place across age groups; school staff and other adults can also be targeted
- draw bystanders into being accessories;
- include: threats and intimidation; harassment or 'cyber-stalking'; vilification/defamation; exclusion or rejection by peers; impersonation; unauthorised publication of private



information or images; manipulation of images; taking video clips and posting them on social media sites, writing unkind/malicious comments on social media posts

- include upskirting

22.0 INTRODUCTION TO CYBERBULLYING

22.1 The purpose of this specific section of the policy is to ensure that:

- Pupils, staff and parents understand what cyberbullying is and its possible consequences
- Knowledge, policies and procedures are in place to prevent incidents of cyberbullying in school or within the school community
- Appropriate measures are in place to deal effectively with cases of cyberbullying
- Preventative measures can be monitored effectively.

22.2 It is crucial that children are safeguarded from potentially harmful and inappropriate material online whilst they are at school. Keeping Children Safe in Education 2024 gives guidance on the subject of online safety in schools: *'It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school and college approach to online safety empowers a school or college to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.'*

- **Content:** being exposed to illegal, inappropriate or harmful content, for example pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **Contact:** being subjected to harmful online interaction with other users, for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct:** online behaviour that increases the likelihood of, or causes, harm; for example: making, sending and receiving explicit images, (e.g., consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying.
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<http://apwg.org>) KCSIE 2024

22.3 The Governors recognise that they are expected to do all they reasonably can to limit children's exposure to the risks detailed above and ensure that the school maintains appropriate



filters and monitoring systems to prevent children from accessing harmful or inappropriate material from the school's IT system.

22.4 The Senso alerting filter is in place to identify those students who may be trying to access harmful and inappropriate material online – a log of blocked searches made on the school system is checked by the Senior and Pre School-DSLs on a daily basis.

- Senso is a cloud-based application that monitors classroom computers and students' team chats. It sends an alert to the DSLs if it detects bullying type language being used in Teams chats;
- It logs activity such as keywords, visual threats and phrases

22.5 Libra ESVA is our e-mail filter. It uses a combination of AI and keyword lists to ensure the staff and students don't receive any elicited or dangerous e-mails.

22.6 Staff are expected to pay attention to pupils' use of the internet and electronic devices with the aim of keeping them safe online, flagging up the need for change or improvement where necessary. Pupils are also encouraged to continue to reduce risks and build their own resilience (including to radicalisation, cyberbullying and potential sexual exploitation).

22.7 The school ensures that by means of the Staff Code of Conduct, which all staff sign (and briefings or emails where relevant) all staff are aware of school guidance for their own use of mobile technology; safeguarding INSET training also covers potential safeguarding issues around staff use of personal devices, particularly at the Prep School. This is in the staff handbook as well as in a range of policies on the intranet and school website.

22.8 Some features of cyberbullying differ from other forms of bullying and may prompt a particular response. The key differences are:

- **impact:** the scale and scope of cyberbullying can be greater than other forms of bullying
- **targets and perpetrators:** the people involved may have a different profile to traditional bullies and their targets
- **location:** the 24/7 and omnipresent nature of cyberbullying
- **anonymity:** the person being bullied will not always know who is bullying them
- **motivation:** some pupils may not be aware that what they are doing is bullying; they may be encouraged to join in when they might not normally do so if events were taking place face to face
- **evidence:** unlike several other forms of bullying, the target of the bullying will have evidence of its occurrence.

22.9 It is perfectly possible that a member of staff may be a target of cyberbullying, and these responses apply to them also.

22.10 The Headmaster has the power 'to such extent as is reasonable to regulate the conduct of pupils when they are off-site or not under the control or charge of a member of staff' (Education and Inspections Act 2006)

22.11 School staff may request a pupil to reveal a message or other phone content and may confiscate a phone, although they may not search the contents of the phone unless the Deputy Head (Pastoral) or Headmaster agrees. Staff may confiscate equipment and return it to the Deputy Head and IT Support for a more detailed investigation.



23.0 EXAMPLES OF CYBERBULLYING

23.1 Sexting

- Sexting is the term used to describe the sending of explicit sexual images ('nude image sharing') electronically. This can be via a mobile phone, e-mail or via instant messaging services such as Twitter, Snapchat, Facebook, Instagram, WhatsApp and TikTok.
- Under the Sexual Offences Act (2003) taking an indecent image of a child (someone under the age of 18) is illegal. It is also illegal to send or be in possession of such an image. This law applies even to a young person taking and sending an image of themselves and applies to anyone receiving such an image if they do not delete it immediately. They should also advise someone appropriate (an adult) of their actions. Obviously, any sharing of such images is also illegal. There may also be further legal implications if an older pupil/student request such pictures of a younger pupil/student, and this could be viewed as 'grooming'.
- Pupils/students should be aware that no data is ever completely erased from a computer or phone – should they ever find themselves the subject of a serious investigation into their 'online' behaviour, forensic examination of devices will retrieve all deleted images, texts, tweets and emails.
- The main concern about 'sexting' is that once an image is sent by a pupil/student it is then beyond their control. Sadly, there have been numerous cases of such images then being distributed far beyond a school community with serious and far-reaching consequences.
- The requesting of such pictures is not appropriate within our school community. Firstly, it is asking another person to break the law, and secondly because such action does not demonstrate the respect and kindness towards others that is expected. If such behaviour is brought to the attention of the School, it is likely to result in suspension; sending or distributing such pictures is illegal and is also likely to lead to suspension.

23.2 Trolling

- Described as the internet equivalent of road rage, trolling is a criminal offence in its most extreme form. Trolling is a broad term, taking in everything from a cheeky provocation to violent threats, tapping into people's desire to poke fun, make trouble and cause annoyance.
- Internet experts say the key is not to "feed the troll" by offering them a response. Offensive messages should be reported to the school and support will be provided. The school will treat trolling as cyberbullying.

23.3 Upskirting

- This typically involves taking a picture under a person's clothing without them knowing with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the target humiliation, distress or alarm.



24.0 PREVENTING CYBERBULLYING

- 24.1 The DSL is responsible for overseeing the practices and procedures outlined in this policy and for monitoring its effectiveness. They will report to the Headmaster.
- 24.2 Staff receive training in identifying cyberbullying and understanding their responsibilities. They are also updated on significant developments in technology. The DSL liaises with IT Support to check for trends and patterns of pupil behaviour.
- 24.3 Pupils are educated about cyberbullying through a variety of means, including assemblies, Anti-bullying strategies, projects, E-Safety training, academic work (in subjects such as Drama, English, PSHE) and posters displayed around the school.
- Pupils and staff agree to a Computer Usage Policy every time they log in to the school network.
 - Pupils in KS1 and KS2 in Lingfield College Prep are taught about SMART annually and sign a SMART agreement about using technology safely and respectfully.
 - In Years 7-13 the pupils will have to read through the Use of ICT and Mobile Phone Policy which is in the Pupil Code of Conduct with their form tutor. This will be set on Firefly as a task, and they will have to click to complete the task and agree to abide by the rules. Within this there is advice about staying safe online.
 - Pupils should be just as clear about what is expected of them online and offline
- 24.4 Promoting the positive use of technology - the School aims to:
- Make positive use of technology across the curriculum
 - Use CPD opportunities to help staff develop their practice creatively and support pupils in safe and responsible use
 - Ensure all staff and children understand the importance of password security and the need to log out of accounts
 - Advise all users to change their online passwords regularly
- 24.5 Parents will be informed by email of concerning trends to be aware of, e.g., Snapchat show and tell game. There is also information for parents on our website.

25.0 PROCEDURE IF BULLYING IS SUSPECTED

- 25.1 If images are involved, determine whether they might be illegal or raise child protection concerns. If so, staff or students should contact the DSL and be mindful that receiving or distributing indecent



images of a minor is an offence. Therefore, they should not encourage pupils or parents to forward indecent images to them

25.2 Any allegations against staff should be discussed with the Headmaster in the first instance, who may decide to ask advice from the Surrey LADO (Local Authority Designated Officer) on **0300 123 1650*** or LADO@surreycc.gov.uk.

25.3 Making reporting easier:

- Publicise and promote the message that asking for help is the right thing to do and shows strength and good judgement
- Publicise to all members of the school community the ways in which cyberbullying can be reported
- Provide information on external reporting routes e.g., mobile phone company, internet service provider, Childline
- The CEOP 'Report Abuse' button is on the school website and pupils in KS2 and above are taught about when to use this.

25.4 Investigation - staff and pupils are advised to:

- preserve evidence and a record of abuse
- save phone messages
- save and print instant messenger conversations
- take screen shots of social network pages
- save and print whole email messages

25.5 Key consideration should be given for staff not to view or forward illegal images of a child. Further advice on this can be found in the document Search, Screening and Confiscation Advice for Schools, available in the online staff handbook.

25.6 Support for the person being bullied online

- Offer emotional support; reassure them that they have done the right thing in telling a responsible adult
- Advise the person not to retaliate or reply. Instead, keep the evidence and take it to their parents or a member of staff

25.7 Advise the person to consider what information they have in the public domain

- Unless the target sees it as a punishment, they may be advised to change personal details e.g., mobile phone number
- If hurtful or embarrassing content is being distributed, try to get it removed from the internet. If the person who posted it is known, ensure that they understand why it is wrong and ask them to remove it. Alternatively, contact the host provider and make a report to



get the content taken down: guidance on this can be found at www.childline.org.uk/explore/online/safety/Pages/Sexting.aspx

- Confiscate the relevant mobile phone, ask the pupil to delete the offending content and say who they have sent it on to
- Contact the police in cases of actual/suspected illegal content
- Advise the person being bullied to block the person bullying from their sites and services

25.8 Work with the bully and apply sanctions - any outcome must include helping the bully to recognise the consequences of their actions and providing support to enable the attitude and behaviour of the bully to change.

25.9 The aim of the sanctions will be:

- to help the person harmed to feel safe again and be assured that the bullying will stop
- to hold the perpetrator to account, getting them to recognise the harm caused and deter them from repeating the behaviour
- to demonstrate to the school community that cyberbullying is unacceptable and that the school has effective ways of dealing with it, thus deterring others from behaving similarly.

25.10 Sanctions for any breaches of the Acceptable Use of ICT Policy will be applied and can range from confiscation of a mobile device to exclusion.

25.11 In applying sanctions, consideration must be given to the type and impact of bullying and the possibility that it was unintentional or was in retaliation.

25.12 In Lingfield College Prep, should a child be found to break the SMART rules the punishment will depend on what they did and how serious it was.

SMART stands for Safe/Meet/Reliable/Accept/Tell. Punishment will be decided upon by the Head of Prep School. Punishment may include break time or Saturday detention and/or missing Computing curriculum time. If the offence is deemed serious enough, parents will be informed.

Last reviewed August 2024

Next review due August 2025