



SINCE 604 AD

KING'S SCHOOL

ROCHESTER

Whole School Anti-Bullying Policy including boarders and EYFS

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Introduction

King's School Rochester is committed to fostering a spirit of mutual trust between pupils and staff and to creating and sustaining a friendly, supportive, safe and structured environment in which pupils develop confidence and self-esteem and in which they show consideration for the dignity of others.

1 Aims

1.1 The aims of this policy are:

- to actively promote and safeguard the welfare of pupils at the School;
- to maintain and drive a positive and supportive culture among all pupils and staff throughout the School;
- to prevent bullying, detect it when it occurs, and respond to it appropriately on a case-by-case basis; and
- to encourage pupils to tell someone if they or others are being bullied.

2 Scope and application

2.1 This policy applies to the whole School including the Early Years Foundation Stage (EYFS) and Boarders, encompassing children from aged 2-18.

2.2 This policy applies at all times when the pupil is:

- in or at School;
- representing the School or wearing School uniform;
- travelling to or from School;
- on School-organised trips;
- associated with the School at any time;
- any time the School becomes aware of an incident of bullying.
- the School recognises that true bullying behaviour requires intent. For our youngest pupils, particularly 2- and 3-year-olds, hurtful physical behaviors (such as biting or pushing) are treated as developmental and behavioral learning opportunities managed under the Behaviour Policy, rather than disciplined as bullying.

2.3 This policy shall also apply to pupils at all times and places in circumstances where failing to apply this policy may:

- affect the health, safety or well-being of a member of the School community or a member of the public;
- have repercussions for the orderly running of the School; or
- bring the School into disrepute.

2.4 Boarding:

- The School recognises that boarding can present additional risks and concerns for boarders, particularly where they may have limited opportunity to distance themselves from a peer who is bullying them. The Boarding House provides clear signposting to the different ways in which boarders can seek help and support, both within the House and across the wider School, including access to the Independent Listener.
- Any allegation or incident of bullying within the boarding community will be taken seriously and responded to in accordance with the Boarding Sanctions Policy. Where the nature or seriousness of an incident requires further escalation, the School's Behaviour Policy and associated procedures will be applied. Where concerns arise regarding relationships or behaviour within the boarding community,

parents will be kept appropriately informed and, where appropriate, restorative approaches will be used to help repair relationships and support boarders to continue living together safely, respectfully and positively.

3 Regulatory framework

3.1 This policy has been prepared to meet the School's responsibilities under:

- Education (Independent School Standards) Regulations;
- Statutory framework for the Early Years Foundation Stage;
- Education and Skills Act 2008;
- Children Act 1989;
- Childcare Act 2006;
- Data Protection Act 2018 and General Data Protection Regulation (GDPR);
- The Equality Act 2010.
- National Minimum Standards for Boarding May 2026

3.2 This policy has regard to the following guidance and advice:

- Preventing and tackling bullying: Advice for headteachers, staff and governing bodies 2017
- Cyberbullying: Advice for headteachers and school staff 2014
- Advice and guidance: How can we stop prejudice-based bullying in schools (Equality and Human Rights Commission)
- Keeping children safe in education (2016 DfE)
- Working Together to Safeguard Children (2026, HM Government)
- Searching, Screening and Confiscation: Advice for schools (2022, DfE)
- Sexual violence and sexual harassment between children in schools and colleges
- Behaviour in Schools: Advice for headteachers and school staff (2024, DfE)
- Mental health and behaviour in schools (2018, DfE)

3.3 The following School policies, procedures and resource materials are relevant to this policy:

- Whole School Behaviour Policy;
- Whole School Suspension, Exclusion, Removal and Review Policy;
- Whole School Digital Services Policy (Including the Pupil and Staff Acceptable Use of ICT Agreement).
- Whole School Safeguarding and Child Protection Policy
- Whole School SEND Policy.

4 Responsibility statement and allocation of tasks

4.1 The Governing Body has overall responsibility for all matters which are the subject of this policy. Responsibilities include:

- Overall accountability for the Anti-Bullying Policy
- Approves the policy and reviews it annually
- Monitors incidents and trends via termly safeguarding reports from DSL

5 Publication and availability

5.1 This policy is published on the School website.

5.2 This policy is available in hard copy on request.

5.3 This policy can be made available in large print or other accessible format if required.

6 Definitions

6.1 Where the following words or phrases are used in this policy:

- References to the Head may include as appropriate the Principal, the Vice Principal (Junior School), Vice Principal (Senior School) and/or the Deputy Head Pastoral.
- References to Parent or Parents includes one or both of the parents, a legal guardian or education guardian.

7 Bullying

7.1 Our HEART Values are at the core of our community and, as any sort of bullying will immediately impact a pupil's ability to be Happy whilst they are at King's, Bullying is wholly contrary to our community values.

7.2 Bullying is always unacceptable and will not be dismissed as being normal or as "banter" or simply "part of growing up".

7.3 All members of the King's School Rochester community have the right to remain free from bullying or the fear of bullying. All members are free to be able to report any concerns related to bullying in the certain knowledge that those concerns will be listened to and the matter investigated by those competent to do so.

7.4 Every member of the school can expect to be treated with respect, dignity and tolerance irrespective of their religious beliefs, sexuality, ethnic background, aptitude or disability. No victim should ever be made to feel ashamed.

7.5 Pupils are expected to treat others as they would wish to be treated themselves.

7.6 Members of the school community have both an individual and collective obligation to report any incident of bullying whenever or wherever it might occur, and have a right to expect that appropriate action will be taken to prevent its repetition.

7.7 Those who bully should be aware that a zero-tolerance approach will always be taken; this may include help and anti-bullying training.

7.8 Bullying will not be tolerated by the School because:

- it is harmful to the person who is bullied, to those who engage in bullying behaviour, and those who support them;
- it interferes with a pupil's right to enjoy their learning and leisure time free from intimidation;
- it is contrary to all our aims and values, our culture and the reputation of the School.

7.9 Bullying is repetitive behaviour by an individual or group that intentionally hurts another individual or group either physically or emotionally. Bullying is often motivated by prejudice against particular groups and includes child-on-child abuse. Bullying may be:

- Physical: hitting, kicking, pushing people around, spitting, or taking, damaging or hiding possessions
- Verbal: name-calling, taunting, teasing, insulting or demanding money
- Exclusionary behaviour: intimidating, isolating or excluding a person from a group
- General unkindness: spreading rumours or writing unkind notes, mobile phone texts or emails;
- Behaviour which takes advantage of an imbalance of power.
- Low level disruptive behaviour: "roasting", "banter" and "horseplay" over a prolonged period of time;
- Cyberbullying: bullying that takes place using technology. This may include bullying through the use of mobile electronic devices, social media or gaming sites. See Appendix 1 to this policy for guidance for pupils about cyberbullying. The Whole School Digital Services Policy (including the Pupil and Staff Acceptable Use of ICT Agreement) sets out the School rules about the use of technology including mobile electronic devices.
- Harmful sexual behaviours: includes sexual harassment and sexual violence:
 - sexual harassment: unwanted conduct of a sexual nature that can occur online and offline. It can include but is not limited to:
 - sexual jokes or taunting;
 - physical behaviour such as deliberately brushing against someone, interfering with their clothes, displaying pictures, photos or drawings of a sexual nature;
 - online sexual harassment which may include: non-consensual sharing of sexual images and videos (sexting); inappropriate sexual comments on social media; inappropriate use of AI; exploitation; coercion and threats.
 - incidences of sexual harassment will be investigated to ensure they are not part of a wider pattern of sexual harassment and / or sexual violence.
 - sexual violence: sexual offences under the Sexual Offences Act 2003, specifically rape, assault by penetration and sexual assault. Incidents of sexual abuse outside of school will be treated by the school in the same way as those occurring within school.

7.10 Bullying may also be:

- sexist: related to a person's sex or gender reassignment;
- racist, or regarding someone's religion, belief or culture;
- related to a person's sexual orientation (homophobic bullying);
- related to pregnancy and maternity;
- related to a person's home circumstances; or
- related to a person's disability, special educational needs, learning difficulty, health or appearance.

7.11 It is understood that not all bullying is deliberate or intended to hurt. Some individuals may see their hurtful conduct as "teasing" or "a game" or "for the good of" the other person. These forms of bullying are equally unacceptable but may not be malicious and can often be corrected quickly with advice and without disciplinary sanctions. However, if left unchallenged or dismissed, low level disruption of this type can have a wearing, and significant impact on targeted individuals exposed to such behaviour.

7.12 Bullying may also be regarded as threatening behaviour or harassment which can be either a criminal offence or a civil wrong. Misuse of electronic communications could also be a criminal offence – for example, it is an offence to

send an electronic communication (such as a text message or email) to another person with the intent to cause distress or anxiety.

7.13 Some behaviour by a pupil towards another may be of such a nature that safeguarding concerns are raised. Such behaviour may include bullying (including child-on child abuse, cyberbullying and prejudice-based bullying), causing physical harm, initiation / hazing type violence (a ritual imposed on a person who wants to join a group) and rituals, sharing of nude or semi-nude images/creating images using AI or any form of sexual harassment or violence.

7.14 The School's policy and procedures with regard to child on child abuse are set out in the King's Safeguarding and Child Protection Policy. Concerns about a pupil's welfare because they are the victim or perpetrator of bullying behaviour must be reported in accordance with the King's Safeguarding and Child Protection Policy and appropriate action taken, taking into account the Local Safeguarding Partners' threshold document.

7.15 The School will always treat a bullying incident as giving rise to a child protection concern when there is reasonable cause to believe that a child (whether victim or perpetrator) is suffering or likely to suffer significant harm.

8 Anti-bullying culture and systems

8.1 It is everyone's responsibility to ensure, whatever the circumstances, that no-one becomes a victim of bullying. A person may be vulnerable to bullying because of their age, physical appearance, nationality, colour, sex, sexual orientation, gender reassignment, religion or belief, culture or learning difficulty, disability, home circumstances or because they are new in the School, appears to be uncertain or has no friends. They may also become a target because of an irrational decision by a bully.

8.2 Our expectation of all members of the School community is that:

- everyone will uphold the School rules;
- a pupil or a member of staff or volunteer who witnesses or hears of an incident of bullying will report it in accordance with the terms of this policy;
- a complaint of bullying will always be taken seriously;
- no-one will tolerate unkind actions or remarks or stand by when someone else is being bullied.

8.3 In School and in every year group:

- discriminatory and offensive words and behaviour are treated as unacceptable;
- positive attitudes are fostered towards people with any protected characteristic including those who are disabled and towards ethnic, religious, cultural and linguistic groups within and outside the School; and
- positive attitudes are fostered towards gender and sexuality differences through the curriculum and tutorials.

8.4 The Governing Body has overall responsibility for promoting and safeguarding the welfare of pupils at the School, ensuring that those in leadership and management positions actively promote pupil well-being. This includes ensuring that policies and procedures are in place and implemented effectively to:

- minimise the risk of bullying at the School so that pupils and staff feel safe and secure;

- intervene early in low-level disruption to prevent negative behaviours escalating;
- deal swiftly with allegations and incidents of bullying at the School so that pupils and staff feel confident that all incidents will be dealt with appropriately;
- consider incidences of sexual harassment in broad terms so that it is challenged in order to prevent the normalisation of behaviours which can provide an environment that may lead to sexual violence.

8.5 Through their training and experience, members of staff and volunteers are expected to promote an anti-bullying culture by:

- celebrating achievement;
- anticipating problems and providing support;
- adopting a proactive interactive approach to bullying by gathering intelligence about issues between pupils which might provoke conflict and developing strategies to prevent bullying occurring in the first place;
- disciplining perpetrators fairly, consistently and reasonably, taking into account any special educational needs or disabilities of the pupil, taking into account the motivations and any underlying safety concerns of the perpetrator and providing support as appropriate;
- making opportunities to listen to pupils;
- acting as advocates of pupils;
- recognise intolerance

Members of staff and volunteers are vigilant at all times and particularly:

- at the start and end of the school day when pupils arrive and leave the site;
- before and after lessons, and during playtimes/ breaks;
- in the queue for the dining hall and in the dining hall itself;
- in School corridors;
- in sport changing rooms;
- on School transport / School trips.

The wellbeing of children is discussed at staff meetings and briefings. The purpose of these discussions is to give feedback about friendship patterns, particular incidents, any pupil who seems to be isolated, any growing "power base", any development of spaces where others are made to feel uncomfortable and any known conflict between pupils so that strategies can be developed to prevent bullying incidents.

8.6 Through the School's pastoral care systems and PSHEE (Personal, Social, Health and Economic Education) programme, pupils are informed and taught that bullying will not be tolerated in the School. They are encouraged:

- to celebrate the effort and achievements of others;
- to hold and promote positive attitudes;
- to feel able to share problems with staff;
- to turn to someone they trust, if they have a problem;
- not to feel guilty about airing complaints;
- to be kind, considerate and tolerant towards others;
- to be aware of the impact their behaviour can have on others;
- to challenge their peers if they are unkind to others;

- to celebrate the diversity of others and avoid prejudice-based language;
- to use technology safely and securely and to be aware of the risks and impact of the use of technology on themselves and others.

Measures are taken throughout each year to educate pupils about bullying and this policy. These measures may include the following:

- all new pupils are made aware of the school's expected standards of behaviour. They are told what to do if they encounter bullying;
- the curriculum includes lessons on bullying by teaching the moral and spiritual values that show bullying to be unacceptable and by developing social skills;
- anti-bullying posters are placed around the School;
- anti-bullying messages are given in assemblies;
- national campaigns are used to raise awareness amongst the School community;
- online safety is a key aspect of all areas of the curriculum. Parents are informed about online safety issues and the School's strategies to safeguard pupils through correspondence and annual events held by the School to raise awareness. See the School's online safety policy for further information about the School's online safety strategy;
- our trained School Counsellor - pupils can be referred or in the Senior School, can refer themselves to the counsellors when they have social, emotional or behavioural concerns and in the Junior School a referral is made by staff;
- access to the Chaplain who will provide confidential advice and seek to encourage the development of tolerance, understanding and respect for others in a multi-faith community;
- the Wellbeing Centre which will display advice on where pupils can seek help, including details of confidential helplines and websites connecting to external specialists such as Childline, Kidscape, Get Connected, Samaritans etc; National Bullying Helpline <https://www.nationalbullyinghelpline.co.uk/about.html> Bullying; Kooth
- Prefects and Peer Mentors who are given leadership and training to cover the importance of offering support and assistance to younger and vulnerable pupils;
- the Chaplain as head of the Diversity & Inclusion Alliance who will be available to give specialist and confidential advice to LGBTQIA+ pupils;
- pupils having access to a specific email address (concerns@kings-rochester.co.uk) to record and share concerns with staff;
- anonymous reporting may take place. Pupils may report anonymously if they feel more comfortable doing so, e.g. in the Preparatory part of the Junior School there is a 'Bob box'. Pupils using these methods are encouraged to leave identifying details in order that appropriate support may be offered.

The School recognises that children with special educational needs and disabilities can face additional safeguarding challenges, including the potential to be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs. The School will consider extra pastoral support for pupils with special educational needs and disabilities, as required.

8.7 The School will take active measures to promote an anti-bullying culture and send a message to parents that bullying amongst pupils or towards staff will not be tolerated by the School.

9 Reporting concerns

9.1 A pupil who is being bullied, or who is worried about another pupil being bullied, should tell someone without delay and can do so in several ways. They can:

- in the Senior School: tell their parent, a friend, Tutor, Housemaster / Housemistress, member of the Safeguarding Team, a Prefect or Peer Mentor, School Counsellor, School Nurse or any member of staff or volunteer at the School they feel they can confide in;
- in the Preparatory part (Year 4 - 8) of the Junior School : tell their parent, a friend, class teacher, the School Nurse, Tutor or any member of staff or volunteer at the School they feel they can confide in;
- in the Pre-Preparatory part (Nursery - Year 3) of the Junior School: tell their parent or any member of staff they feel they can confide in;
- contact concerns@kings-rochester.co.uk (dedicated King's Rochester contact email address) or the anonymous reporting link [here](#); and/or
- contact Childline (0800 1111).

9.2 Parents who are concerned that their child or another pupil within the school is being bullied should inform an appropriate member of staff. This is likely to be:

- in the Senior School: the Tutor or Housemaster / Housemistress
- in the Preparatory part (Year 4 - 8) of the Junior School : the Tutor, or Deputy Head Pastoral, Head of Middle School (Year 7 and 8) or Vice Principal ; and
- in the Pre-Preparatory part (Nursery - Year 3) of the Junior School: their child's class teacher, a teaching assistant, the Vice Principal or Vice Principal.

9.3 A member of staff or volunteer who learns of alleged bullying behaviour should:

- respond quickly and sensitively by offering advice, support and reassurance to the alleged victim. No victim should ever be made to feel ashamed;
- listen carefully and keep an open mind;
- not ask leading questions;
- reassure the child but not give a guarantee of confidentiality;
- report the allegation to an appropriate colleague as follows:
 - in the Senior School: the Housemaster / Housemistress, but it may also be the Head of Upper School, the Deputy Head Pastoral or the Vice Principal (Senior School);
 - in the Junior School: the Deputy Head Pastoral or Vice Principal or the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead;
 - follow the guidance on responding to allegations and incidents of bullying. This will include staff completing an incident on CPOMs.
 - for a safeguarding concern, follow the guidance on responding to suspected safeguarding incidents as laid out in the School's Safeguarding and Child Protection Policy.

This policy focuses mainly on the bullying of pupils by pupils although it is recognised that a staff member could be a victim of and on occasion may be perceived to be the perpetrator of bullying behaviour. The bullying of staff, whether by pupils, parents or other colleagues, is unacceptable. Staff members who are concerned about being bullied or harassed should refer to the staff code of conduct, whistleblowing policy and/or the low level concern

policy. Pupils, other staff or parents who feel that a member of staff is bullying should report this in accordance with the procedures set out above.

10 Why incidents might not be reported

10.1 There are many reasons why a pupil who has suffered bullying may be reluctant to report it. They may be concerned about or even frightened of the consequences of reporting it and/or may become demoralised and may think, for example:

- it is telling tales;
- they won't believe me because the person I am complaining about is popular and I am not, and I will become even more unpopular;
- the things they are saying and doing are too embarrassing to discuss with an adult;
- it is all my fault anyway for being overweight / too studious etc;
- there are too many of them; there is nothing the staff can do;
- it will get back to my parents and they will think less of me;
- I will just try and toughen up and grow a thicker skin;
- I will lie low and not draw attention to myself;
- this is a normal part of growing up and going to school.

10.2 There are also reasons why a pupil who has witnessed or learned of bullying behaviour may not want to make a report. They may think:

- it is "grassing / snitching" and I will become unpopular;
- it is not my concern anyway;
- I don't like the victim and I would find it embarrassing to be associated with him / her;
- I am concerned about /frightened of the consequences of reporting it.

10.3 Any of these responses would be contrary to our culture at the School. When we implement this policy we encourage every pupil (and their parents) to understand that:

- every complaint of bullying will be taken seriously;
- members of staff and volunteers will deal with a complaint correctly and effectively in accordance with their experience and the training they have received;
- there is a solution to nearly every problem of bullying;
- a pupil who complains will receive support and advice and in many cases the problem can be dealt with on a no-names basis;
- the primary aim will be for the bullying to cease, not the punishment of the bully unless this is necessary;
- we may need to support the bully as well so we can address the causes of bullying behaviour.

11 Assessment of concerns

11.1 A staff member will normally see the victim and (unless the case is very serious) any witnesses without delay and form an initial view of the allegation. The investigation will consider:

- the nature of the incident(s): physical? sexual? verbal? exclusionary? etc.
- is it a "one-off" incident involving an individual or a group?
- is it part of a pattern of behaviour by an individual or a group?
- has physical injury been caused?

- who should be informed?
- can the alleged bully be questioned without disclosing the victim's identity?
- what is the likely outcome if the allegation proves to be correct?

11.2 At this stage, the possible outcomes for an incident which is not too serious include:

- there has been a misunderstanding which can be explained sympathetically to the alleged victim with advice to the alleged bully; or
- the complaint is justified in whole or in part, and further action will be needed.

11.3 If at any stage the alleged bullying behaviour raises a safeguarding concern, the School's Safeguarding and Child Protection Policy should be followed before further investigation is carried out. This will always be the case where the sharing of nudes or semi nudes / use of AI generated nude images (the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18) or other harmful sexual behaviours are involved. Where bullying allegedly involves youth produced sexual imagery, staff will not view or forward sexual imagery reported to them and will follow the School's policy on the sharing of nudes and semi nudes as set out in the School's Safeguarding and Child Protection Policy.

11.4 Otherwise, in cases where the pupil's form/ class teachers believe that serious bullying behaviour has occurred involving a pupil or has recurred after warnings have been given to the "bully", they will refer the matter to a Vice Principal/Deputy Head Pastoral in each part of the school, as appropriate.

11.5 Where appropriate, the Pastoral Team will:

- interview the alleged victim, bully and any witnesses separately, in order to establish the facts of the case. He / she may decide to ask another member of staff to be present; and
- send a summary of their findings to the Deputy Head Pastoral or Vice Principal of that part of King's and, if relevant, other staff as appropriate.

11.6 Together the Principal and/or Vice Principal will decide on the action to be taken in accordance with this policy.

11.7 The parents of the victim and bully will be notified, giving them details of the case and details of next steps which may include further investigation and/or action in accordance with Whole School Behaviour Management Policy/Whole School Exclusion Removal and Review Policy; as relevant. Data Protection considerations mean that the School will be unlikely to share specific details of any sanctions issued with any parents/carers other than the child's.

12 Response to concerns

12.1 When a complaint of bullying behaviour is upheld, the range of responses may include one or more of the following:

- consideration as to whether the bullying incident should be addressed as a safeguarding concern and if so, the School's Safeguarding and Child Protection Policy will be followed;
- advice and support for the victim and, where appropriate, establishing a course of action to help the victim, including support from external services where appropriate;
- advice and support for the bully in trying to change their behaviour. This may include clear instructions and a warning or final warning;

- consideration of the motivation behind the bullying behaviour and whether external services should be used to tackle any underlying issues of the bully which contributed to the bullying behaviour. If these considerations give rise to safeguarding concerns relating to the bullying, guidance in The Whole School Safeguarding and Child Protection Policy will be followed;
- a supervised meeting between the bully and the victim to discuss their differences and the ways in which they may be able to avoid future conflict (only with the victim's express agreement);
- a disciplinary sanction against the bully, in accordance with the Whole School Behaviour Management Policy / Whole School Exclusion Removal and Review Policy; In a very serious case or a case of persistent bullying, a pupil may be required to leave the School permanently. Any disciplinary action will be applied fairly, consistently and reasonably, taking into account any special educational needs or disabilities and the needs of vulnerable pupils;
- action to break up a "power base" or areas where others feel uncomfortable;
- confiscation of mobile electronic devices, increased monitoring procedures or limiting access to the School's internet and email facilities if cyberbullying (see also the Whole School Digital Services Policy (including the Pupil and Staff Acceptable Use of ICT Agreement).);
- moving either the bully or victim to another House or Form/Tutor Group after consultation with the pupil, their parents and the relevant staff;
- involving Children's Social Care or the Police;
- notifying the parents of one or both pupils about the case and the steps that have been taken;
- and/or such other action as may appear to the Principal to be appropriate.

12.2 The position should be monitored for as long as necessary thereafter. Action may include:

- sharing information with some or all colleagues so that they may be alert to the need to monitor certain pupils closely;
- alerting specific pupils so that they may assist in monitoring and/or offering support;
- ongoing counselling and support;
- constant vigilance;
- mentioning the incident at meetings of staff;
- reviewing support for vulnerable individuals and reviewing sensitive areas of the School.

13 Supporting those severely impacted by bullying

13.1 The School recognises that removing bullied pupils from school is disruptive and can make it difficult to reintegrate. The School understands in some circumstances, however, the consequences of being bullied may have had a severe impact on a pupil's social, emotional or mental health and may have impacted seriously on a pupil's ability to learn.

13.2 The School will do all that is reasonably possible to ensure bullied pupils continue to attend school and maintain their educational progression by putting in place proportionate short term alternative on-site provision plans where necessary.

13.3 If the pupil is considered to have significantly greater difficulty learning than the majority of those the same age because of the impact of the bullying, the School will consider whether the pupil will benefit from being assessed for special educational needs.

14 Training

14.1 The School ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff and volunteers understand what is expected of them by this policy and have the necessary knowledge and skills to carry out their roles especially:

- having an understanding of the groups who may be more vulnerable to bullying;
- awareness of the risk and indications of bullying, and how to deal with cases;
- counselling skills (including bereavement);
- awareness of the risks of child-on-child abuse including sexual violence and sexual harassment and how bullying may give rise to safeguarding concerns.

The level and frequency of training depends on the role of the individual member of staff and written records of staff training are kept..

14.2 We emphasise with older pupils the role which is expected of them in setting a good example and being helpful to younger pupils and each other. This includes the appointment and training of pupils as Prefects and Peer Mentors and the operation of the House System; As part of the induction programme, expectations of behaviour will be shared with all pupils.

15 Risk assessment

15.1 Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed and appropriate action will be taken to reduce the risks identified.

15.2 The format of risk assessment may vary and may be included as part of the School's overall response to a welfare issue, including the use of individual pupil welfare plans (such as care, behaviour, healthcare and education plans, as appropriate). Regardless of the form used, the School's approach to promoting pupil welfare will be systematic and pupil focused.

15.3 The Principal and/ or Vice Principals or Deputy Head Pastoral have overall responsibility for ensuring that matters which affect pupil welfare are adequately risk assessed and for ensuring that the relevant findings are implemented, monitored and evaluated.

15.4 Day to day responsibility to carry out risk assessments under this policy will be delegated as appropriate to key pastoral staff of each part of the School who have been properly trained in, and tasked with, carrying out the particular assessment.

16 Record keeping and monitoring

16.1 All records created in accordance with this policy are managed in accordance with the School's policies that apply to the retention and destruction of records.

16.2 The Principal or Vice Principals will be made aware of all reported incidents of bullying, whether confirmed or otherwise through regular meetings.

16.3 Members of the Senior Management Team will address procedures for consideration of what can be learned from bullying incidents.

16.4 School staff maintain records of the welfare and development of individual pupils. Every complaint or report of bullying is recorded centrally and monitored to enable patterns to be identified, both in relation to individual pupils and across the school as a whole and to evaluate the effectiveness of the School's approach.

16.5 A centralised record of all allegations or reports of bullying, including details of those involved and the action taken will be recorded on CPOMS.

16.6 The Deputy Head Pastoral and/ or Head of EYFS, Head of Middle School (Year 7 and 8) and Head of Head of Upper School (Remove - Upper 5th), will monitor the centralised record of bullying incidents on a regular basis to identify patterns in behaviour and the effectiveness of the School's anti-bullying procedures.

16.7 The records created in accordance with this policy may contain personal data. The School has a number of privacy notices which explain how the School will use personal data about pupils and parents. The privacy notices are published on the School's website. In addition, staff must ensure that they follow the School's data protection policies and procedures when handling personal data created in connection with this policy. This includes the King's Rochester Data Protection Policy.

Appendix 1 Cyberbullying: Guidance for Pupils

Cyberbullying is bullying that takes place using technology. Pupils in Year 4 and above are required to bring a device to school for use in lessons. These pupils are given a clear set of rules to follow in their use of devices in school which are designed to reinforce the prevention of cyberbullying. There are also clear guidelines in place for the use of mobile devices.

Pupils should remember the following:

- use the security settings when using technology;
- regularly change your password and keep it private. If you are unsure the School offers guidance on keeping names, addresses, passwords, mobile phone numbers and other personal details safe at an age appropriate level;
- always respect others - be careful what you say online and what images you send;
- think before you send - whatever you send can be made public very quickly and could stay online forever;
- If you or someone you know is being cyberbullied, tell someone. You have the right not to be harassed or bullied online. Tell an adult you trust - your parents, any member of staff or volunteer, email the School's dedicated email address concerns@kings-rochester.co.uk or telephone a helpline such as ChildLine on 0800 1111;
- don't retaliate or reply online;
- save the evidence - learn how to keep records of offending messages, pictures or online conversations. Ask someone if you are unsure how to do this. This will help to show what is happening and can be used by the School to investigate the matter;
- block the bully. Most social media websites and online or mobile services allow you block someone who is behaving badly;
- don't do nothing - if you see cyberbullying going on, support the victim and report the bullying;
- the School blocks certain sites that are blocked by the filtering system and the ICT Services Department monitor pupils' use;
- the School may impose sanctions for the misuse, or attempted misuse of the internet;
- all School pupils from Year 3 are issued their own personal school email address;
- the School prohibits the use of cameras on mobile devices in washing and changing areas;
- the School prohibits the use of pupil's personal mobile devices whilst on site during the school day.

You may find the following websites helpful:

- <http://www.childnet.com/young-people>
- <https://www.thinkuknow.co.uk/>
- <https://www.childline.org.uk/Explore/Bullying/Pages/online-bullying.aspx>
- <https://www.saferinternet.org.uk/advice-centre/young-people>
- <https://www.disrespectnobody.co.uk/>
- <http://www.safetynetkids.org.uk/>
- <http://ceop.police.uk/>
- <http://www.antibullyingalliance.org.uk/>