



**The
Sunnywood
Project**

Anti-Bullying Policy

Effective: 25/08/2024

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Statement of intent

The Sunnywood Project (TSP) believes that everyone should have access to a safe and supportive environment; this means being free from all forms of bullying behaviour. This policy outlines how instances of bullying are dealt with, including the procedures to prevent occurrences of bullying.

Although explicit attention is given to handling instances of bullying between and involving children and young people, TSP is adamant no adult should encounter bullying within the organisation's projects, activities, and events.

These strategies (e.g. modelling tolerance and supporting/engaging with difference as a core value) aim to promote an inclusive, tolerant, and supportive environment within the organisation, and across our communities.

All staff, volunteers, participants, and the parents/carers of child participants will work together to prevent and reduce any instances of bullying at the organisation. There is a zero-tolerance policy for bullying at TSP.

1. Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- Equality Act 2010
- Protection from Harassment Act 1997
- Malicious Communications Act 1988
- Public Order Act 1986
- Communications Act 2003
- Human Rights Act 1998
- Crime and Disorder Act 1998
- DfE (2024) 'Working together to safeguard children'
- DfE (2024) 'Information sharing'
- Department for Science, Innovation and Technology, and UK Council for Internet Safety (2024) 'Sharing nudes and semi-nudes: how to respond to an incident (overview)'
- Department for Science, Innovation and Technology, and UK Council for Internet Safety (2024) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'

This policy operates in conjunction with the following policies:

- Relevant provision code of conduct
- Child Protection and Safeguarding Policy
- Safeguarding Vulnerable Adults Policy
- Child-on-Child Abuse Policy
- Event Terms and Conditions, specifically Section 7. Fair Treatment of Others

2. Definitions

For the purpose of this policy, “bullying” is defined as persistent behaviour by an individual or group with the intention of verbally, physically, or emotionally harming another person or group. Bullying is generally characterised by:

- **Repetition:** Incidents are not one-offs; they are frequent and happen over an extended period of time.
- **Intent:** The perpetrator means to cause verbal, physical or emotional harm; it is not accidental.
- **Targeting:** Bullying is generally targeted at a specific individual or group.
- **Power imbalance:** Whether real or perceived, bullying is generally based on unequal power relations.

Vulnerable individuals are more likely to be the targets of bullying due to the attitudes and behaviours some people have towards those who are different from themselves. Vulnerable individuals may include, but are not limited to:

- Children and young people who are adopted.
- Individuals suffering from a health problem.
- Children or young people with caring responsibilities.
- Individuals from socioeconomically disadvantaged backgrounds.

Individuals with certain characteristics are also more likely to be targets of bullying, including, but not limited to:

- Those who are LGBTQ+, or perceived to be LGBTQ+.
- Black, Asian, and minority ethnic (BAME) pupils.
- Those with disabilities.

3. Types of bullying

Many kinds of behaviour can be considered bullying, and bullying can be related to almost anything. Teasing another individual because of their appearance, religion, ethnicity, gender, sexual orientation, home life, culture, or disabilities are some of the types of bullying that can occur.

Bullying is acted out through the following mediums:

- Verbal
- Physical
- Emotional
- Online (cyberbullying)

Racist bullying: Bullying another person based on their ethnic background or skin colour. Racist bullying is a criminal offence under the Crime and Disorder Act 1998 and Public Order Act 1986.

Homophobic and biphobic bullying: Bullying another person because of their actual or perceived sexual orientation.

Transphobic bullying: Bullying based on another person's gender identity or gender presentation, or for not conforming to dominant gender roles.

Sexist bullying: Bullying based on sexist attitudes expressed in a way to demean, intimidate or harm another person because of their sex or gender. Sexist bullying may sometimes be characterised by inappropriate sexual behaviours.

Sexual bullying: Bullying behaviour that has a physical, psychological, verbal or non-verbal sexual dimension or dynamic that subordinates, humiliates or intimidates another person. This is commonly underpinned by sexist attitudes or gender stereotypes.

Ableist bullying: Bullying behaviour that focusses on another person's disability or support needs; this can include mocking the individual's disability or their needs, using derogatory words or slurs in relation to an individual's disability, or deliberately excluding an individual because of their disability.

Prejudicial bullying: Bullying based on prejudices directed towards specific characteristics or experiences, e.g. religion or mental health issues.

Relational bullying: Bullying that primarily constitutes of excluding, isolating and ostracising someone – usually through verbal and emotional bullying.

Socioeconomic bullying: Bullying based on prejudices against the perceived social status of the victim, including, but not limited to, their economic status, their parents' occupations, their health or nutrition level, or the perceived "quality" of their clothing or belongings.

4. Roles and responsibilities

The **Board of Trustees** is responsible for:

- Evaluating and reviewing this policy to ensure that it does not discriminate against any individual on the basis of their protected characteristics or backgrounds.
- Appointing a safeguarding link Trustee who will work with the DSL to ensure the policies and practices relating to safeguarding are being implemented effectively.

The **Directors** are responsible for:

- Analysing any bullying data to establish patterns and reviewing this policy in light of these.
- Ensuring the DSL has the appropriate status and authority within the organisation to carry out the duties of the role.
- Ensuring that the organisation adopts a tolerant and open-minded policy towards difference.
- Ensuring TSP is inclusive.
- The overall implementation and monitoring of this policy.
- Reviewing and amending this policy, accounting for new legislation and government guidance, and using staff and volunteer experience of dealing with bullying incidents in previous years to improve procedures.
- Keeping a *Bullying Report Form* of all reported incidents, including which type of bullying has occurred, to allow for proper analysis of the data collected.
- Analysing the data in the bullying record at regular intervals to identify trends, so that appropriate measures to tackle them can be implemented.
- Arranging appropriate training for staff members and volunteers.

Staff and volunteers working directly with young people and children are responsible for:

- Corresponding and meeting with parents/carers where necessary to tackle bullying.
- Providing a point of contact for children and young people, and their parents/carers when more serious bullying incidents occur.
- Being alert to social dynamics during their projects, activities, or events.
- Being available for children who wish to report bullying.
- Providing follow-up support after bullying incidents.
- Being alert to possible bullying situations, particularly exclusion from friendship groups, and informing the Directors or DSL of such observations.
- Refraining from stereotyping when dealing with bullying.
- Understanding the composition of groups, showing sensitivity to those who have been the victims of bullying.
- Reporting any instances of bullying once they have been approached by a child for support.

Parents/carers of child participants are responsible for:

- Informing staff or volunteers if they have any concerns that their child is the victim of bullying or involved in bullying in any way.
- Being watchful of their child's behaviour, attitude and characteristics and informing the relevant staff members or volunteers of any changes.

All staff and volunteers are responsible for:

- Maintaining an awareness that bullying can be experienced and carried out by individuals from of any age, not just children or young people.
- Supporting any individual who may be experiencing bullying during TSP projects, activities, or events.
- Where safe and appropriate to do so, challenging potential bullying behaviour.
- Reporting all concerns to Directors, Persons in Charge (PiC) if on event/activity, and the DSL if the situation involves a child or young person.
- Ensuring their words and behaviours model an inclusive and welcoming environment in line with TSP aims, objectives, and values.

All participants, regardless of age, are responsible for:

- Informing a member of staff or volunteer if they witness bullying or are a victim of bullying.
- Not making counter-threats if they are victims of bullying.
- Walking away from dangerous situations and avoiding involving other participants in incidents.
- Treating one another with due respect and regard.

5. Statutory implications

TSP understands that, under the Equality Act 2010, it has a responsibility to:

- Eliminate unlawful discrimination, harassment, including sexual harassment, victimisation and any other conduct prohibited by the act.
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it.
- Foster good relations between people who share a protected characteristic and people who do not share it.

The organisation understands that, under the Human Rights Act (HRA) 1998, it could have charges brought against it if it allows the rights of individuals, particularly children and young people, to be breached by failing to take bullying seriously. The Directors will ensure that this policy complies with the HRA; the Directors understands that they cannot do this without fully involving staff, volunteers, and the wider TSP community.

Although bullying itself is not a criminal offence, some types of harassment, threatening behaviour and/or communications may be considered criminal offences:

- Under the Malicious Communications Act 1988, it is an offence for a person to electronically communicate with another person with the intent to cause distress or anxiety, or in a way which conveys a message which is indecent or grossly offensive, a threat, or contains information which is false and known or believed to be false by the sender.
- The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct amounting to harassment.
- Section 127 of the Communications Act 2003 makes it an offence to send, by means of a public electronic communications network, a message, or other matter, that is grossly offensive or of an indecent, obscene or menacing character. It is unlawful to disseminate defamatory information through any media, including internet sites.
- Other forms of bullying which are illegal and should be reported to the police include violence or assault, theft, repeated harassment or intimidation, and hate crimes.

6. Prevention

TSP has a clear commitment to promoting compassion, kindness, and a positive society; a further core ethos is supporting individuals to develop social skills and self-regulation of emotion, whilst enabling people to participate in society as mature, independent, and responsible individuals. As such, there is no place for bullying within the organisation and TSP's clear set of values and standards are regularly promoted across the organisation's projects, events, and activities.

All members of staff and volunteers will be made aware of this policy and their responsibilities in relation to it.

The organisation will be alert to, and, where possible, account for any mental health and wellbeing issues amongst participants, particularly child participants, as these can be a cause, or a result, of bullying behaviour.

Where safe and appropriate to do so, TSP will ensure potential perpetrators are given support as required as the motivations and reasons behind bullying are often complex and part of a wider array of issues.

7. Signs of bullying

TSP recognises it can be difficult to spot the signs of bullying, especially where it is being experienced by adults. However, staff and volunteers will be alert to the following signs that may indicate a participant is a victim of bullying:

- Being frightened to engage in projects, events, or activities where another individual is also engaged
- Unwillingness to attend projects, events, or activities altogether
- Becoming anxious or lacking confidence
- Saying that they feel ill repeatedly
- Missing possessions
- Asking for money or stealing
- Cuts or bruises
- Lack of appetite
- Unwillingness to use the internet or mobile devices
- Lack of eye contact
- Becoming short tempered
- Change in behaviour and attitude

Although the signs outlined above may not be due to bullying, they may be due to deeper social, emotional or mental health issues, so are still worth investigating. As a number of these signs overlap with indicators of safeguarding concerns, child participants who display a significant number of these signs will be approached by a member of staff or volunteer to determine the underlying issues causing this behaviour. Where these signs are present in adult participants, staff and volunteers are to, as best they can, create a safe, accepting space within which support can be accessed at the individual's discretion.

Staff and volunteers will be aware of the potential factors that may indicate a participant is likely to exhibit bullying behaviours, including, but not limited to, the following:

- They have experienced mental health problems, which have led to them becoming more easily aggravated
- They have been the victim of abuse
- They are showing signs of stress

If staff or volunteers become aware of any factors that could lead to bullying behaviours and have concerns, they will notify the PiC, Directors, or DSL, whoever is most appropriate for the individual concerned, who will support any necessary investigation into the matter and monitor the situation.

8. Staff and volunteer principles

TSP will ensure that prevention is a prominent aspect of its anti-bullying vision.

Staff and volunteers will treat reports of bullying seriously and will not ignore signs of suspected bullying. Staff and volunteers will act immediately when they become aware of a bullying incident. Unpleasantness from one participant towards another will always be challenged and will never be ignored.

Staff and volunteers will always respect individuals' privacy, and information about specific instances of bullying is not discussed with others, unless the individual has given consent, or there is a safeguarding concern. If a member of staff or volunteer believes a child or vulnerable adult is in danger, e.g. of being hurt, they will inform the DSL immediately. Where there is concern an adult is in danger, e.g. of being hurt, staff and volunteers will sensitively support the individual and advise that they contact the police.

Where bullying takes place between child or vulnerable adult participants and they continue to be engaged in TSP projects, events, or activities, follow-up support will be given to both the victim and perpetrator following an incident to ensure all bullying has stopped. Where bullying takes place between adult participants who are not considered vulnerable, both victim and perpetrator will be offered support as appropriate and desired.

Continued inappropriate or bullying behaviours by any participant, child or adult, may result in the Board of Trustees and Directors considering a ban.

Where there is evidence that staff and volunteers are exhibiting bullying behaviours, the matter will be escalated to the Directors immediately.

9. Child-on-child abuse

TSP has a zero-tolerance approach to all forms of child-on-child abuse, including sexual harassment and sexual violence.

All staff and volunteers working directly with children or young people will:

- Be aware that child participants of any age and gender are capable of abusing their peers.
- Be aware that abuse can occur inside and outside of organisational settings or activities.
- Be aware of the scale of harassment or abuse, and that just because it is not being reported does not mean it is not happening.
- Take all instances of child-on-child abuse equally seriously regardless of the characteristics of the perpetrators or victims.
- Never tolerate abuse as “banter” or “part of growing up”, and will never justify sexual harassment, e.g. as “boys being boys”, as this can foster a culture of unacceptable behaviours and one that risks normalising abuse.
- Be aware that child-on-child abuse can be manifested in many ways, including sexting, sexual harassment and assault, and hazing or initiation-type violence.
- Always challenge any harmful physical behaviour that is sexual in nature, such as inappropriate touching. Dismissing or tolerating such behaviours risks normalisation.

Sexual harassment in particular can take many forms, including but not limited to:

- Telling sexual stories, making sexual remarks, or calling someone sexualised names.
- Sexual “jokes” or taunting.
- Deliberately brushing against someone.
- Displaying images or video of a sexual nature.
- Upskirting (this is a criminal offence).
- Online sexual harassment.

This policy will be available for participants; through it, they will have an awareness of how to raise concerns or make a report and how any reports will be handled – this includes the process for reporting concerns about friends or peers. If a child has been harmed, is in immediate danger or is at risk of harm, a referral may be made to children’s social care services (CSCS) and potentially the police, where the DSL deems this appropriate in the circumstances. Similar concerns involving vulnerable adults will be escalated according to the *Safeguarding Vulnerable Adults Policy*.

All staff and volunteers will be aware and sensitive towards the fact that children may not be ready or know how to tell someone that they are being abused. Children being abused may feel embarrassed, humiliated, scared, or threatened.

TSP’s *Child-on-Child Abuse Policy* outlines the organisation’s stance on addressing child-on-child abuse, including sexual abuse, and the procedures in place will be adhered to if any instances are uncovered or disclosed. More information on the approach to preventing and

managing instances of peer-on-peer abuse can be found within this policy and the *Child Protection and Safeguarding Policy*.

10. Support

In the event of bullying, victims will be offered the following support:

- Emotional support and reassurance from staff and volunteers
- Reassurance that it was right to report the incident and that appropriate action will be taken
- If a child, liaison with their parents/carers to ensure a continuous dialogue of support
- Advice not to retaliate or reply
- Discussion on whether police action is required (except in serious cases of child exploitation or abuse where the police may be contacted without discussion with parents)

The Directors, or PiC if on event, will carefully consider in each instance of bullying that is handled whether it is appropriate to split up the victim(s) and perpetrator(s).

11. Record keeping

The DSL will ensure that robust records are kept regarding all reported or otherwise uncovered incidents of bullying involving child participants or vulnerable adults – this includes recording where decisions have been made, e.g. support, escalation of a situation and resolutions.

The Directors will keep a record of reported or otherwise uncovered incidents of bullying involving other participants.

In both instances, the Directors and DSL will ensure that all decisions and actions recorded are reviewed on a regular basis for the purposes of:

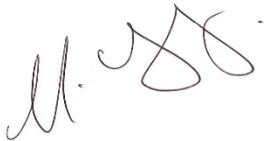
- Identifying patterns of concerning, problematic or inappropriate behaviour on the part of certain individuals.
- Reflecting on whether cases could have been handled better and using these reflections to inform future practice.
- Considering whether there are wider cultural issues at play and planning to mitigate this.
- Considering whether prevention strategies could be strengthened based on any patterns in the cases that arise.
- Responding to any complaints about how cases have been handled.

12. Monitoring and review

This policy is reviewed every **two years** by the Directors and the DSL. Any changes to this policy will be communicated to all relevant stakeholders.

The scheduled review date for this policy is **25/08/26**.

Signatory: Marc Young, Director of Education and Youth Service



Signatory: Samantha Deas, Creative Director and Family Engagement Coordinator (DDSL)



Signatory: Steven Ticehurst, DofE (LO) and Operations Manager (DSL)



Incident details

When did the incident occur?

Who has been suspected of bullying?

Did anyone else see the incident?

According to the victim, how often does the bullying take place?

According to the victim, how long has the bullying been going on?

What does the victim feel needs to happen next?