POLICY · 2026–27

Anti-Bullying Policy

Including cyberbullying

Policy Statement

The purpose of this policy is:

- to help prevent bullying from happening to students in our care
- to make sure bullying is stopped as soon as possible if it does happen and that those involved receive the support they need
- to provide information to all staff, homestays, volunteers, students and their parents about what we should all do to prevent and deal with bullying.

WBS Guardians believes that:

- children and young people should never experience abuse of any kind;
- we have a responsibility to promote the welfare of all children and young people, to keep them safe and to practise in a way that protects them.

We recognise that:

- bullying causes real distress. It can affect a person's health and development and, at the extreme, can cause significant harm;
- all children, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, have the right to equal protection from all types of harm or abuse;
- everyone has a role to play in preventing all forms of bullying (including online) and putting a stop to it.

Contact Details

Nominated anti-bullying lead

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Designated lead for safeguarding and child protection

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Deputy Designated Safeguarding Lead (DDSL)

Name: Jennifer Britton, Co-founder and Director

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Policy

What is bullying?

Bullying may be repeated over time and intentionally hurts a student or group physically or emotionally and is often motivated by prejudice against particular groups, for example, on grounds of race, religion, culture, sex, gender, homophobia, special educational needs and disability, or because a child is adopted or is a carer. It may occur directly or through cyber-technology (social websites, mobile phones, text messages, photographs and email).

Keeping Children Safe in Education 2026 recognises that children may experience prejudice-based harm, including racism, faith-based prejudice and other forms of discrimination. WBS Guardians treats racist, faith-targeted and other discriminatory bullying (online or offline) as a safeguarding matter and will always challenge and address it.

Bullying includes a range of abusive behaviour that is:

- repeated;
- intended to hurt someone either physically or emotionally.

The NSPCC explains that bullying can take different forms. It could include:

- physical bullying: hitting, slapping or pushing someone;
- verbal bullying: name calling, gossiping or threatening someone;
- non-verbal abuse: hand signs or text messages;
- emotional abuse: threatening, intimidating or humiliating someone;
- exclusion: ignoring or isolating someone;
- undermining, constant criticism or spreading rumours;
- controlling or manipulating someone;
- making silent, hoax or abusive calls;
- racial, sexual or homophobic bullying (this is also a hate crime);
- bullying someone because they have a disability (this is also a hate crime).

The NSPCC explains that no single sign will indicate for certain that a child is being bullied, but watch out for:

- belongings getting 'lost' or damaged;
- physical injuries, such as unexplained bruises;
- being afraid to go to school, being mysteriously 'ill' each morning, or skipping school;
- not doing as well at school;
- asking for, or stealing, money (to give to whoever is bullying them);
- being nervous, losing confidence, or becoming distressed and withdrawn;
- problems with eating or sleeping;
- bullying others.

Who is at risk?

The NSPCC explain that any child can be bullied for any reason. If a child is seen as different in some way or seen as an easy target they can be more at risk.

This might be because of their:

- race or ethnic background
- gender
- sexual orientation.

Or it could be because they:

- appear anxious or have low self-esteem
- lack assertiveness
- are shy or introverted.

Popular or successful children are also bullied, sometimes because others are jealous of them. Sometimes a child's family circumstance or home life can be a reason for someone bullying them.

Disabled children can experience bullying because they seem an easy target and less able to defend themselves.

Further reading

Further information on bullying (including cyber-bullying) can be found on the NSPCC website https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/bullying-and-cyberbullying/

Prevention

WBS Guardians will seek to prevent bullying by:

- developing a code of behaviour that sets out how everyone involved in our organisation is expected to behave, in face-to-face contact and online, and within and outside of our activities;
- holding discussions with staff, homestays, volunteers and students in our care about bullying and how to prevent it. These discussions will focus on:
- group members' responsibilities to look after one another and uphold the behaviour code;
- practising skills such as listening to each other;
- respecting the fact that we are all different;
- making sure that no one is without friends;
- dealing with problems in a positive way;
- checking that our anti-bullying measures are working well.
- providing support and training for all staff, homestays and volunteers on dealing with all forms of bullying, including cyber bullying, racial, sexist, homophobic and sexual bullying;
- making sure our response to incidents of bullying takes into account:
- the needs of the person being bullied;
- the needs of the person displaying bullying behaviour;
- needs of any bystanders;
- our organisation as a whole.

- reviewing the plan developed to address any incidents of bullying at regular intervals, in order to ensure that the problem has been resolved in the long term;
- Making parents fully aware of our procedures by providing them with a copy of this policy.

Cyber Bullying

What is Cyber Bullying?

The NSPCC website explains that cyberbullying is bullying that takes place online. Unlike bullying offline, online bullying can follow the child wherever they go, via social networks, gaming and mobile phone and can include:

- sending threatening or abusive text messages
- creating and sharing embarrassing images or videos
- creating or sharing images or videos that have been digitally altered or generated using artificial intelligence (AI), sometimes called 'deepfakes'
- trolling – the sending of menacing or upsetting messages on social networks, chat rooms or online games
- excluding children from online games, activities or friendship groups
- shaming someone online
- setting up hate sites or groups about a particular child
- encouraging young people to self-harm
- voting for or against someone in an abusive poll
- creating fake accounts, hijacking or stealing online identities to embarrass a young person or cause trouble using their name
- sending explicit messages or nude and semi-nude images ('nudes')
- pressuring children into sending sexual images or engaging in sexual conversations.

Cyberbullying is just one type of online abuse. Further details on the different types and signs, as well as how to help keep students safe online can be found in our online safety policy.

Procedures

We will take seriously and investigate any bullying or cyber-bullying concerns that are reported to us:

- Students will be made aware that they can talk to their parents, teachers, homestay, or a member of WBS Guardians staff about any bullying concerns they may have;
- WBS Guardians staff member may receive a report of suspected online abuse from a student, parent or other source by face to face disclosure, email or telephone call. This disclosure will be recorded in writing by the member of staff (using the 'Tell Explain Describe' model if the information is being given by a student);
- Any concerns raised by a student, parent, homestay, member of staff or other source will be reported within 24 hours to Iain Howell, Designated Safeguarding Lead (DSL), or in their absence to Jennifer Britton, Co-founder and Director and Deputy Designated Safeguarding Lead (DDSL). The written record (see above) must be submitted at this time;
- The DSL will hold an emergency strategy meeting to discuss the incident, assess the alleged threat and risk to the student (including any relevant facts about the child which may affect their vulnerability including age and ability), implement an action plan and continue to review the situation until a resolution has been achieved. Written notes will be kept securely of this meeting by the DSL;

- The DSL will arrange for the young person to be helped and supported in recognition of the pressures (and possible vulnerabilities) they may have been under as a result of the suspected abuse;
- Any concerns that bullying (including cyber-bullying) has taken place at a student's school will be referred to the DSL of the school concerned;
- If the alleged bullying incident involves a member of the homestay family, or another student staying at the homestay, WBS Guardians will investigate fully as outlined above and, if necessary find alternative accommodation for the student;
- In most cases parents will be kept informed about the situation and the actions that WBS Guardians is taking unless there is good reason to believe that involving these parties would put the young person at risk of harm;
- We will support the victim and the perpetrator (if they are a student in our care) and monitor students well-being following a bullying incident for as long as necessary;
- Where there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm' due to bullying, we will refer the matter to local agencies;
- Please note that strong sanctions such as termination of our contract may be necessary in cases of severe and persistent bullying;
- Full records will be kept of any bullying concerns and of any actions taken. These will be held confidentially by Iain Howell, Designated Safeguarding Lead (DSL), and are accessible only to the DSL and DDSL. Whilst it is acknowledged that bullying may be repeated over time, we will take action in response to a single incident and make an appropriate record.

Specific cyber-bullying procedures in addition to the above

- In the case of cyber-bullying, support for the student could include helping them to understand how to recognise the early signs of online abuse, the wider issues and motivations of online abuse and making available relevant information and material. This help and support could be provided by accredited organisations such as the school, National Society for the Prevention of Cruelty to Children (NSPCC), Childline, National Crime Agency (NCA), Child Exploitation and Online Protection Centre (CEOP) websites and helplines;
- The DSL will ensure that viewing of any images or other content is only made where there are good and clear reasons to do so (unless unavoidable because the student has willingly shown a member of staff), basing incident decisions on what the DSL has been told about the content of any imagery or other content. The DSL will ensure that staff members do not search through devices and delete imagery unless there is a good and clear reason to do so. If the DSL feels that it is necessary to view any imagery, they will follow the guidance in the guidance Sharing nudes and semi-nudes: advice for education settings working with children and young people (publishing.service.gov.uk). This includes ensuring that there is another senior member of staff present, ideally of the same sex of the as the student in the images when the viewing takes place. (Section 2.10 of Sharing nudes and semi-nudes: advice for education settings working with children and young people explains the procedure to follow if it is felt that there is a clear reason to view such imagery);
- The DSL will consider the need to ask for the student to produce the device as evidence. The viewing of any images, other content or seizing of any devices will be recorded including those present, date and time;
- The incident will be referred to a statutory agency (Children's Services on the Local Authority telephone number or the police by dialling 101) immediately if there is a concern a young person has been harmed or is at immediate risk of harm (telephone the police by dialling 999). This would include information coming to light if at the initial stage:
  - The incident involves an adult;

- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs);
- What you know about any imagery or other content suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent;
- Any imagery or other content involves sexual acts and any pupil in the imagery is under 13;
- You have reason to believe a student is at immediate risk of harm owing to the sharing of any imagery, for example, the young person is presenting as suicidal or self-harming;
- Where the material or activities found or suspected are illegal and there is no immediate risk to the child, the Child Exploitation and Online Protection command (CEOP) of the National Crime Agency should be informed;
- If none of the above apply, the DSL may decide (with input from key stakeholders if appropriate) to respond to the incident without involving the police or children's social care. The DSL can choose to escalate the incident at any time if further information/concerns come to light. The decision should be recorded in line with the Safeguarding Policy and Child Protection Policy, and regularly reviewed throughout the process of responding to the incident;
- The decision to respond to the incident without involving the police or children's social care would be made in cases when the DSL is confident that they have enough information to assess the risks to pupils involved, and the risks can be managed within WBS Guardians support framework and network for the child.

- If the DSL has decided that other agencies do not need to be involved, then consideration should be given to deleting any imagery or other content to limit any further sharing. In most cases, children and young people should be asked to delete any imagery or content and to confirm that they have deleted them. They should be given a deadline for deletion across all devices, online storage or social media sites. They should be reminded that possession of nudes and semi-nudes is illegal (if this is what the issue was). They should be informed that if they refuse or it is later discovered they did not delete such imagery, they are continuing to commit a criminal offence and the police may become involved. A record will be made of these decisions as per the Safeguarding Policy including decisions, times, dates and reasons.
- Any decision to search a child or young person's device and delete imagery will be based on the professional judgement of the DSL (or DDSL) and will always comply with the safeguarding and child protection policy and procedures of WBS Guardians. All of these decisions need to be recorded, including times, dates and reasons for decisions made and logged in the safeguarding records. Parents and carers will also be informed unless this presents a further risk to any child or the young person;
- Where the DSL is aware that nude or semi-nude imagery or other content has been unavoidably viewed by a member of staff, the DSL should ensure that the staff member has appropriate support. Viewing such imagery or other content can be distressing for both young people and adults and appropriate emotional support may be required;
- Where police action has been instigated for an incident involving a member of staff or volunteer, WBS Guardians internal procedures will take place at the conclusion of the police action. A suspension will be likely to take place before the internal procedures begin.

Responding to an incident of the sharing of nudes and semi-nude imagery

- WBS Guardians will follow the guidance in https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people when responding to an incident of sharing nudes and semi-nudes.

Related policies and procedures

This policy statement should be read alongside our organisational policies and procedures including:

- Safeguarding and Child Protection policy
- Code of conduct for staff, homestays and volunteers
- Student behaviour code of conduct
- Online Safety Policy

Review

We are committed to reviewing our policy and good practice annually.

This policy was last reviewed on: 16/11/2026. Next review: September 2027.

Signed: Iain Howell, CEO and DSL

Date: 28/09/2026

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