



Anti-Bullying Policy

Wayland Stables Care Farm

Policy owner: Jake Payne, Business Manager

Approval date: 05/08/2026

Effective date: 01/09/2026

Next review: August 2027, or sooner if guidance or risk changes

Guidance status: Keeping Children Safe in Education (KCSIE) 2025 remains the operative statutory guidance until 31 August 2026. KCSIE 2026 takes effect on 1 September 2026. This policy has been prepared to the 2026 standard; until that date it must be read with KCSIE 2025. The Designated Safeguarding Lead (DSL) will complete and record an implementation check on or after 1 September 2026.

1. Policy statement

Wayland Stables Care Farm (WSCF) is committed to a safe, respectful and inclusive environment in which every child can learn, participate and develop without fear of bullying, harassment, abuse or retaliation. Bullying is unacceptable. Reports will be listened to, recorded, assessed promptly and acted on proportionately.

WSCF recognises that children with special educational needs and disabilities (SEND), communication differences, medical needs or previous trauma may face additional risks and barriers to reporting. Staff will adapt communication, seek the child's views and provide reasonable adjustments without lowering expectations for safety.

Safeguarding principle: Bullying can be a form of child-on-child abuse. A behaviour does not have to be repeated or meet the definition of bullying before WSCF acts to protect a child.

2. Scope and relationship with other procedures

This policy applies to:

1. all children and young people under 18 who attend, visit or receive education, support, outreach, transport, off-site activity or work-related learning through WSCF;
2. staff, volunteers, agency workers, contractors, visitors, parents and carers when their conduct affects a child, a member of staff or the safe operation of WSCF; and

3. behaviour on site, during transport, trips, placements, remote learning and online, and behaviour outside WSCF where there is a clear effect on safety, wellbeing, relationships or participation at WSCF.

The main investigation procedure in this policy is for concerns between children. Adult-to-child conduct is considered under the Safeguarding and Child Protection Policy, staff code of conduct and allegations/low-level concerns procedure. Bullying or harassment of staff is addressed through the relevant grievance, dignity at work, disciplinary, complaints, parent/visitor conduct, health and safety or police procedure. Where an adult participant is involved, the Adult Safeguarding Policy also applies. A mixed-age incident may require both child and adult safeguarding action.

This policy should be read with the Safeguarding and Child Protection Policy, Behaviour Policy, Online Safety/Acceptable Use arrangements, Mobile Phone, Smoking and Vaping Policy, SEND Policy, complaints procedure, staff code of conduct, whistleblowing procedure and data protection/record-retention arrangements.

3. Legal and guidance framework

WSCF has considered the following law and national guidance, applying each duty to the extent that it applies to the setting and the education commissioned or delivered:

4. Education and Inspections Act 2006, including school behaviour measures and powers relating to conduct outside school where applicable;
5. Education Act 2002, Children Acts 1989 and 2004, and the safeguarding duties reflected in KCSIE;
6. Equality Act 2010, including duties relating to discrimination, harassment, victimisation, reasonable adjustments and the Public Sector Equality Duty where applicable;
7. Children and Families Act 2014 and SEND Code of Practice: 0 to 25 years;
8. Human Rights Act 1998, data protection law and relevant criminal law;
9. Working Together to Safeguard Children 2026;
10. KCSIE 2025 and KCSIE 2026 from 1 September 2026;
11. DfE Preventing and Tackling Bullying, Behaviour in Schools, current suspension and permanent exclusion guidance, and July 2026 guidance on bullying and harassment of school staff;
12. Prevent duty guidance 2023; and
13. Ofsted school inspection materials currently in use and those applying from September 2026, where applicable.

4. Definitions

4.1 Bullying

For this policy, bullying is behaviour by an individual or group, usually repeated over time, that intentionally hurts, intimidates, humiliates, isolates or controls another person. It commonly involves a real or perceived imbalance of power. Power may arise from physical strength, age, group size, popularity, access to information or technology, social status, disability, communication need or another vulnerability.

Online, a single post, image, message or recording can have a repeated and continuing effect because it can be copied, shared, altered, searched for or viewed by many people. WSCF may therefore treat the continuing impact as bullying even where the original upload happened once.

4.2 Harmful behaviour that is not repeated

A one-off assault, threat, discriminatory incident, sexual comment, sharing of an image, coercive act or other harmful behaviour may not fit the narrow definition of bullying. It is still unacceptable and will be addressed under this policy, the Behaviour Policy and/or safeguarding procedures. Harassment, sexual harassment and child-on-child abuse do not need to be repeated before action is required.

4.3 Language used in records

During an assessment, records should normally use neutral terms such as "child who reported harm" and "child alleged to have caused harm". Labels such as "bully" or "victim" must not replace a careful assessment of what happened, the impact, the context and the needs of every child involved.

5. Forms of bullying and harmful behaviour

Bullying or related harmful behaviour can be direct, indirect, face-to-face or online. It includes, but is not limited to:

14. **Physical:** hitting, kicking, biting, pushing, spitting, restraint, intimidation, damaging property, taking possessions or blocking access.
15. **Verbal:** name-calling, threats, mocking, abusive language, repeated criticism, rumours, imitation of speech or communication, and comments intended to shame or frighten.
16. **Relational or social:** deliberate exclusion, coercing others to exclude, public humiliation, manipulating friendships, spreading rumours or isolating someone from activities or support.
17. **Prejudice-based or discriminatory:** conduct linked to actual or perceived disability, race, ethnicity, nationality, religion or belief, sex, sexual orientation, gender reassignment, pregnancy or maternity, or association with someone who has a protected characteristic. It also includes hostility linked to care status, family circumstances, poverty, appearance, health, communication, gender non-conformity or another difference.
18. **SEND-related:** exploiting communication, sensory, cognitive or physical differences; removing aids; deliberately triggering distress; mocking reasonable adjustments; or treating distress or disability-related behaviour as entertainment.
19. **Sexual, sexist or misogynistic/misandrist:** sexual comments or jokes, unwanted touching, sexualised rumours, rating bodies, upskirting, coercion, harmful sexual behaviour, sexual violence or harassment. Such conduct is never dismissed as banter, flirting, "boys being boys" or part of growing up.
20. **Online and technology-assisted:** abusive or exclusionary messages, impersonation, doxxing, pile-ons, unwanted group additions, gaming abuse, altered media, deepfakes, AI-generated humiliating or sexualised content, and creating, requesting, threatening to share or sharing nude or semi-nude images.

21. **Property, money or access:** theft, extortion, damaging work or belongings, withholding food or equipment, or using access to activities, transport or online spaces to control another person.
22. **Initiation or hazing:** activities intended to humiliate, test loyalty, cause pain or pressure someone to take risks.
23. **Retaliation:** threatening, excluding or disadvantaging someone because they reported, supported a report or participated in an investigation.

6. Equality, inclusion and vulnerability

WSCF will act on all bullying and will record prejudice-based and discriminatory elements accurately. Staff do not need to decide whether conduct meets a legal definition before stopping it, supporting the child and reporting it.

When assessing risk and response, staff will consider:

24. the child's age, development, communication and understanding;
25. SEND, disability, health needs and reasonable adjustments;
26. care experience, young-carer status, family circumstances, social isolation and attendance;
27. whether the child is questioning gender or is perceived not to conform to gender stereotypes, while continuing to apply all safeguarding and site policies consistently;
28. whether racism, antisemitism, anti-Muslim hostility, homophobia, biphobia, transphobia, sexism, misogyny/misandry, faith-based prejudice or extremist ideology is present;
29. the power imbalance, group dynamics, coercion, exploitation and risk of retaliation; and
30. whether several apparently minor incidents form a pattern across locations, staff teams, online spaces or commissioning settings.

Any report involving a child with SEND requires close liaison between the DSL and the person with oversight of SEND, with communication support and extra pastoral attention where appropriate. Disability-related behaviour may require reasonable adjustments and support; it does not remove the duty to keep others safe.

7. Prevention

WSCF will maintain a whole-setting approach that includes:

31. **Culture and leadership:** clear expectations, visible adult modelling, prompt challenge to discriminatory or sexualised language, and an attitude that harm could happen here even when no reports have been made.
32. **Education:** age- and development-appropriate teaching through PSHE/RSHE, online safety, relationships work, farm activities and daily practice on consent, boundaries, respectful disagreement, bystander action and help-seeking.
33. **Accessible reporting:** more than one trusted route, including verbal, written, visual or supported communication, regular check-ins and opportunities to speak without peers present.

34. **Supervision and environment:** reviewing transition times, transport, secluded areas, toilets/changing arrangements, animal-care areas, entrances, placements and other identified hotspots without using surveillance in private areas.
35. **Online safety:** appropriate filtering and monitoring of WSCF systems, annual documented review, age-appropriate controls, staff training and action on AI-generated or manipulated content. The site's no-personal-phone rule supports but does not replace online-safety duties.
36. **Staff competence:** induction and at least annual refreshers on bullying, child-on-child abuse, SEND barriers, discrimination, sexual harassment, online evidence and reporting routes.
37. **Partnership:** working with families, commissioning schools, transport providers, placements and local safeguarding partners so that gaps between settings do not leave a child unsafe.
38. **Pupil voice and review:** checking whether children feel safe, know how to report and believe adults will act; using the findings to improve supervision, teaching and policy.

8. Reporting concerns

8.1 Children

A child may tell any member of staff or use an agreed communication method. They may report something that happened to them or another person. They do not need proof and do not need to use the word "bullying". Staff will not require children to confront each other or make a public report.

8.2 Staff, volunteers, visitors and families

Any adult who sees, hears about or suspects bullying or related harm must act promptly: make the situation safe, report to the designated lead for the session and record the concern before the end of the working day. A safeguarding concern must be reported to the DSL immediately. Parents and carers may report verbally or in writing to any senior member of staff.

8.3 Confidentiality and anonymous reports

Reports are handled sensitively on a need-to-know basis. Staff must never promise absolute confidentiality. The child's wishes and feelings will be considered, but information may be shared without consent where necessary to protect the child or another person. Anonymous reports are considered and investigated as far as the available information allows.

A report made honestly is not misconduct merely because it cannot be substantiated. Any concern about deliberate fabrication will be assessed carefully and must never be used to discourage reporting.

9. Immediate staff response

39. **Make safe.** Stop the behaviour if it is safe to do so, separate children where necessary, obtain first aid and call 999 if there is immediate danger or a serious crime in progress.
40. **Listen.** Use the child's own communication method, remain calm, take them seriously, avoid blame and do not ask leading or repeated questions.

41. **Reassure.** Explain that reporting was the right thing to do, they are not in trouble and the concern will be shared only with people who need to help.
42. **Preserve, do not investigate unlawfully.** Record basic details and retain available lawful evidence. Do not ask a child to forward harmful material. Never view, copy, print, save or share a nude or semi-nude image of a child. Do not use a personal device to capture evidence.
43. **Report.** Notify the session lead and DSL immediately where safeguarding may be involved. Do not delay a police or safeguarding report while trying to gather more evidence.
44. **Record.** Before the end of the working day, record the child's words, date, time, location, witnesses, immediate action, injuries, online details and who was informed. Separate fact, observation and professional opinion.

10. Triage, safeguarding and referral

The DSL or delegated senior lead will decide the route promptly. The assessment will consider:

45. immediate and continuing safety, medical need and risk of retaliation;
46. whether the behaviour is repeated, escalating, discriminatory, sexual, coercive, exploitative, online or potentially criminal;
47. the ages, development, needs, vulnerabilities and power relationship of the children;
48. the wishes and feelings of the child who reported harm, while recognising that these cannot override the duty to protect;
49. risks to siblings, peers, staff or people in other settings;
50. whether a risk assessment or written safety plan is required; and
51. whether to consult or refer to the commissioning school, children's social care, police, health services, Prevent/Channel or another specialist service.

Child-on-child sexual harassment, harmful sexual behaviour or sexual violence is managed under the Safeguarding and Child Protection Policy and KCSIE Part five. All incidents involving the making or sharing of nude or semi-nude images require a safeguarding response, whether described as consensual or non-consensual and whether real, altered or generated using AI.

Where a concern involves an adult working with children, staff must use the allegations/low-level concerns route. Concerns about the head or most senior person must go to the person identified in the Safeguarding and Child Protection Policy, not to the subject of the concern. The DSL or senior leader will seek local authority designated officer advice where the harm threshold may be met.

11. Assessment and investigation

The lead will plan a proportionate, timely and impartial assessment. Safeguarding and police enquiries take priority over an internal investigation. WSCF will consult relevant agencies before actions that might compromise evidence or increase risk.

52. Children are spoken with separately, using suitable communication support and as few interviews as possible.
53. Written and digital evidence is secured lawfully; only authorised staff access it, and illegal sexual imagery is not viewed or copied.
54. The lead checks earlier records, attendance, wellbeing, locations and other settings for patterns.
55. Parents/carers are informed promptly unless doing so would increase risk, prejudice a safeguarding/police enquiry or conflict with professional advice. Reasons for delaying or withholding notification are recorded.
56. The child who reported harm is told, in age-appropriate terms, what will happen next and later whether action has been taken, without disclosing another child's confidential information.
57. Findings, decisions, referral advice, risk controls and the rationale are recorded. The balance of probabilities may be used for internal behaviour decisions; this does not determine criminal liability.

Restorative work or mediation is never automatic. It may be offered only after risk assessment, when participation is voluntary and informed, the child who was harmed feels safe, and it does not replace safeguarding action or an appropriate consequence. It will not be used to require a child to meet someone they fear or to negotiate away sexual, discriminatory or abusive harm.

12. Outcomes, consequences and support

12.1 Protecting and supporting the child who experienced harm

58. an immediate safety plan, named trusted adult and agreed check-ins;
59. changes to supervision, seating, transport, groups, timetable or location that do not unfairly burden or isolate the child who reported harm;
60. communication support, reasonable adjustments, pastoral or therapeutic input and referral to specialist services;
61. support with attendance, learning, online content removal and safe re-engagement; and
62. regular review with the child and family until the risk and impact have reduced.

12.2 Supporting the child who caused or may have caused harm

63. clear boundaries and proportionate supervision;
64. a behaviour, safety or risk-management plan;
65. teaching and support addressing empathy, consent, prejudice, online behaviour, emotional regulation or unmet need;
66. assessment of whether the child may also have experienced abuse, trauma, exploitation or unmet SEND/mental-health need; and
67. family and multi-agency work where appropriate.

12.3 Consequences

Consequences are consistent with the Behaviour Policy, proportionate to seriousness and impact, and combined with work to prevent recurrence. They may include a clear direction to stop, repair of damage, loss of a relevant privilege, increased supervision, an individual behaviour plan, removal from an activity, or referral back to the commissioning school.

Any suspension or permanent exclusion must be taken only by the person or body legally authorised to do so and in line with the statutory guidance in force. Permanent exclusion is a last resort. Decisions must consider safeguarding, SEND, disability, reasonable adjustments, equality, proportionality and whether support or early intervention could address the risk. Safety planning may require children to be kept apart while enquiries continue; this is not, by itself, a finding of guilt.

13. Online incidents and harmful content

WSCF will respond where online behaviour affects a child or the safe operation of the setting, even if it started off site or outside normal hours. Staff will:

68. prioritise the child's immediate safety and emotional wellbeing;
69. record the platform, account, date/time, URL or message context where this can be done without copying illegal or unnecessary content;
70. use platform reporting, trusted flagger or specialist routes as appropriate and support the family with removal requests;
71. consider impersonation, doxxing, deepfakes, AI-generated material, coordinated harassment and the risk that content will spread;
72. refer suspected crimes or child sexual abuse material through safeguarding and police/CEOP routes as advised; and
73. review filtering, monitoring, staff training and curriculum after serious or repeated incidents.

Personal phones and smart devices are controlled by the WSCF Mobile Phone, Smoking and Vaping Policy. Staff must not ask children to bring a device on site to demonstrate content and must not use a personal account or device to investigate.

14. Recording, data protection and monitoring

All reported bullying and related harmful incidents are recorded, including reports not substantiated as bullying. Safeguarding records are maintained in the child protection system; behaviour records must signpost to safeguarding records without duplicating sensitive detail unnecessarily.

The policy owner and DSL will review data at least termly for:

74. type, seriousness, location, timing and online/off-site context;
75. repeat reports, children or groups, escalation and retaliation;
76. SEND, disability and prejudice-based or discriminatory factors;
77. attendance, wellbeing, exclusion, restraint or placement impact;

- 78. the timeliness and effectiveness of actions, referrals, support and safety plans; and
- 79. pupil and parent confidence in reporting and response.

Information is accurate, relevant, access-controlled and retained according to the safeguarding and records-retention schedules. Reports to leaders or governance use anonymised or aggregated information where possible; small numbers are handled carefully to avoid identification. Serious or emerging risks are escalated immediately rather than waiting for a termly review.

15. Roles and responsibilities

15.1 Proprietor/governance and senior leadership

- 80. approve the policy, provide resources and assure that behaviour and safeguarding arrangements prevent and respond to bullying;
- 81. review patterns, equality impact, pupil voice, complaints and effectiveness of action;
- 82. ensure staff and volunteers know the reporting routes, including concerns about adults and whistleblowing; and
- 83. make sure commissioning and partnership arrangements clearly allocate responsibilities and information-sharing routes.

15.2 Designated Safeguarding Lead

- 84. lead safeguarding triage, risk assessment, referrals, record quality and safety planning;
- 85. advise on child-on-child abuse, sexual harassment/violence, online image incidents, Prevent and concerns involving adults;
- 86. liaise with families, commissioning schools and statutory partners; and
- 87. ensure the KCSIE 2026 implementation check is recorded from 1 September 2026.

15.3 Policy owner and SEND lead

- 88. coordinate prevention, training, incident analysis and annual review;
- 89. ensure communication support and reasonable adjustments are available; and
- 90. check that responses do not misinterpret disability-related behaviour or leave another child unsafe.

15.4 All staff and volunteers

- 91. model respectful conduct, challenge harmful language and avoid normalising abuse as banter;
- 92. act, report and record; never investigate beyond their role or promise secrecy;
- 93. follow risk assessments, safety plans, online-safety and confidentiality requirements; and
- 94. complete required training and raise concerns if practice is unsafe or ineffective.

16. Bullying or harassment involving staff, parents or visitors

Bullying, harassment, intimidation or threats towards staff are unacceptable whether carried out by a colleague, pupil, parent/carer, governor, contractor or member of the public, online or offline. Immediate safety, evidence preservation, reporting and support requirements in this policy apply. The employer or responsible leader will then use the appropriate staff, complaints, conduct, site-access, health and safety or police procedure, taking account of the DfE's July 2026 non-statutory guidance.

A staff member must not be disadvantaged for raising a safeguarding concern in good faith. Safeguarding allegations, low-level concerns and whistleblowing must remain separate from ordinary workplace mediation or grievance processes and be referred through the correct route.

17. Complaints and escalation

A parent/carer or young person who believes a concern has not been handled properly may use the WSCF complaints procedure. A complaint about process does not pause immediate safeguarding action, a risk assessment or support. Complaints about safeguarding decisions may require advice from the DSL, local authority or commissioning body. Staff concerns about unsafe practice should be raised through senior leadership or the whistleblowing procedure.

18. Training, communication and review

The policy will be explained to children in an accessible form and made available to staff, volunteers and families. Staff receive induction and regular updates proportionate to their role. Learning from incidents, complaints, pupil voice, local safeguarding information and national guidance is incorporated into practice.

This policy is reviewed at least annually and sooner after a serious incident, a material change in law or guidance, a safeguarding review, an identified pattern or evidence that the procedure is not accessible or effective. The next scheduled review is August 2027.

Appendix A - Staff quick response

95. **STOP and make safe.** Intervene safely, separate if needed, obtain first aid, and call 999 for immediate danger.
96. **LISTEN and reassure.** Use the child's communication method; do not blame, lead, repeatedly question or promise secrecy.
97. **REPORT.** Tell the session lead and DSL immediately where safeguarding may be involved.
98. **RECORD.** Write the child's words, facts, time, place, witnesses, impact, action and people informed before the end of the working day.
99. **PRESERVE safely.** Do not use personal devices, ask for forwarding, or view/copy nude or semi-nude images.
100. **FOLLOW the plan.** Apply supervision, safety and communication measures; report any breach, retaliation or escalation immediately.

Appendix B - Minimum incident record

101. name, age and setting/commissioning school of every child involved;
102. date, time, location, activity, transport/off-site/online context and staff present;
103. the report in the child's own words and the communication support used;
104. observed behaviour, injury, distress, property damage and witnesses;
105. whether repeated, discriminatory, sexual, coercive, exploitative, retaliatory or potentially criminal;
106. SEND, health, trauma, care or other vulnerability relevant to risk and adjustments;
107. immediate action, first aid, separation, evidence handling and who was informed;
108. DSL/senior assessment, referrals or agency advice, parents/carers informed and any reason for delay;
109. risk assessment, safety plan, support, consequence and responsible person; and
110. review date, child's views, outcome, recurrence and closure rationale.

References and current guidance

111. [Keeping Children Safe in Education 2026 - statutory guidance from 1 September 2026](#)
112. [Working Together to Safeguard Children 2026](#)
113. [DfE: Preventing and Tackling Bullying](#)
114. [DfE: Preventing and Tackling the Bullying and Harassment of School Staff, July 2026](#)
115. [DfE: Behaviour in Schools](#)
116. [DfE: Equality Act 2010 - advice for schools](#)
117. [DfE: SEND Code of Practice: 0 to 25 years](#)
118. [Home Office: Prevent duty guidance](#)
119. [DfE: Filtering and monitoring core standard, updated June 2026](#)
120. [DfE: School suspensions and permanent exclusions, effective July 2026](#)
121. [Ofsted: School inspection toolkit for use from September 2026](#)

Source position checked 5 August 2026.