APEX2100

ANTI-BULLYING AND CYBERBULLYING POLICY

Academic Year: 2026–2027
Policy Owner: Apex2100 Education Board
Designated Safeguarding Lead (DSL): Dave Breen
Deputy Designated Safeguarding Leads (DDSLs): Karen Thomas, Stuart Terris and Mark Tilston
Designated Safeguarding Governor / Board Lead: Mike Buchanan
Review frequency: At least annually and sooner where legislation, statutory guidance or School practice changes
Presented to Board: September 2026
Next scheduled review: September 2027

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1. Policy Statement
Apex 2100 is committed to providing an environment in which every student feels safe, respected, valued and able to participate fully in Academy life.

Bullying is unacceptable and will not be tolerated.
The Academy recognises that bullying can have a serious and lasting impact on a student's emotional wellbeing, confidence, education, relationships and sense of safety. Bullying may occur in person, online, through social media, messaging services, gaming platforms or through a combination of online and offline behaviour.

Apex2100 will respond to allegations and concerns about bullying promptly, fairly and proportionately.
The Academy will:

- take all reports of bullying seriously;
- listen to students and ensure that concerns can be raised safely;
- distinguish between bullying, conflict, friendship difficulties and other behaviour while recognising that all may require support;
- investigate concerns appropriately;
- provide support to students who experience bullying;
- address behaviour by students who bully or contribute to bullying;
- consider the needs of witnesses and the wider student community;
- take particular care where bullying has a safeguarding dimension;
- recognise the additional risks faced by vulnerable students;
- address cyberbullying and technology-enabled abuse;
- work with parents and carers where appropriate; and
- maintain appropriate records of significant bullying concerns and actions taken.

Bullying may constitute a safeguarding concern. Where this is the case, the Academy's Safeguarding and Child Protection Policy will take priority.

2. Scope

This policy applies to:

- all Apex 2100 students;
- all staff;
- governors and Board members;
- volunteers;
- contractors;
- visitors; and
- any person involved in the Academy community.

The policy applies to behaviour:

- during Academy activities;
- during training and educational activities;
- during residential or boarding arrangements;
- during travel connected with the Academy;
- during Academy events;
- online;
- through social media or messaging platforms;
- through gaming or other digital platforms; and
- outside Academy activities where the behaviour has a significant impact on the safety or wellbeing of an Apex2100 student or the wider Academy community.

3. What Is Bullying?

Bullying is behaviour that is:

- repeated, or has the potential to be repeated;
- intended to hurt, intimidate, humiliate or undermine another person; and
- involves a real or perceived imbalance of power.

Bullying may be physical, verbal, emotional, social, relational or digital.
However, the Academy will not require a student to demonstrate repeated behaviour before taking action where the behaviour is serious or presents a risk of harm.

A single incident may require a safeguarding or disciplinary response even where it does not meet the definition of bullying.

4. Types of Bullying

Bullying can include, but is not limited to:

- Physical bullying

- hitting;
- pushing;

- kicking;
- grabbing;
- tripping;
- damaging possessions;
- threatening physical violence; or
- intimidating physical behaviour.

Verbal bullying

- insults;
- name-calling;
- mocking;
- threatening language;
- humiliating comments;
- repeated criticism; or
- deliberately offensive remarks.

Emotional or psychological bullying

- intimidation;
- manipulation;
- humiliation;
- deliberately undermining confidence;
- threats;
- coercion;
- exclusion;
- controlling behaviour; or
- deliberately causing distress.

Social or relational bullying

- deliberately excluding someone;
- encouraging others not to associate with someone;
- spreading rumours;
- manipulating friendships;
- publicly humiliating someone;
- encouraging group hostility; or
- deliberately damaging someone's reputation.

Prejudice-based bullying
Bullying may be related to:

- race;
- nationality;
- religion or belief;



- sex;
- sexual orientation;
- gender reassignment;
- disability;
- special educational needs;
- appearance;
- age;
- family circumstances;
- socio-economic background;
- language;
- culture; or
- any other characteristic or perceived characteristic.

The Academy will treat prejudice-based bullying particularly seriously.

Sexual bullying

This may include:

- sexualised comments;
- sexual jokes;
- unwanted sexual attention;
- sexual harassment;
- sexualised name-calling;
- spreading sexual rumours;
- sharing sexualised information;
- pressuring someone into sexual behaviour; or
- sexualised online behaviour.

Sexual bullying may constitute a safeguarding concern and will be dealt with under the Safeguarding and Child Protection Policy where appropriate.

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5. Cyberbullying

Cyberbullying is bullying carried out using technology or digital communication.

It may involve:

- social media;
- messaging applications;
- group chats;
- email;
- online gaming;
- livestreaming;
- video-sharing platforms;
- anonymous accounts;
- fake profiles;
- online forums;
- image sharing;
- edited or manipulated images;
- threatening messages;

- abusive comments;
- spreading rumours;
- exclusion from online groups;
- impersonation;
- publication of private information; or
- encouraging others to target an individual.

Cyberbullying can be particularly harmful because it can:

- occur at any time;
- reach a large audience;
- be difficult to remove;
- continue outside Academy hours;
- involve anonymous perpetrators; and
- create a sense that there is no safe environment away from the bullying.

The Academy will respond to cyberbullying where it affects an Apex2100 student, the Academy community or the safety and wellbeing of students.

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6. Bullying and Safeguarding

Bullying may be a safeguarding issue.
Staff must report concerns to the DSL or a DDSL where bullying involves:

- threats of serious harm;
- sexual behaviour;
- sexual harassment;
- sexual violence;
- exploitation;
- coercion;
- hate-based abuse;
- serious intimidation;
- self-harm or threats of self-harm;
- criminal behaviour;
- sharing sexual images;
- grooming;
- abuse of power;
- significant emotional harm;
- threats involving weapons;
- radicalisation or extremist behaviour; or
- any other circumstance in which a child may be suffering or likely to suffer harm.

The Academy will not treat serious safeguarding concerns simply as behaviour problems.

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7. Recognising Bullying

Students may not always report bullying directly.
Staff should remain alert to:

- withdrawal;

- anxiety;
- changes in mood;
- reluctance to attend;
- changes in friendships;
- isolation;
- deterioration in performance;
- loss of confidence;
- changes in eating or sleeping;
- unexplained injuries;
- damaged or missing possessions;
- increased use or avoidance of technology;
- distress following use of a phone or computer;
- sudden changes in online behaviour;
- reluctance to participate in activities;
- unexplained requests to leave accommodation or activities;
- self-harm; or
- other significant changes in behaviour or presentation.

These indicators do not necessarily mean that bullying is occurring. Staff should maintain professional curiosity and consider the wider context.

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8. Reporting Bullying

Students are encouraged to report bullying as soon as they become aware of it.
Students can report concerns to:

- a member of teaching staff;
- a member of the pastoral team;
- a trusted adult;
- the DSL;
- a DDSL;
- a member of the Academy leadership team; or
- another adult they trust.

Students should also report concerns if they witness bullying or believe another student may be experiencing bullying.
Students will be encouraged to understand that reporting bullying is not "snitching" or causing trouble. Reporting unsafe behaviour helps protect individuals and the wider Academy community.

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9. Staff Responsibilities

All staff have a responsibility to:

- take reports seriously;
- listen carefully;
- avoid dismissing concerns as friendship disputes without proper consideration;
- record significant concerns;
- report safeguarding concerns immediately;
- challenge bullying behaviour;

- maintain appropriate confidentiality;
- avoid making promises of absolute confidentiality;
- support affected students;
- follow the Behaviour Policy where appropriate; and
- escalate concerns where the response is inadequate.

Staff must never encourage students to resolve serious bullying themselves.

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10. Responding to a Report
When bullying is reported, the Academy will:

1. Listen to the student.
2. Establish the immediate safeguarding position.
3. Consider whether the matter should be referred to the DSL.
4. Record relevant information.
5. Establish what is known about the incident or pattern of behaviour.
6. Consider the views and wishes of the student.
7. Identify any immediate protective measures required.
8. Speak with other relevant students or adults where appropriate.
9. Determine whether the behaviour meets the definition of bullying.
10. Consider whether other policies or safeguarding procedures apply.
11. Decide on appropriate support and consequences.
12. Monitor the situation after the initial response.

The Academy will avoid unnecessary questioning or repeated retelling of events, particularly where the concern has a safeguarding dimension.

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11. Immediate Protection
Where a student is at immediate risk, the Academy may take steps including:

- separating students;
- increasing supervision;
- changing activity arrangements;
- changing accommodation arrangements where appropriate;
- restricting contact between students;
- providing a safe space;
- involving parents or carers;
- contacting emergency services where necessary; or
- making a safeguarding referral.

Any protective measure will be proportionate and reviewed regularly.

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12. Supporting Students Experiencing Bullying
The Academy will consider the individual needs of each student.
Support may include:

- a trusted adult;
- pastoral support;

- regular check-ins;
- counselling or wellbeing support;
- changes to activities;
- changes to accommodation where appropriate;
- additional supervision;
- support with online safety;
- assistance with reporting online abuse;
- support with rebuilding friendships;
- communication with parents or carers; and
- referral to specialist services where necessary.

The Academy will monitor the student's welfare and consider whether the bullying has had a wider impact on their education or wellbeing.

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13. Responding to Students Who Bully

The Academy will address bullying behaviour fairly and proportionately.
Responses may include:

- restorative conversations;
- behavioural expectations being reinforced;
- reflection and education;
- removal of privileges;
- increased supervision;
- restrictions on contact with another student;
- parental involvement;
- pastoral intervention;
- behaviour support;
- formal disciplinary action; and
- safeguarding intervention where appropriate.

There is **no detention system at Apex2100**.
Consequences will therefore focus on proportionate, meaningful and educational responses rather than automatic detention.
The Academy will consider the age, maturity, circumstances and needs of the student involved.
Where bullying is deliberate, repeated or particularly serious, stronger disciplinary action may be appropriate.

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14. Restorative Approaches

Where appropriate and where it is safe to do so, Apex2100 may use restorative approaches.
A restorative approach may help students:

- understand the impact of their behaviour;
- accept responsibility;
- repair relationships;
- rebuild trust;
- develop empathy; and
- identify better ways of dealing with conflict.

Restorative approaches will **not** be used where doing so would place a victim at risk or would be inappropriate because of the nature of the allegation.
A student who has experienced bullying will never be required to participate in a restorative process.

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15. Bullying and the Wider Student Community
The Academy recognises that bullying can affect:

- witnesses;
- friends;
- roommates;
- teammates;
- groups;
- classes; and
- the wider Academy community.

Where appropriate, the Academy may provide wider support or education to students without disclosing confidential information.
The Academy will seek to create a culture in which students challenge bullying safely and support one another.

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16. Online Evidence
Where cyberbullying is reported, students should be encouraged to preserve relevant evidence where it is safe to do so.
Evidence may include:

- screenshots;
- usernames;
- dates and times;
- URLs;
- messages;
- posts;
- photographs;
- videos; or
- details of accounts involved.

Students should not be encouraged to forward illegal sexual images of children.
Where sexual images of children are involved, the matter must immediately be referred to the DSL or DDSL.
Staff must follow the Academy's Online Safety and Safeguarding procedures.

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17. Anonymous Reports
The Academy will accept anonymous reports where possible.
However, anonymity may limit the Academy's ability to investigate or provide direct support.
Where an anonymous concern is received, the Academy will assess the information available and determine whether further action is required.

Students will be encouraged to provide sufficient information to enable concerns to be properly considered while understanding that they may be worried about identifying themselves.

18. False or Malicious Allegations

The Academy recognises that allegations of bullying can sometimes be made in error or deliberately.
All concerns will initially be taken seriously and assessed fairly.
Where an allegation is found to have been deliberately fabricated or malicious, the Academy may take appropriate action under its Behaviour Policy.
A concern being unsubstantiated does not automatically mean that the student who reported it acted dishonestly.
The Academy will avoid discouraging students from reporting genuine concerns.

19. Bullying Involving Staff or Adults

Where an allegation of bullying, harassment, abuse or inappropriate behaviour involves an adult working with students, the matter must be reported to the DSL or, where appropriate, dealt with under the Academy's procedures for allegations against staff.
The Academy will distinguish between ordinary professional management, legitimate challenge and inappropriate behaviour.
Any concern that an adult may have harmed a child or may pose a risk of harm must be dealt with under the safeguarding procedures.

20. Parent and Carer Involvement

The Academy may involve parents or carers where appropriate.
The Academy will consider:

- the nature of the concern;
- the student's wishes;
- safeguarding considerations;
- the student's age and maturity;
- whether parental involvement is likely to support the student; and
- whether sharing information could increase risk.

Where a safeguarding concern exists, information may need to be shared without parental consent where legally appropriate.

21. Vulnerable Students

The Academy recognises that some students may be particularly vulnerable to bullying.
Additional consideration may be required for students with:

- SEND;
- communication difficulties;
- social difficulties;
- additional learning needs;

- previous experiences of bullying;
- social isolation;
- safeguarding concerns;
- disabilities;
- other vulnerabilities.

Reasonable adjustments will be made where necessary to ensure that all students can report concerns and access support.

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22. Prevention
Apex 2100 will seek to prevent bullying through:

- clear behavioural expectations;
- positive relationships between staff and students;
- student education;
- safeguarding education;
- online safety education;
- discussions about respect and dignity;
- education about healthy relationships;
- encouraging students to report concerns;
- appropriate supervision;
- staff training;
- monitoring of incidents and patterns; and
- regular review of Academy culture.

Students will be taught that bullying is unacceptable and that everyone has a responsibility to contribute to a respectful community.

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23. Student Responsibilities
Students are expected to:

- treat others with respect;
- avoid bullying and intimidation;
- avoid discriminatory or hateful behaviour;
- use technology responsibly;
- not share harmful or humiliating content;
- report concerns about bullying;
- support peers who may be experiencing difficulties;
- cooperate with reasonable investigations; and
- follow the Academy's Code of Conduct.

Students should not retaliate against someone who reports bullying.

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24. Staff Training
Relevant staff will receive appropriate training concerning:

- recognising bullying;
- cyberbullying;

- child-on-child abuse;
- sexual harassment;
- harmful sexual behaviour;
- safeguarding;
- online safety;
- prejudice-based bullying;
- supporting vulnerable students;
- responding to disclosures; and
- appropriate recording and escalation.

Staff will understand the distinction between bullying, ordinary conflict and safeguarding concerns.

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25. Recording and Monitoring

The Academy will maintain appropriate records of significant bullying concerns.
Records may include:

- the date;
- students involved;
- nature of the concern;
- actions taken;
- safeguarding considerations;
- support provided;
- disciplinary action where applicable;
- communication with parents or carers;
- follow-up actions; and
- outcomes.

The Academy will monitor records to identify:

- repeated incidents;
- patterns involving particular students;
- locations where concerns occur;
- online trends;
- group behaviour;
- prejudice-based incidents; and
- wider cultural issues.

Patterns will inform safeguarding, pastoral and behaviour planning.

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26. Confidentiality and Information Sharing

Information concerning bullying will be handled sensitively.
The Academy will share information only where there is an appropriate reason to do so and in accordance with applicable data protection and safeguarding requirements.
Confidentiality cannot be guaranteed where information needs to be shared to protect a child.
Students will be informed of this where appropriate.

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27. Serious Incidents

Where bullying involves serious violence, threats, sexual violence, sexual harassment, hate crime, exploitation, criminal behaviour or significant safeguarding concerns, the Academy may involve:

- parents or carers;
- the police;
- children's social care;
- healthcare professionals;
- safeguarding partners; or
- other appropriate agencies.

The Academy will determine the appropriate response based on the circumstances.

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28. Links With Other Policies

This policy should be read alongside:

- Safeguarding Children and Child Protection Policy;
- Staff Code of Conduct;
- Behaviour and Student Conduct Policy;
- Online Safety and Acceptable Use Policy;
- Equality, Diversity and Inclusion Policy;
- Child-on-Child Abuse Policy;
- Sexual Violence and Sexual Harassment procedures;
- Complaints Policy;
- Whistleblowing Policy; and
- Health and Wellbeing procedures.

Where bullying also constitutes a safeguarding concern, the Safeguarding and Child Protection Policy will apply.

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29. Policy Review

This policy will be reviewed at least annually.
The review will consider:

- bullying incidents;
- cyberbullying;
- safeguarding concerns;
- student feedback;
- parent feedback;
- staff feedback;
- behavioural trends;
- prejudice-based incidents;
- online safety developments;
- changes in legislation or statutory guidance; and
- lessons learned from incidents.

The policy will be reviewed sooner where there is a significant change in circumstances or safeguarding requirements.

APPENDIX 1
WHAT STUDENTS SHOULD DO IF THEY ARE BEING BULLIED
If you are being bullied:

1. Tell someone you trust.
2. Tell a member of staff.
3. Tell the DSL or a DDSL if you feel unsafe.
4. Keep evidence of online bullying where it is safe to do so.
5. Do not retaliate or threaten the person bullying you.
6. Do not suffer in silence.
7. Remember that bullying is not your fault.

If you see another student being bullied, tell a member of staff.

APPENDIX 2
STAFF QUICK GUIDE
If a student reports bullying:
Listen → Take seriously → Make safe → Record → Report → Follow up
Staff should:

- listen calmly;
- take the student seriously;
- avoid promising secrecy;
- establish whether there is an immediate safeguarding concern;
- report safeguarding concerns to the DSL/DDSL immediately;
- record relevant facts;
- avoid investigating beyond their role;
- provide appropriate immediate support; and
- follow up where required.

Remember
Bullying is not "banter".
Bullying is not "just part of growing up".
Cyberbullying is still bullying.
Serious bullying may be a safeguarding concern.
There is no detention system at Apex2100.
The Academy will use proportionate, educational, restorative and disciplinary responses appropriate to the circumstances.