



Anti-Bullying Policy

2025/2026

Policy issue and updates

Pages	Issue number	Date
New policy	1	December 2025

The following policy has been approved by the CEO, COO, and Governing Board of Directors.

The policy will be reviewed on an annual basis unless circumstances arise requiring the policy to be reviewed earlier.

Approved by CEO: December 2025

Board signatory: 

Planned Review: August 2026

1. Purpose and scope

- 1.1 Progress Community is committed to providing a safe, respectful, and inclusive online learning environment where all students can thrive without fear of bullying, harassment, or intimidation. This policy sets out our approach to preventing and responding to all forms of bullying, including cyber-bullying, prejudice-based bullying, and discriminatory bullying.
- 1.2 This policy applies to:
- All students enrolled at Progress Community
 - All staff members, including teaching staff, support staff, and senior leadership
 - All interactions within our digital learning environment, including:
 - Live virtual classroom sessions on Vedamo
 - Learning management system activities on Cypher Learning
 - Self-paced learning activities on Century Tech
 - School-related communication channels and platforms
 - Virtual assemblies, breakout rooms, and group activities
 - Behaviour outside our virtual learning environment that impacts the school community or brings the school into disrepute

2. Statutory framework

- 2.1 This policy has been developed with regard to the following statutory guidance and legislation:
- Keeping Children Safe in Education (September 2025)[1]
 - Working Together to Safeguard Children (2023)[2]
 - Behaviour in Schools: Advice for Headteachers and School Staff (February 2024)[3]
 - Online Education Accreditation Scheme Guidance (January 2023)[4]
 - Education Act 2006 (Section 89)
 - Equality Act 2010
 - Children Act 1989 and 2004
 - Education and Inspections Act 2006
 - Malicious Communications Act 1988
 - Protection from Harassment Act 1997
 - Communications Act 2003 (Section 127)

- Public Order Act 1986
- Computer Misuse Act 1990
- Online Safety Act 2023

2.2 Related policies

This policy should be read in conjunction with:

- Safeguarding and Child Protection Policy
- Participation Policy (Behaviour)
- Online safety Policy
- SEND Policy
- Equality and Diversity Policy
- Complaints Policy
- Staff expectations

3. Definition of bullying

3.1 What is bullying?

Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms and is often motivated by prejudice against particular groups.

In an online learning environment, bullying may include:

- Repeated hurtful messages, comments, or communications via chat functions, emails, or messaging platforms
- Exclusion from virtual group activities, breakout rooms, or collaborative projects
- Spreading rumours or sharing private information without consent
- Mocking, mimicking, or making offensive comments during live sessions
- Creating or sharing derogatory content about another person
- Impersonating or misrepresenting another student or staff member
- Deliberately disrupting another student's participation in virtual sessions

3.2 Types of bullying

3.2.1 Cyber bullying

Cyber-bullying is bullying that takes place online or through digital technologies. In our online school context, this includes:

- Sending threatening, abusive, or hurtful messages via chat functions, email, or social media
- Posting or sharing embarrassing, humiliating, or defamatory content
- Creating fake profiles or accounts to impersonate or harass others
- Excluding individuals from online groups or activities
- Sharing private conversations, images, or videos without consent
- Using the anonymity of online platforms to intimidate others
- Coordinated campaigns of harassment across multiple platforms
- Using platforms such as Vedamo chat, Cypher Learning forums, or other school-related digital spaces to bully

3.2.2 Prejudice-based and discriminatory bullying

Progress Community recognises that bullying often targets individuals based on protected characteristics as defined in the Equality Act 2010[4]:

- **Race, religion, or belief:** Bullying based on ethnicity, nationality, skin colour, religious beliefs, or cultural background
- **Sex:** Bullying based on gender, including sexist comments or behaviour
- **Sexual orientation:** Homophobic, biphobic, or related bullying targeting actual or perceived sexual orientation
- **Gender identity:** Transphobic bullying targeting gender identity or gender reassignment
- **Disability or special educational needs:** Bullying related to physical disabilities, learning difficulties, mental health conditions, or neurodiversity
- **Age:** Bullying based on a student's age or maturity level
- **Pregnancy and maternity:** Bullying related to pregnancy or parenting status
- **Appearance or health conditions:** Bullying related to physical appearance, weight, or health conditions

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- **Family circumstances:** Bullying related to being a looked-after child, young carer, family structure, or socio-economic background

3.2.3 Child-on-child abuse

Progress Education recognises that bullying can constitute child-on-child abuse when it is severe or persistent. This may include[1]:

- Sexual harassment and sexual violence
- Initiation or hazing activities
- Abuse in intimate personal relationships between peers
- Causing someone to engage in sexual activity without consent
- Consensual and non-consensual sharing of indecent images (youth produced sexual imagery)
- Upskirting
- Serious physical assault or threatening behaviour

All incidents of child-on-child abuse will be reported to the Designated Safeguarding Lead (DSL) and managed in accordance with our Safeguarding and Child Protection Policy.

3.3 What is not bullying

It is important to distinguish bullying from:

- Single incidents of unkind behaviour (though these are still unacceptable and will be addressed)
- Friendship disagreements or falling out (though support will be provided)
- Appropriate challenge or debate in educational discussions
- Legitimate consequences or sanctions for behaviour

However, any single serious incident will be treated with the utmost concern and may warrant the same response as bullying.

4. Prevention strategies

4.1 Creating a positive online culture

Progress Education fosters a positive, inclusive online learning community through:

- Establishing clear expectations for respectful behaviour in all virtual learning spaces
- Promoting our core values of respect, integrity, responsibility, and excellence
- Regular virtual assemblies and PSHE sessions addressing bullying, online safety, and respectful relationships
- Celebrating diversity and teaching about protected characteristics through the curriculum
- Creating opportunities for positive peer interaction through collaborative online projects and virtual social activities
- Modelling respectful communication by all staff members
- Encouraging students to be upstanders rather than bystanders

4.2 Curriculum and education

Our curriculum actively addresses bullying prevention through:

- **PSHE Education:** Age-appropriate lessons on bullying, cyber-bullying, healthy relationships, respect, and diversity, with particular regard to protected characteristics
- **Relationships and Sex Education (RSE):** Statutory RSE covering respectful relationships, consent, and challenging discriminatory behaviour
- **Online Safety Education:** Teaching students how to stay safe online, recognise bullying behaviour, and seek help through Computing and cross-curricular activities
- **British Values:** Embedding democracy, rule of law, individual liberty, and mutual respect throughout the curriculum
- **Assemblies and Tutor Time:** Regular discussions about anti-bullying themes, including participation in Anti-Bullying Week
- **Restorative Approaches:** Teaching conflict resolution, empathy, and communication skills

At the start of each academic year, all students receive comprehensive briefing on:

- The school's expectations for behaviour and respect
- What constitutes bullying, including cyber-bullying
- How to recognise bullying behaviour
- How and where to report concerns
- The support available to them

4.3 Staff training and awareness

All staff receive training on:

- Recognising signs of bullying in an online environment
- Understanding the particular vulnerabilities of online students
- Responding effectively to disclosures and incidents
- The link between bullying and safeguarding concerns
- Supporting students with SEND who may be more vulnerable to bullying
- Implementing restorative approaches and conflict resolution
- Understanding prejudice-based bullying and protected characteristics
- Using Cloud+ and CPOMS systems for safeguarding monitoring and reporting
- Prevent Duty and recognising extremist behaviour or radicalisation

Training is provided at induction and updated regularly (at least annually).

4.4 Monitoring and supervision

Progress Community maintains oversight of student interactions through:

- Active monitoring and supervision of live virtual classroom sessions on Vedamo
- Regular review of participation and engagement patterns on Cypher Learning and Century Tech
- Use of Cloud+ safeguarding monitoring system during teaching sessions
- Staff presence in breakout rooms and group activities
- Reviewing chat logs and forum discussions where concerns are raised
- Regular welfare check-ins with students by tutors and pastoral staff
- Tracking patterns of attendance and engagement that may indicate concerns

All monitoring is conducted in accordance with GDPR, our Privacy Policy, and with appropriate regard for student privacy.

4.5 Technology and safety measures

Our digital platforms are configured to promote safety:

- Age-appropriate filtering and monitoring systems
- Clear acceptable use policies for all platforms
- Secure authentication and access controls
- Reporting mechanisms integrated into learning platforms
- Regular cybersecurity assessments and updates
- Staff training on recognising concerning online behaviour
- Recording of live sessions where appropriate and with appropriate notice

4.6 Parental partnership

We work in partnership with parents and carers to prevent bullying:

- Providing information about our anti-bullying approach at enrolment
- Sharing guidance on supporting children with online safety at home
- Encouraging open communication between home and school
- Involving parents when concerns arise (for both alleged victims and perpetrators)
- Providing resources and signposting to external support services
- Seeking parental feedback on the effectiveness of our approach

4.7 Peer support systems

Progress Community encourages peer support through:

- Buddy systems for new students
- Peer mentoring schemes where appropriate
- Student voice mechanisms for students to contribute to anti-bullying initiatives
- Encouraging students to look out for one another and report concerns
- Celebrating positive peer relationships and kindness

5. Roles and responsibilities

5.1 The Headteacher

The Headteacher is responsible for:

- Overall implementation and monitoring of this policy
- Ensuring the policy is effectively communicated to all stakeholders
- Reporting to governors on bullying incidents and policy effectiveness
- Ensuring staff receive appropriate training
- Taking ultimate responsibility for serious incidents
- Ensuring a culture of zero-tolerance toward bullying

5.2 The Designated Safeguarding Lead (DSL)

The DSL is responsible for:

- Acting as the lead professional for anti-bullying strategy
- Ensuring all bullying incidents with safeguarding implications are appropriately managed
- Liaising with external agencies where necessary (police, social care, LADO)
- Monitoring patterns and trends in bullying incidents
- Coordinating support for victims and perpetrators
- Maintaining oversight of recording systems (CPOMS)
- Providing advice and support to staff

5.3 All teaching and support staff

All staff are responsible for:

- Promoting a positive, respectful online learning environment
- Being vigilant to signs of bullying during virtual sessions and in student work
- Responding promptly and effectively to any concerns or disclosures
- Recording incidents accurately on CPOMS
- Implementing consistent behaviour expectations
- Modelling respectful communication
- Delivering age-appropriate education on bullying and online safety
- Maintaining professional boundaries and following the Staff Code of Conduct

5.4 Students

All students are expected to:

- Treat others with respect and kindness in all online interactions
- Refuse to engage in bullying behaviour
- Report any bullying they experience or witness
- Support peers who are being bullied
- Follow the school's Acceptable Use Policy and Behaviour Policy
- Participate positively in anti-bullying education
- Be upstanders, not bystanders

5.5 Parents and carers

Parents and carers are encouraged to:

- Discuss bullying and online safety with their children
- Watch for signs that their child may be experiencing bullying
- Report concerns to the school promptly
- Work collaboratively with the school to resolve issues
- Support the school's anti-bullying approach
- Model respectful behaviour and communication
- Supervise their child's online activity appropriately

5.6 The Proprietor and Governing Board

The Proprietor and governing body is responsible for:

- Approving this policy and ensuring it is reviewed regularly
- Monitoring the implementation and effectiveness of the policy
- Ensuring the school meets its legal obligations
- Supporting the Headteacher in maintaining high standards of behaviour

6. Reporting bullying

6.1 How to report

Progress Community is a "telling school" – we actively encourage everyone to report bullying. Students, parents, and staff can report concerns through:

- Speaking directly to any member of staff (class teacher, tutor, pastoral lead, DSL, Headteacher)

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- Emailing the school's safeguarding email address:
safeguarding@progress-community.co.uk
 - Using the reporting function on Cypher Learning or Vedamo platforms
 - Contacting the DSL directly
 - Completing the online concern form on the school website
 - Telephoning the school office

For younger students or those who find verbal reporting difficult, alternative methods are available including email, written notes, or communication through parents/carers.

6.2 Confidentiality

All reports will be taken seriously and handled sensitively. However, students and parents should understand that:

- Complete confidentiality cannot be guaranteed where safeguarding concerns exist
- Information will be shared on a need-to-know basis with relevant staff
- Parents of both the alleged victim and perpetrator will normally be informed
- External agencies may be involved where necessary (police, social care)

6.3 External reporting routes

Students are also informed about external support services:

- **Childline:** 0800 1111 or www.childline.org.uk
- **CEOP (Child Exploitation and Online Protection Command):** www.ceop.police.uk/safety-centre
- **Report Harmful Content:** reportharmfulcontent.com
- **Internet Watch Foundation:** www.iwf.org.uk
- **The Mix:** Online support for under-25s at www.themix.org.uk
- **Young Minds:** Mental health support at www.youngminds.org.uk

7. Responding to bullying incidents

7.1 Immediate response

When bullying is reported or identified, staff will:

1. **Respond promptly** – Take all reports seriously and act without delay
2. **Ensure immediate safety** – Take steps to prevent further harm (e.g., temporarily removing access to certain platform features, adjusting group compositions)
3. **Provide reassurance** – Support the victim and reassure them that the matter will be addressed
4. **Preserve evidence** – Save screenshots, chat logs, emails, or other digital evidence
5. **Record the incident** – Document details on Arbor and CPOMS (where safeguarding is a consideration) including date, time, nature of incident, individuals involved, and actions taken
6. **Inform appropriate staff** – Notify the DSL, and senior staff as appropriate

7.2 Investigation

A thorough investigation will be conducted by the DSL or designated senior staff member, including:

- Speaking separately with the alleged victim, alleged perpetrator(s), and witnesses
- Reviewing digital evidence from platform logs, recordings, or communications
- Considering any relevant context (SEND, safeguarding concerns, patterns of behaviour)
- Assessing whether the incident meets the definition of bullying
- Determining the severity and impact of the behaviour
- Consulting with the safeguarding team where appropriate

All interviews will be conducted sensitively, with appropriate safeguarding measures in place.

7.3 Outcomes and sanctions

Following investigation, appropriate action will be taken in line with our Behaviour Policy. This may include:

For the Alleged Perpetrator:

- Restorative conversation to understand the impact of their actions
- Formal warning and behaviour expectations clearly restated
- Apology (genuine and meaningful, not coerced)
- Loss of privileges (e.g., temporary removal from breakout rooms, restriction of platform features)
- Temporary suspension from certain online activities
- Internal suspension (temporary removal from live sessions with work provided)
- Fixed-term suspension
- Permanent exclusion (in very serious or persistent cases)
- Referral to external agencies where criminal behaviour is suspected

Sanctions will be:

- Proportionate to the severity of the incident
- Consistent with our Behaviour Policy
- Applied fairly, considering any SEND or other relevant factors
- Designed to help the perpetrator understand and change their behaviour

For the Victim:

- Reassurance and emotional support
- Regular check-ins and monitoring of wellbeing
- Adjustments to learning arrangements if needed (e.g., separate breakout groups)
- Access to pastoral support or counselling
- Support to rebuild confidence and resilience
- Signposting to external support services

For Witnesses:

- Acknowledgement of their courage in reporting
- Reassurance about their safety
- Support if they have been affected by witnessing the incident

7.4 Parental involvement

Parents of both the victim and perpetrator will be informed promptly and kept updated throughout the process. This communication will include:

- Details of the incident (as appropriate and with sensitivity)
- Actions taken by the school
- Support being provided
- How parents can support at home
- Any follow-up actions or monitoring planned

Meetings may be held virtually via secure video conferencing or by telephone.

7.5 Special considerations

7.5.1 Students with SEND

When responding to bullying involving students with SEND, the school will:

- Consider whether SEND has contributed to the behaviour
- Make reasonable adjustments as required under the Equality Act 2010
- Involve the SENCO in planning appropriate responses
- Consider whether additional support or intervention is needed
- Balance the needs of all students involved

Having SEND does not excuse bullying behaviour, but it may inform how we respond.

7.5.2 Serious or Criminal Behaviour

Where bullying involves serious harm or criminal behaviour, the school will:

- Inform the police (e.g., assault, threats, hate crimes, sexual offences, malicious communications)
- Contact children's social care if there are child protection concerns
- Notify the Local Authority Designated Officer (LADO) if staff are involved
- Follow statutory guidance for handling specific safeguarding issues
- Preserve evidence for potential criminal investigation

Examples of behaviour that may constitute criminal offences include:

- Threats of violence or actual violence
- Theft or extortion
- Sexual harassment, sexual violence, or sharing of indecent images
- Hate crimes related to protected characteristics
- Malicious communications or harassment under the Malicious Communications Act 1988 or Communications Act 2003
- Hacking or unauthorised access under the Computer Misuse Act 1990

7.6 Monitoring and follow up

Following any bullying incident:

- Regular follow-up meetings will be held with the victim to monitor wellbeing
- The perpetrator will be monitored to ensure behaviour has improved
- A review meeting will be scheduled (typically within 4-6 weeks)
- Patterns will be monitored through Arbor/CPOMS data to identify repeat incidents
- Further action will be taken if bullying continues
- Both sets of parents will be kept informed of progress

8. Support for those involved

8.1 Support for victims

Progress Community is committed to supporting students who have experienced bullying:

- Regular check-ins with tutor or pastoral support
- Access to school counselling services
- Peer support and buddy systems where appropriate
- Adjustments to online learning environment (e.g., changes to group compositions)
- Liaison with parents to provide consistent support
- Signposting to external support organisations (Childline, Young Minds, Anti-Bullying Alliance)
- Strategies to build resilience and confidence

- Continued monitoring of wellbeing and academic progress

8.2 Support for perpetrators

The school recognises that those who bully often need support to understand and change their behaviour:

- Exploration of the reasons behind their behaviour
- Education about the impact of bullying on others
- Development of empathy and social skills
- Support for any underlying issues (e.g., mental health, trauma, family difficulties)
- Clear behaviour expectations and boundaries
- Positive reinforcement when behaviour improves
- Involvement of parents in supporting behaviour change
- Referral to external services if needed (e.g., CAMHS, youth services)

8.3 Support for parents/carers

Parents may find it distressing to learn their child has been involved in bullying, either as a victim or perpetrator. The school will:

- Provide clear information about what has happened and what actions are being taken
- Offer guidance on supporting their child at home
- Maintain regular communication throughout the process
- Signpost to external support services and resources
- Work in partnership to achieve the best outcomes for all students

8.4 Staff support

Staff members who are affected by bullying incidents or who are supporting students involved will have access to:

- Support from senior leaders and the DSL
- Supervision and debriefing opportunities
- Training and professional development
- Employee assistance programme resources

9. Cyber-bullying beyond school platforms

9.1 Jurisdiction

While our primary responsibility is for behaviour within our online learning environment, we recognise that cyber-bullying can occur on platforms and social media outside our direct control, but which affects our school community.

Under the Education and Inspections Act 2006, the Headteacher has the power to regulate student conduct to such an extent as is reasonable, even when they are not on school premises or under school supervision, if:

- The behaviour could affect the orderly running of the school
- The behaviour poses a threat to another student or staff member
- The behaviour could adversely affect the reputation of the school

9.2 Responding to external cyber-bullying

When cyber-bullying outside school platforms is reported, the school will:

- Take the report seriously and investigate
- Contact parents of all students involved
- Request that offending content be removed
- Apply sanctions in line with the Behaviour Policy where appropriate
- Contact the platform provider to report abusive content
- Contact police if the behaviour is criminal
- Provide support to the victim regardless of where the bullying occurred

9.3 Parental responsibility

Parents are reminded that they are responsible for supervising their child's online activity outside school sessions. We encourage parents to:

- Understand which platforms their child uses
- Know who their child communicates with online
- Be aware of privacy settings and reporting mechanisms
- Monitor online activity appropriate to their child's age
- Have open conversations about online safety and behaviour
- Report concerns to the school or directly to platforms/police as appropriate

9.4 Guidance for students

Students are taught to protect themselves from cyber-bullying by:

- Keeping passwords private and secure
- Using privacy settings on social media
- Being cautious about what they share online
- Not responding to or forwarding hurtful messages
- Blocking users who send inappropriate content
- Saving evidence (screenshots) before reporting
- Reporting concerns to a trusted adult
- Understanding that "deleting" does not always remove content permanently

10. Recording and monitoring

10.1 Recording incidents

All bullying incidents must be recorded on Arbor and CPOMS including:

- Date, time, and location (platform/virtual space)
- Names of all individuals involved (victim, perpetrator, witnesses)
- Description of the incident (what happened, what was said/done)
- Evidence (screenshots, chat logs, witness statements)
- Whether the bullying was related to protected characteristics
- Actions taken and sanctions applied
- Support provided to all parties
- Parental communication
- Follow-up actions planned

10.2 Data protection

All records are kept in accordance with GDPR and our Data Protection Policy. Access to records is restricted to relevant staff on a need-to-know basis.

10.3 Analysis and reporting

The DSL will regularly analyse bullying data to identify:

- Patterns and trends (frequency, types, individuals involved)
- Whether particular groups are disproportionately affected
- Effectiveness of interventions
- Areas for improvement in policy or practice

A summary report will be provided to the Headteacher and governors termly, including:

- Number and nature of incidents
- Actions taken and outcomes
- Emerging patterns or concerns
- Recommendations for policy or practice development

11. Staff allegations

11.1 Allegations against staff

Any allegations of bullying, harassment, or inappropriate behaviour by staff will be taken extremely seriously and investigated in accordance with:

- Keeping Children Safe in Education (Part Four)
- The school's Staff Code of Conduct
- The school's Safeguarding and Child Protection Policy (Managing Allegations Against Staff)

Reports should be made immediately to the Headteacher or, if the allegation concerns the Headteacher, to the Chair of Governors.

Where an allegation meets the threshold for harm, the Local Authority Designated Officer (LADO) will be contacted within one working day.

11.2 Staff to staff bullying

Any concerns about bullying or harassment between staff members should be reported to the Headteacher or appropriate senior leader and will be addressed in accordance with:

- HR policies and procedures
- Employment law requirements

12. Monitoring and review

12.1 Policy review

This policy will be reviewed annually by the Senior Leadership Team and DSL, in consultation with staff, students, parents, and governors. The review will consider:

- Changes to legislation or statutory guidance
- Effectiveness of the policy in preventing and addressing bullying
- Feedback from the school community
- Incident data and trends
- Best practice developments

12.2 Evaluation measures

The effectiveness of this policy will be evaluated through:

- Analysis of CPOMS incident data
- Student voice surveys and feedback
- Parent questionnaires
- Staff feedback and observations
- Learning walks and session observations
- Ofsted or DfE inspection feedback
- Comparison with previous years' data

12.3 Continuous improvement

Progress Community is committed to continuous improvement in preventing and responding to bullying. We will:

- Stay informed about emerging online risks and trends
- Update our approach based on research and best practice
- Seek student and parent input on anti-bullying initiatives
- Provide regular training and professional development for staff
- Celebrate successes and learn from challenges

13. Key contacts

Role	Name	Contact details
DSL	Naomi Jones Head of Community	Naomi.jones@progress-schools.co.uk 07955289253
Deputy DSL		
Safeguarding		safeguarding@progress-community.co.uk

External agencies

Organisation	Contact
Childline	0800 1111 www.childline.org.uk
CEOP	www.ceop.police.uk/safety-centre
NSPCC Helpline	0808 800 5000
Anti-Bullying Alliance	www.anti-bullyingalliance.org.uk
Report Harmful Content	www.reportharmfulcontent.com
Internet Watch Foundation	www.iwf.org.uk
Young Minds	www.youngminds.org.uk
The Mix (under 25s)	www.themix.org.uk
Victim Support	0808 168 9111 www.victimsupport.org.uk