Welsh Government

Consultation – summary of response

Revised draft anti-bullying guidance and toolkit

Respecting others – Inspiring rights, respect and equality

Date of issue: May 2019

**Respecting others
Inspiring rights, respect and equality**

Audience	Local authorities and other public bodies, Third sector, voluntary sector, parents/ carers, children and young people and other interested parties.
Overview	This consultation sought the views on revised draft anti-bullying guidance and selection of supporting resources
Action required	No action – for information only.
Further information	Enquiries about this document should be directed to: Supporting Achievement and Safeguarding Branch Support for Learners Division The Education Directorate Welsh Government Cathays Park Cardiff CF103NQ e-mail: CCD.SAS@gov.wales

 @WG_Education

 Facebook/EducationWales

Additional copies	This document can be accessed from the Welsh Government's website at https://gov.wales/draft-guidance-challenge-bullying-schools
Related documents	Welsh Government Consultation document - Respecting others - Inspiring rights, respect and equality (2018)

Contents

Introduction

Between 14 November 2018 and 15 February 2019, we consulted on proposals for revised Welsh Government anti-bullying guidance. A sample toolkit of resources accompanied the draft guidance.

In our consultation, we proposed to update the anti-bullying guidance so that it was clearer and more user-friendly. The consultation sought feedback on whether the draft guidance provided sufficient clarity on a number of key areas including:

- tackling bullying more holistically, ensuring the guidance reflects wider policy and reforms that have already taken place and which will occur in future;
- more clarity about what bullying is and is not;
- roles and responsibility for addressing bullying inside and outside school settings;
- types of bullying - including protected characteristics;
- what to do if concerned bullying is happening;
- arrangements regarding the reporting, recording and monitoring of bullying;
- prevention strategies for challenging bullying behaviour;
- children's rights; and
- legislation underpinning anti-bullying.

The draft guidance also included signposting to a sample of anti-bullying resources to help schools implement the policy at an operational level.
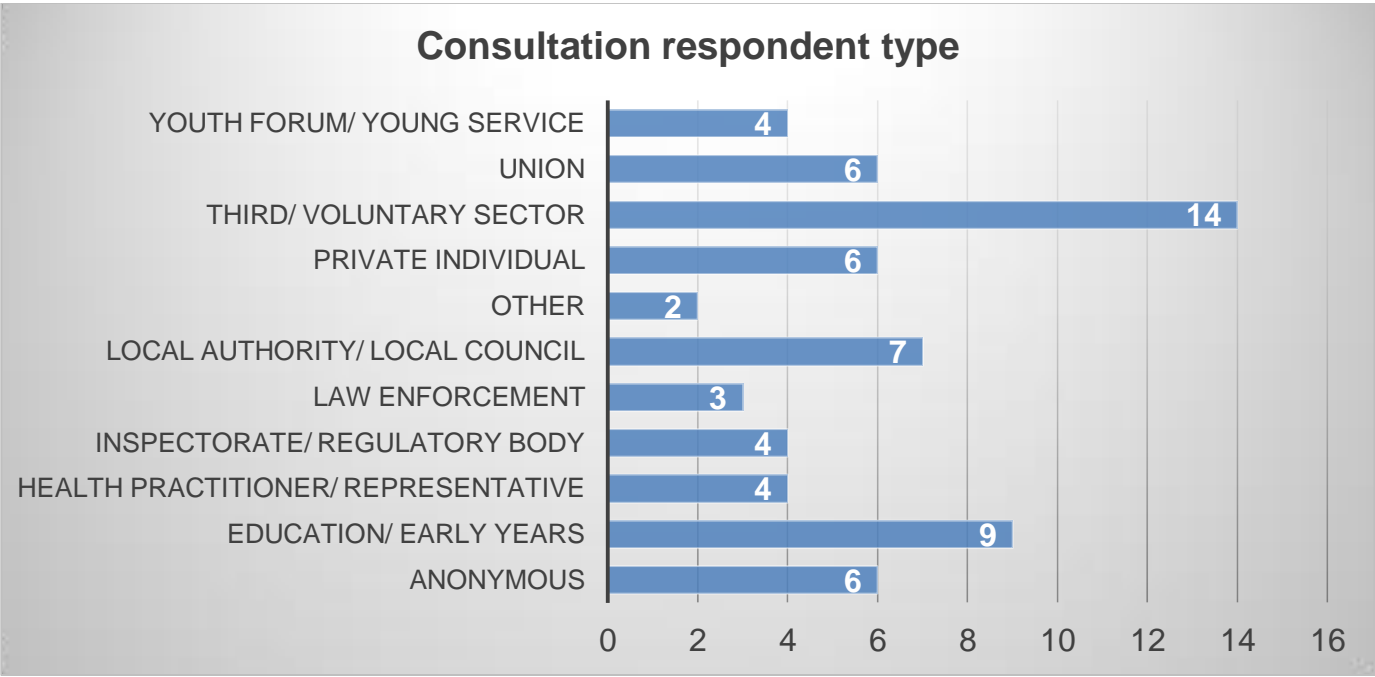
The consultation was not intended to change the requirements currently set out in legislation, simply to clarify requirements already in place.

The purpose of the consultation was to establish whether the draft children and young people guidance and school guidance and selection of supporting resources for schools, meet the needs of the key audiences.

Summary of consultation responses

The following analysis is based on the 65 consultation responses received. 34 responses were received via the Welsh Government's online consultation system. A further 31 responses were received via email. 4 responses were submitted in Welsh.

The consultation respondents have been categorised as follows:

Consultation respondent type

Respondent type	Count
YOUTH FORUM/ YOUNG SERVICE	4
UNION	6
THIRD/ VOLUNTARY SECTOR	14
PRIVATE INDIVIDUAL	6
OTHER	2
LOCAL AUTHORITY/ LOCAL COUNCIL	7
LAW ENFORCEMENT	3
INSPECTORATE/ REGULATORY BODY	4
HEALTH PRACTITIONER/ REPRESENTATIVE	4
EDUCATION/ EARLY YEARS	9
ANONYMOUS	6

The largest number of identified respondents were from the third/ voluntary sector (14), education/ early years sector (9) and local authorities (7).

Government Response

The public consultation was supported by six engagement events. Two of the events were for children and young people from both primary and secondary school settings. The other four events were regional multi-agency events; attendees included education practitioners, Estyn, local government officers and representation from the Police forces and Local Health Boards. All six events were supported by external facilitators; they led discussions at the workshops and have compiled summaries, which have been published alongside this summary of responses.

The responses to this consultation, alongside the feedback received from the engagement events, are being used to inform the development of the final guidance suite and supporting resource toolkit, which will be published in the new academic year.

Anti-bullying guidance

Question 1

Is the anti-bullying guidance explained clearly? If not, which areas could be improved and why? Are there aspects that you particularly like, and if so, why?

Due to rounding, percentages shown in the chart below may not always appear to add up to 100%
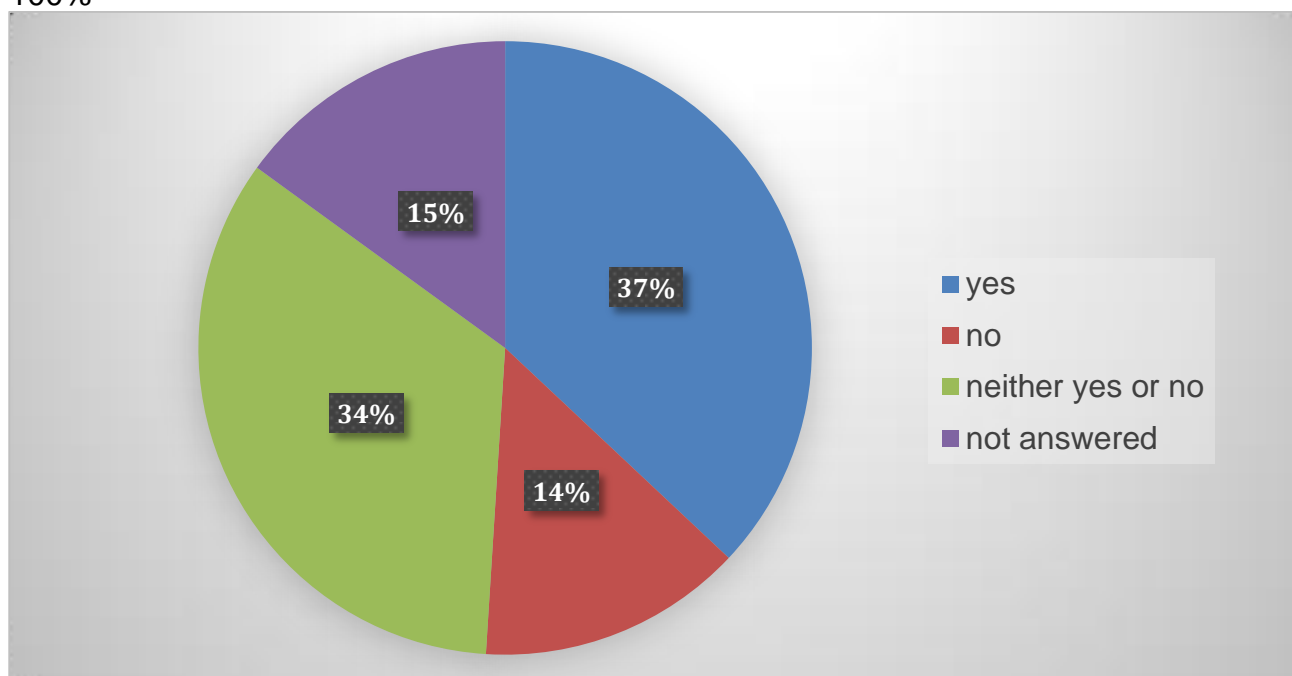
Just under four in ten respondents agreed that the anti-bullying guidance is explained clearly (37%). Just over a third of respondents were undecided whether the guidance is clear. Supporting comments were provided by the majority of respondents to this question, irrespective of whether they agreed, disagreed or were undecided in their views.

Overall, respondents were in support of having separate guidance documents targeted at key audiences.

"Welcome the approach of age specific information, with clear outline of responsibilities of individuals, parents, teachers etc. and for the focus on prevention as well as tackling bullying in schools"

Respondents were divided in their views as to whether the guidance provides sufficient clarity regarding key topics within the document.

"The guidance is set out clearly. Current issues have been identified clearly as well as what needs to be done. The glossary of terms at the beginning is also useful – good to see this outlined before we read the document and not at the end."

"Responding to bullying and interventions are not particularly helpful as they lack information about the pragmatic tools to do this."

4

The majority of respondents liked the clarity the guidance provides in defining bullying.

"Glad to see you exploring the definition of bullying and noting also that there is no legal definition available. The document is modern in its approach in that it recognizes the various forms of bullying in this modern era..."

Whilst the majority of respondents liked that the guidance would be targeted at key audiences, some expressed concern that the children and young people (11-18 years) guidance was not currently age appropriate in design and content to appeal to that audience.

"The guidance aimed at children and young people, and particularly the guidance for 11-18 year olds could be made more accessible in presentation and format"

Suggestions for how the guidance could be further clarified included:

"This is a clear and comprehensive booklet that covers a wide aspect of issues. There possibly needs more examples of good practice/ examples of policies that are deemed effective."

"We are happy to see curricular approaches mentioned in the guidance but think this section may be expanded."

Question 2

Is the anti-bullying guidance user-friendly? If not, which areas could be improved and why? Are there aspects that you particularly like, if so, why?

Due to rounding, percentages shown in the chart below may not always appear to add up to 100%
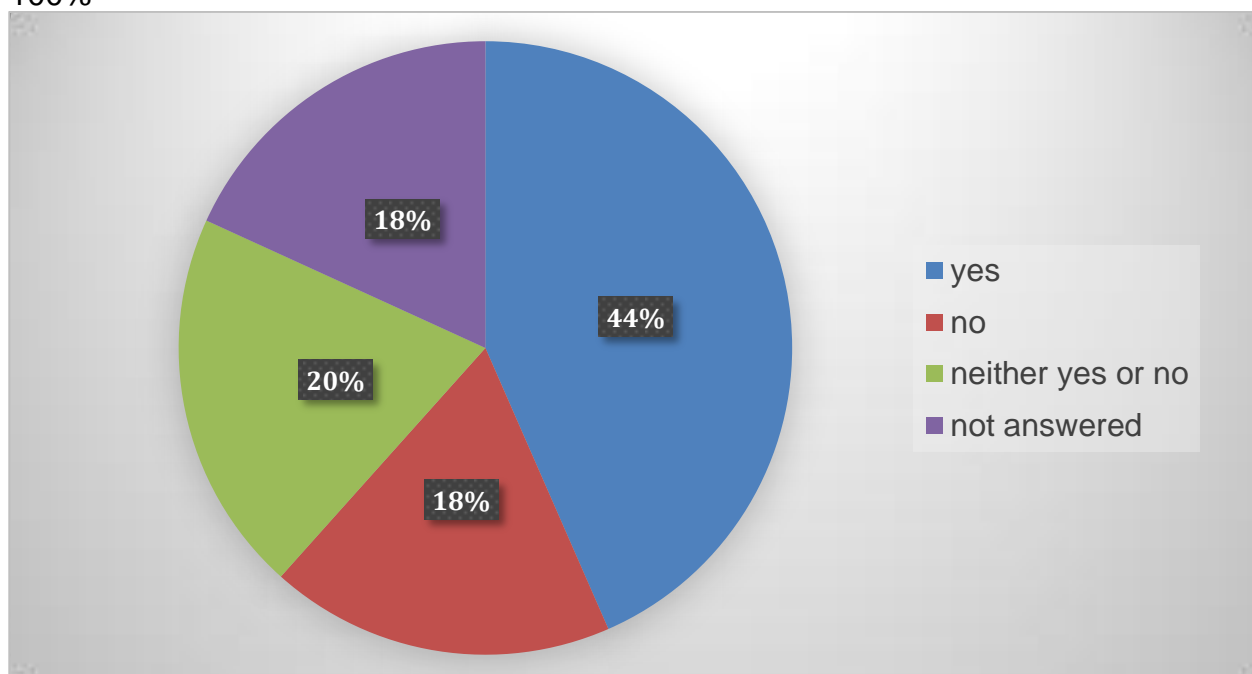
Nearly half of respondents agreed that the draft guidance was user friendly (44%). Respondent feedback included:

"It is a condensed version of the three separate guidance documents that were issued in September 2011, which makes it easier to read and digest"

"Having the toolkit icons, with particular reference to which part of the toolkit each icon refers is an excellent idea"

However, some respondents expressed concern that by streamlining the guidance some potentially important detail might be lost.

"While there are many positive elements of the guidance… in its current form does not provide a sufficient level of support for schools in addressing the problem of homophonic, biphonic and transphobic bullying"

"Interventions also feel rather thin… it has not gone into sufficient detail about intervention methods, and alternatives if the initial strategies do not work"

Further to some responses provided to Question 1, some respondents felt that the children and young people guidance was less user friendly.

"don't think the 11-18 year old document is very young person friendly. It's quite boring and plain and lots of information. It needs to be broken down into more bullet points"

"messages also need to be considered in the context of the development stage and maturity of the child / young person rather than chronological age alone; this would also take account of children/ young people with additional learning needs"

Suggestions for improving the user-friendliness of the guidance included:

"Could this be turned into an app?"

"A visual version or an animation would be helpful for those pupils with ALN [additional learning needs]"

Question 3

Does the guidance on anti-bullying connect properly with broader policy areas and guidance on separate but related topics? Are there links with related areas that are not made in the guidance, which should be made?

Due to rounding, percentages shown in the chart below may not always appear to add up to 100%
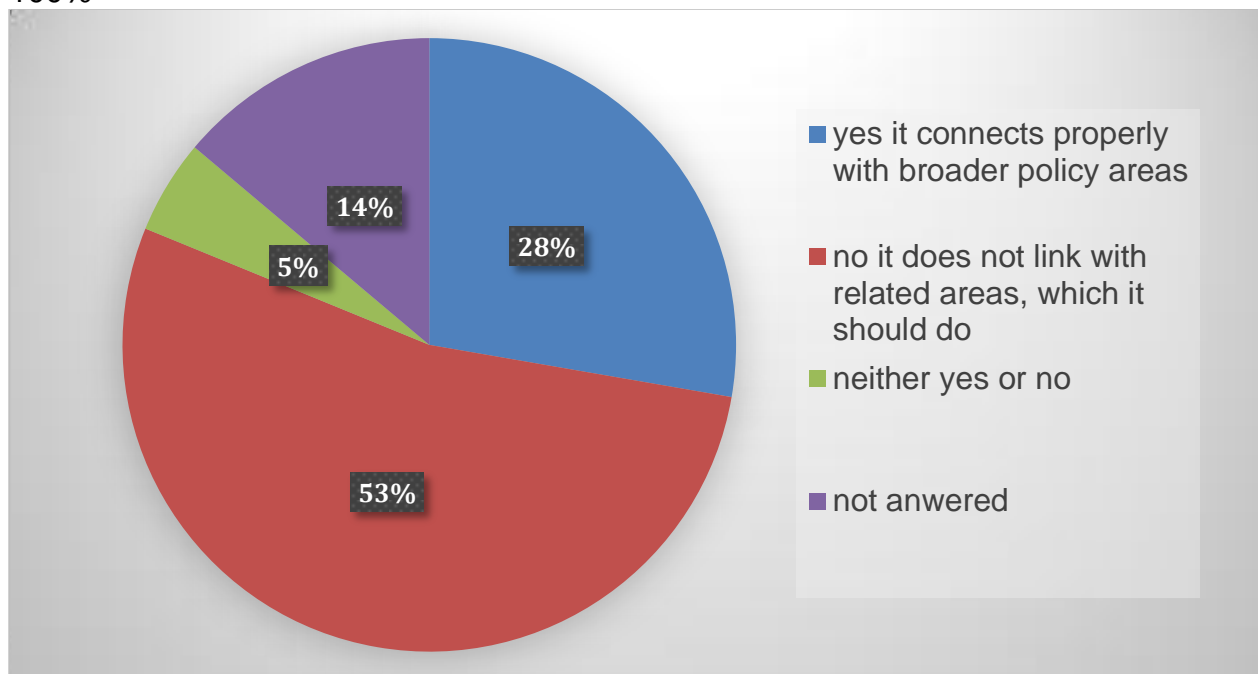
Over half of respondents (53%) thought that the anti-bullying guidance did not link fully with related areas. Specific areas identified included:
- the whole-school approach to mental health and wellbeing
- the new curriculum
- equality and discrimination related to individual protected characteristics
- recording and reporting (particularly in relation to hate crime and public sector equality duty (PSED).

"Links between this guidance/ toolkit and the broader mental health and well-being agenda should be strengthened"

"More clearly linked to the four purposes of the new curriculum"

"There is mention of school's policy on equalities and policies on hate crime, but these links should be made clearer."

Other areas where respondents sought better connections or additional information included:
- digital and online
- rights based approaches
- the role of external agencies and services.

"There is no link to the Welsh Government's Digital Competency Framework..."

"Many links and connections have been made within the body and framework of the documents and tools, and whilst there is reference to the UNCRC… the focus on rights and a rights based approach is not as strong as it could be…"

"Be very clear the circumstances in which a school should involve children's services and the police."

Over a quarter of respondents (28%) reported that the guidance connects properly with broader areas.

"The guidance refers in passing to broader policy areas but there is so much information related to anti-bullying that it may be confusing to refer in detail to many other policy areas."

"It connects well with other policies i.e. attendance, behaviour and safeguarding"

Question 4

Should other areas be included in the anti-bullying guidance which you have not had an opportunity to comment on above? If yes, please provide details.

Due to rounding, percentages shown in the chart below may not always appear to add up to 100%
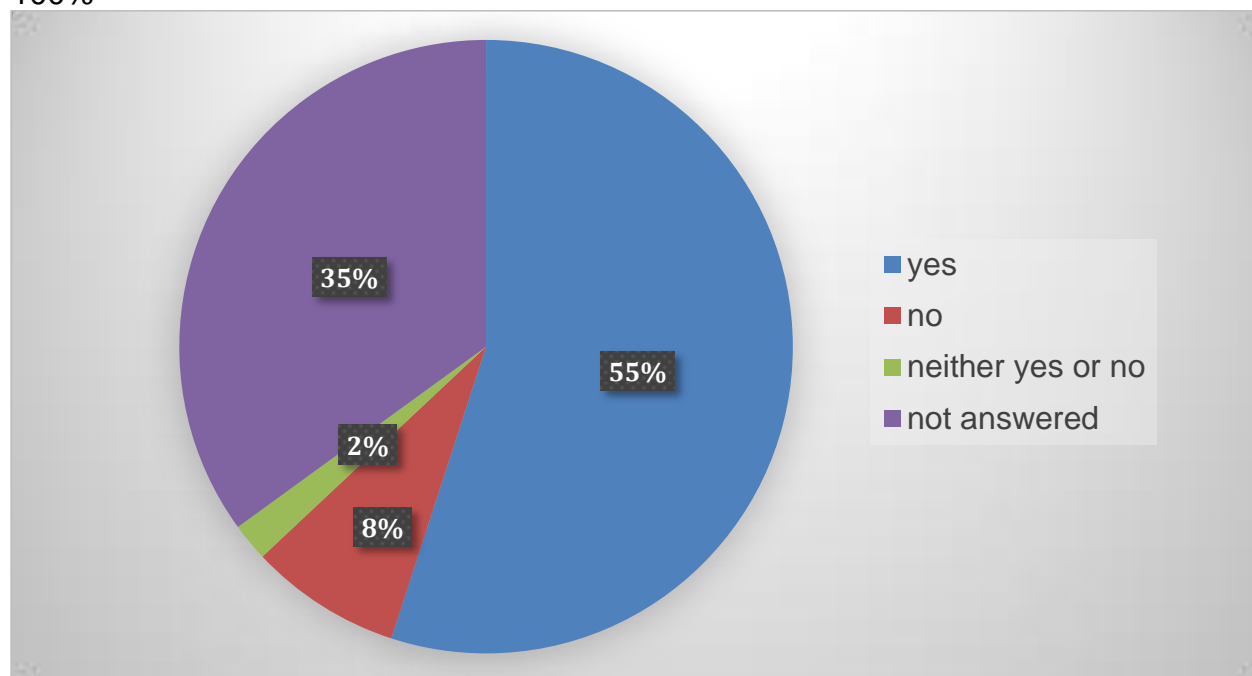
Over half of respondents (55%) thought that other areas should be included in the anti-bullying guidance. In line with Question 3, suggested additional information included:

- recording and reporting
- the new curriculum
- equality and discrimination related to individual protected characteristics.

"The Welsh Government should require schools to gather data on bullying… local authorities should analyse bullying data gathered by schools…"

"The development of the new curriculum in Wales is an opportunity to ensure the principles underpinning this Guidance are embedded in it. It would be helpful if the final Guidance made direct, frequent and explicit references to the new curriculum"

Question 5

On a scale of 1–-5 (1 being 'not at all' and 5 being 'very') how helpful do you find the anti-bullying guidance? Are there improvements you would like to see which you have not had an opportunity to comment on above? (Please put a 'X' in the relevant box.)

The pie chart shown below reflects the percentage ratio of all responses to this consultation question, including where respondents did not answer this question

Due to rounding, percentages shown in the chart below may not always appear to add up to 100%
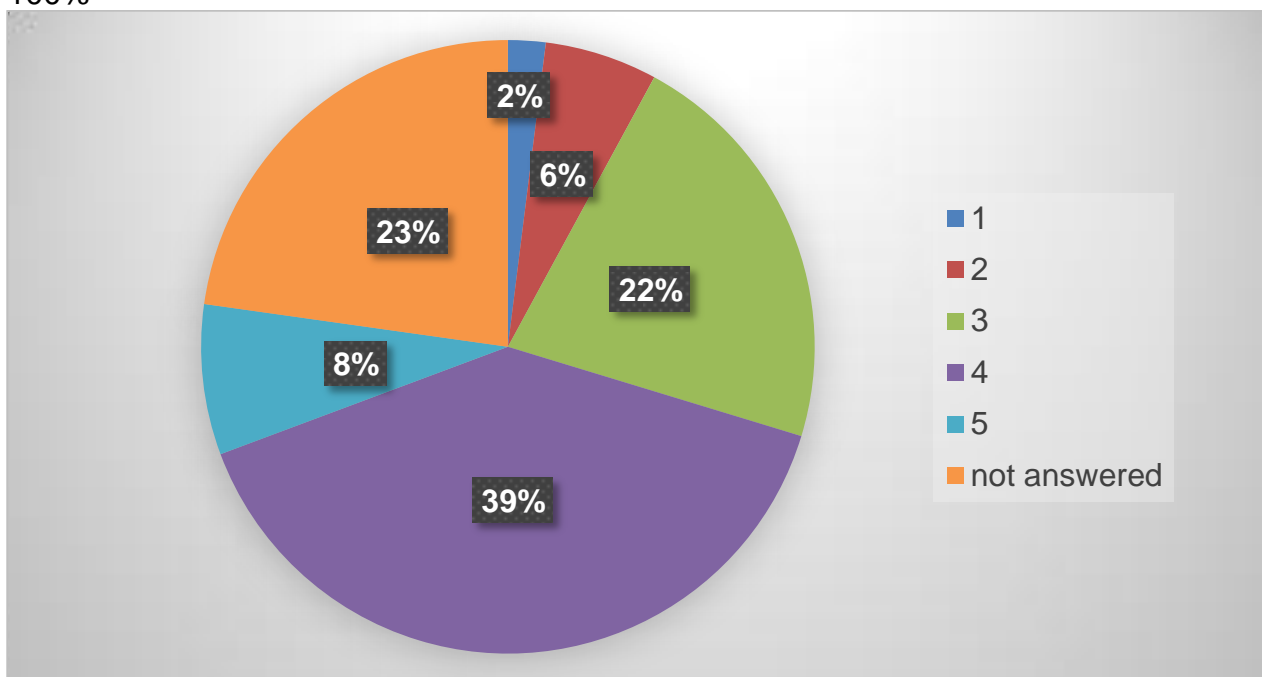
The pie chart shown below reflects the percentage ratio of responses whereby respondents answered this question by marking a score against one of the five score boxes.

Due to rounding, percentages shown in the chart below may not always appear to add up to 100%
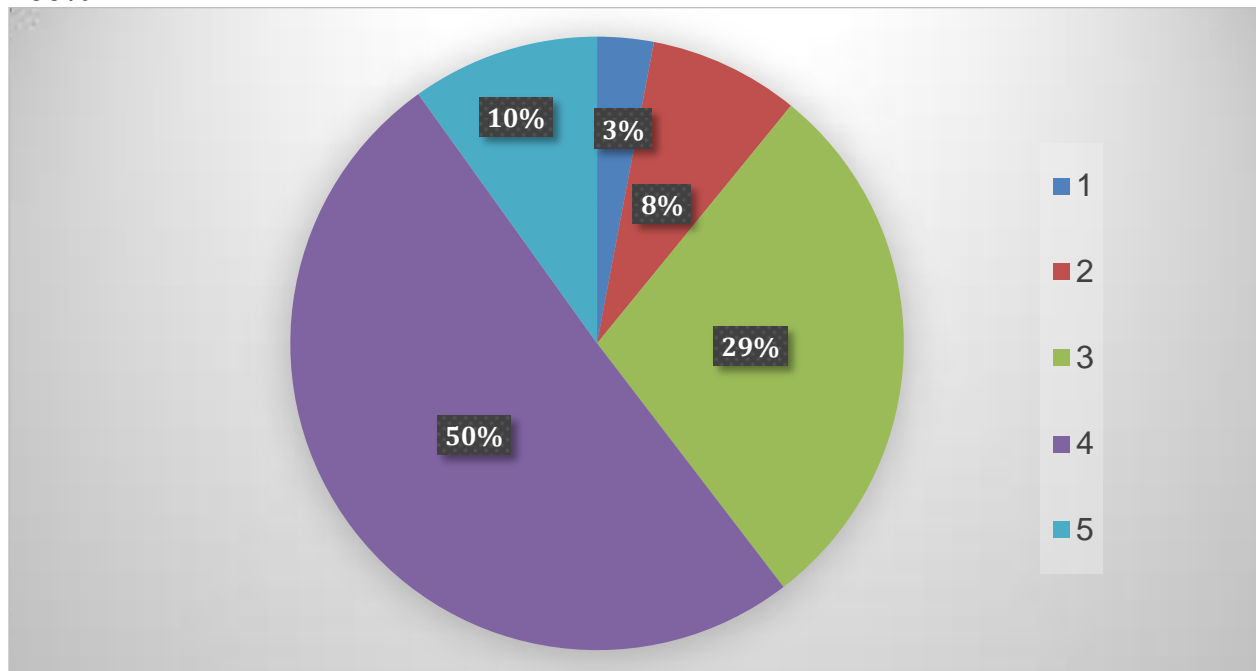
Nine out of 10 respondents rated the helpfulness of the guidance as three or above. 10% of respondents rated the guidance as very helpful. 3% of respondents rated the guidance as not being helpful at all.

Supporting comments included:

"The photographs used throughout need to be revisited. They do not appear to be inclusive of race, gender, disability and so on"

"whilst the content is good it is still down to the schools to admit they have bullying in their schools which is often something they will not admit."

"Parent and pupil engagement must go hand in hand with the guidance or development of school bullying policy".

"the guidance is most helpful in providing an overview of the whole area and putting the information in one place. The definition section is certainly needed and will inform debates in schools".

Question 6

Which of the following titles would you like the anti-bullying guidance to be named? (Please pick one option by putting a 'X' in the relevant box.)

Due to rounding, percentages shown in the chart below may not always appear to add up to 100%
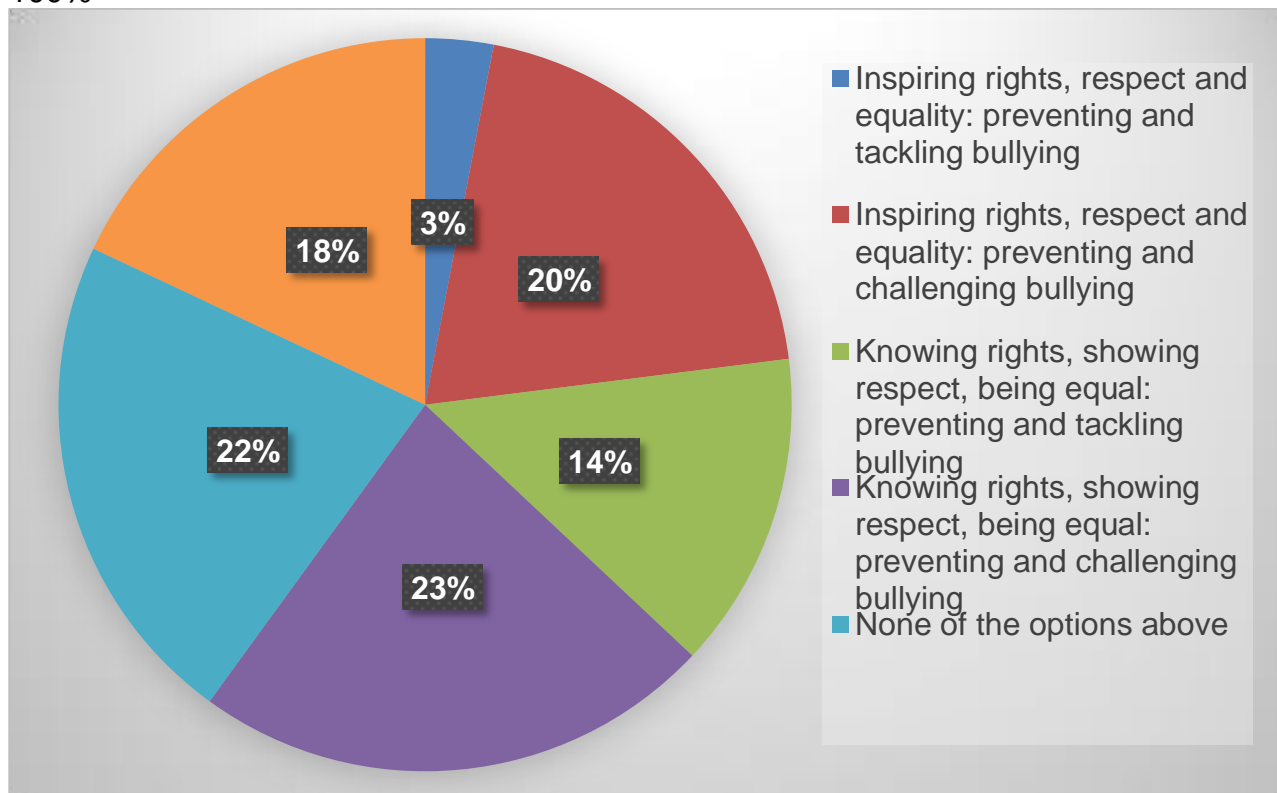
Ranking order of preferred titles	Proposed title:
1st	Knowing rights, showing respect, being equal: Preventing and challenging bullying
2nd	None of the options stated above – please provide an alternative title in the supporting comments box
3rd	Inspiring rights, respect and equality: Preventing and challenging bullying
4th	Knowing rights, showing respect, being equal: Preventing and tackling bullying
5th	Inspiring rights, respect and equality: Preventing and tackling bullying

Alternative title suggestions proposed:
- *"Respecting others: preventing and tackling bullying"*
- *"NO to bullying"*
- *"Anti-bullying guidance 2019"*
- *"Inspiring respect, rights, responsibility and equality. Work towards a bully-free society"*

15

- *"The right to be respected – preventing and tackling bullying"*
- *"How to beat bullying!"*
- *"A shared understanding of respectful relationships, developing inclusion and equality in schools"*
- *"Developing inclusion and equity in schools through a shared understanding of respectful relationships"*
- *"Respecting others"*
- *"A guide to non-bullying"*
- *"Preventing and challenging bullying: inspiring rights, respect and equality"*
- *"Respecting Others: Inspiring rights, respect and equality – preventing and challenging bullying"*
- *"Understanding rights, showing respect, being equal: Preventing and tackling bullying".*
- *"Making our rights real – feeling safe, confident, listened to…"*

Anti-bullying Resource toolkit

Question 7

On a scale of 1–5 (1 being 'not at all' and 5 being 'very') how useful do you find the resource toolkit in supporting the practical application of the anti-bullying guidance?

The pie chart shown below reflects the percentage ratio of all responses to this consultation question, including where respondents did not answer this question

Due to rounding, percentages shown in the chart below may not always appear to add up to 100%
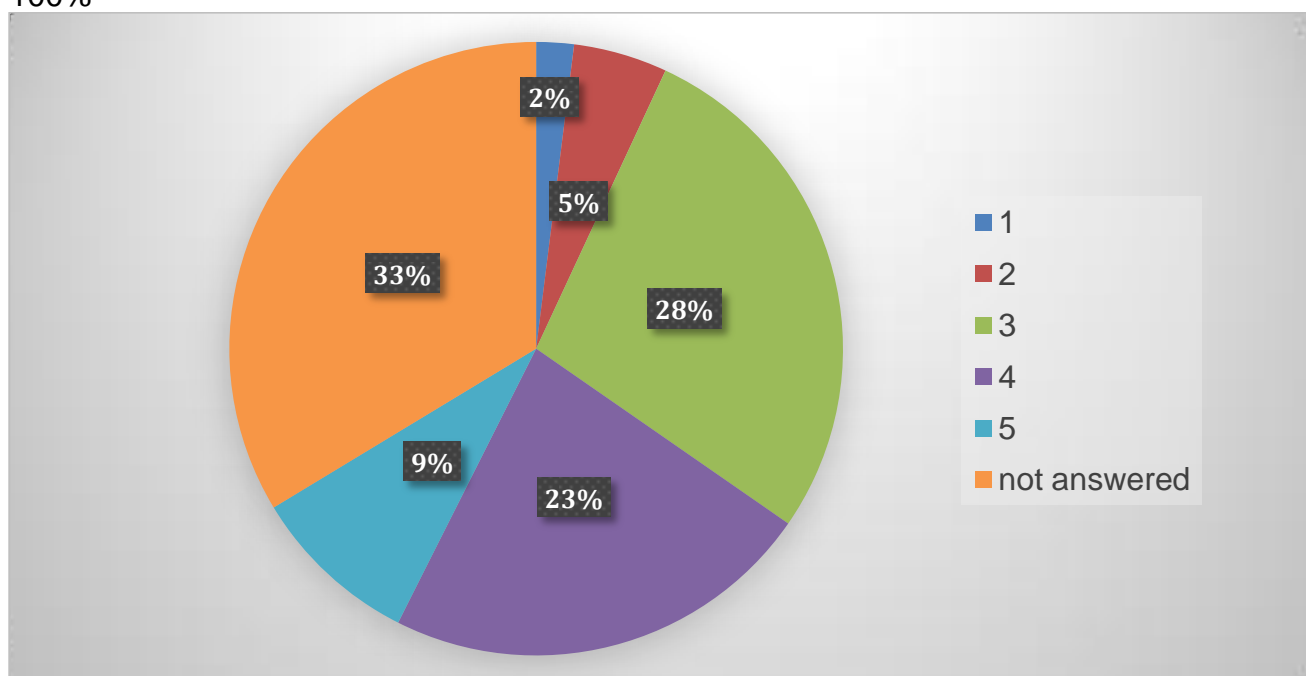
The pie chart shown below reflects the percentage ratio of responses whereby respondents answered this question by marking a score against one of the five score boxes.

Due to rounding, percentages shown in the chart below may not always appear to add up to 100%
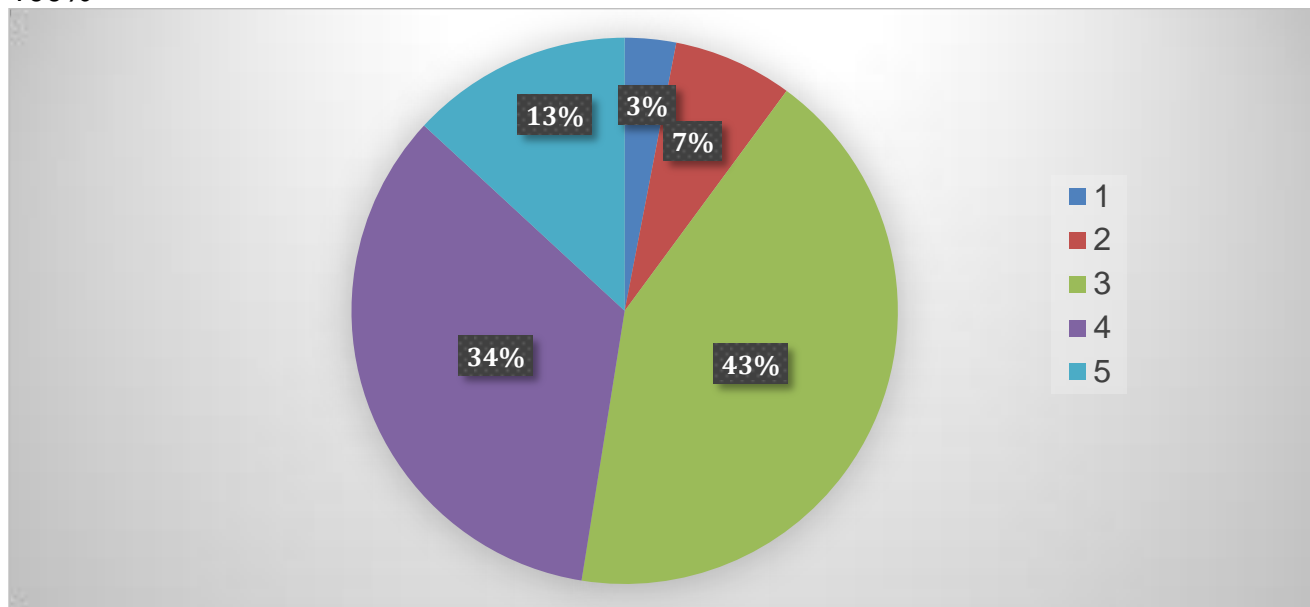
Nine out of 10 respondents rated the usefulness of the toolkit as three or above. 13% of respondents rated the toolkit as very useful. 3% of respondents rated the toolkit as not being useful at all.

Supporting comments included:

"easy to access but lots of it – might schools be overwhelmed?"

"it is visual and helps to reinforce and illustrate the main messages held within the guidance… where more interactive, it holds people's attention more and is more accessible."

"the idea of having an additional resource toolkit is good. It has the potential to be very useful, if properly planned and regularly updated."

"currently, it is more a curated bibliography than a practical toolkit… useful would be summaries of those key documents and policies."

Question 8

On a scale of 1–5 (1 being 'not at all' and 5 being 'very') how accessible do you find the resource toolkit?

The pie chart shown below reflects the percentage ratio of all responses to this consultation question, including where respondents did not answer this question

Due to rounding, percentages shown in the chart below may not always appear to add up to 100%
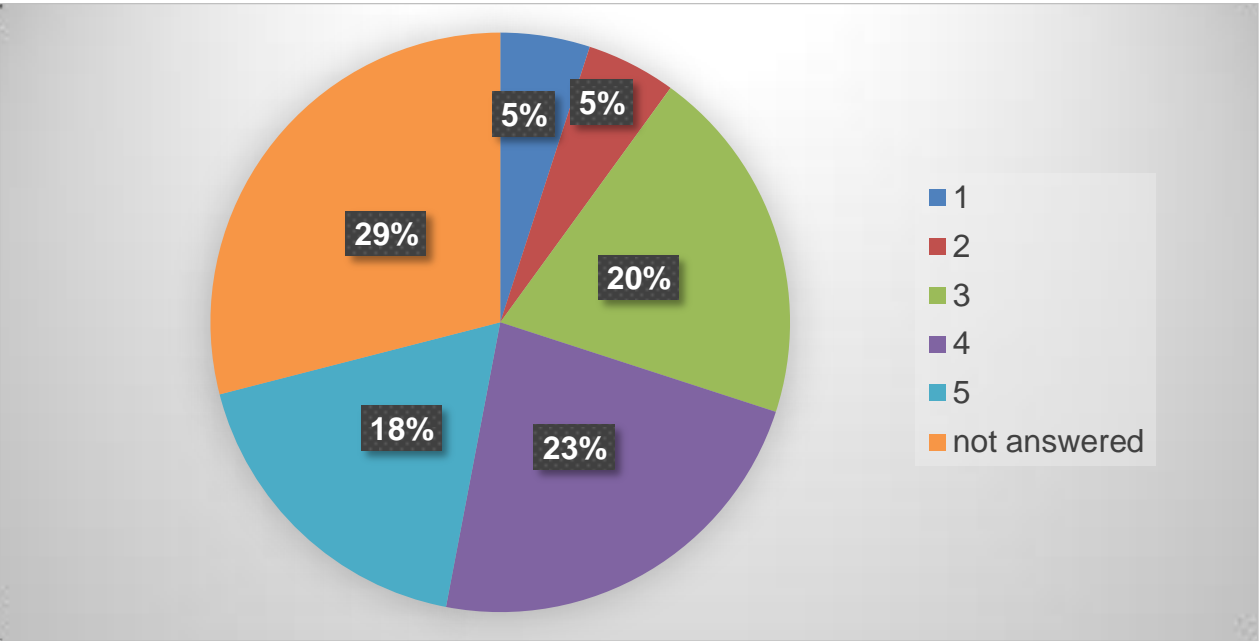
The pie chart shown below reflects the percentage ratio of responses whereby respondents answered tis question by marking a score against one of the five score boxes.

Due to rounding, percentages shown in the chart below may not always appear to add up to 100%.
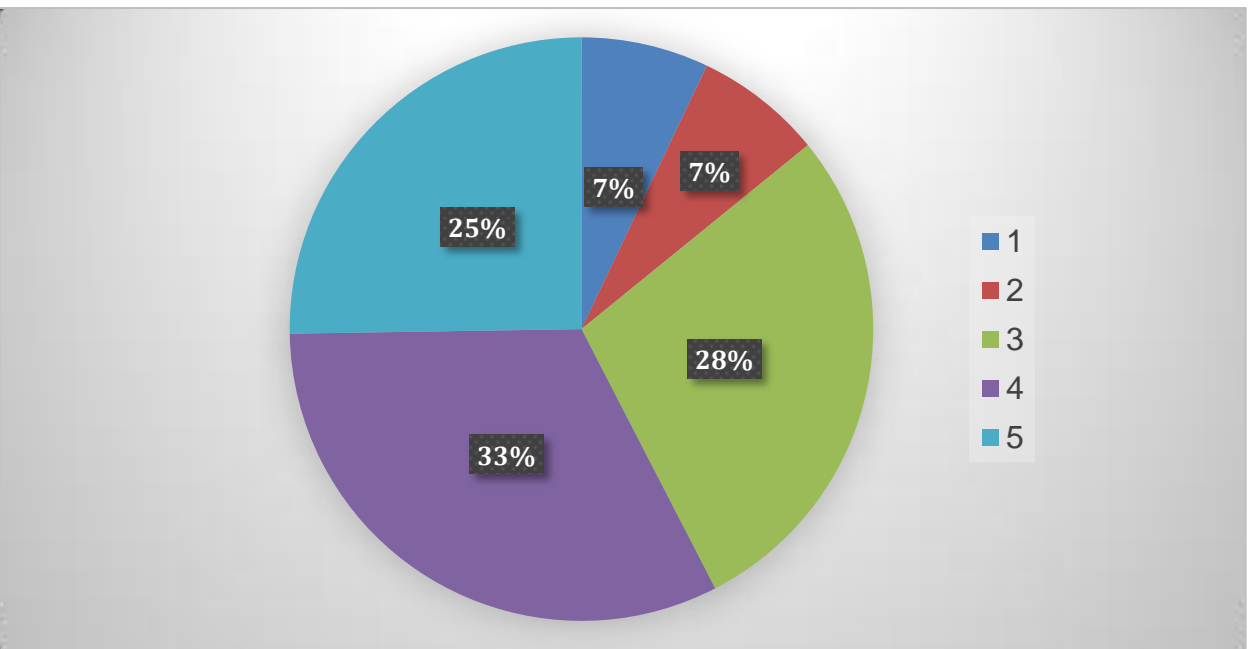
Over three quarters (86%) of respondents rated the accessibility of the toolkit as three or above. 25% of respondents rated the toolkit as very useful. 7% of respondents rated the toolkit as not being useful at all.

Supporting comments included:

"organising the tools and resources effectively is crucial to navigation… these could be organised by theme, age range, type of audience, type of resources, English only resource, bilingual resource, other languages resources (including sensory impaired)."

"Whilst dividing it up into sections that link to the chapter headings, a list of titles without an explanation of what they are, means that it is hard to find useful resources."

"easy to find and use but may prove a little overwhelming if resources are not signposted."

Question 9

Are there any particular resources within the toolkit you find useful? If yes, please state which and why they are useful.

Due to rounding, percentages shown in the chart below may not always appear to add up to 100%
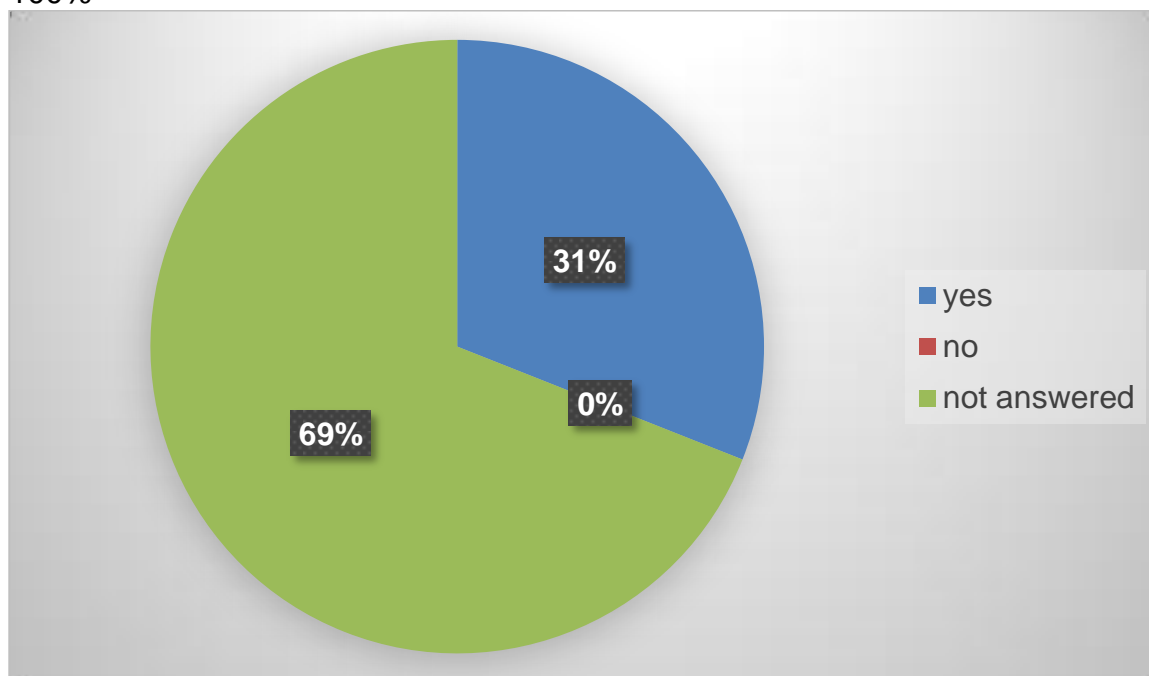
Respondents highlighted a number of resources they deemed particularly useful. Of the sample resources made available, those cited as being most useful were:

- Banter / Bullying video (however a number of respondents noted this resource was only available in English)
- Sam's Story
- Factsheets for tackling discriminatory bullying

- Bullying incident recording form template

Supporting comments included:

"the use of video is good: clear, memorable way to communicate the issues."

"the section on specific types of bullying and Prejudice based bullying is a really good section. Very useful in a changing world!"

"the restorative practice and Sam's Story resources appear particularly useful for school leaders when planning a whole school approach that involves wider stakeholders."

"particularly welcome the inclusion of both a bullying incident recording form and an online bullying incident recording form…"

Question 10

Are there any particular resources within the toolkit you don't find useful? If yes, please state which and why are they not useful.

Due to rounding, percentages shown in the chart below may not always appear to add up to 100%
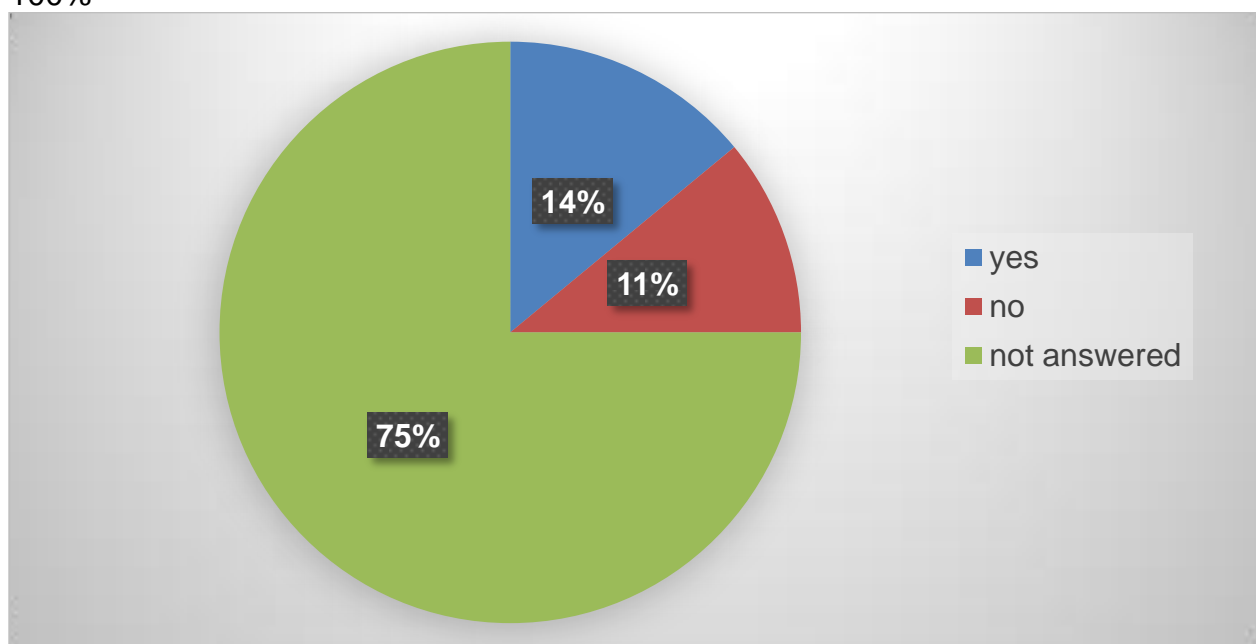
Respondents highlighted a number of resources they deemed not particularly useful. Of the sample resources available, those cited as least useful were:

- 'What is or isn't Bullying' cards
- Law relating to bullying section

Supporting comments included:

"Too many policy type documents that bombard the user with similar information"

""I wish my teacher knew…" resources be amended. Currently it only includes a smiley face, which could be confusing for some pupils… it should also include a sad face so that pupils can see that it can also be used to tell someone that they are feeling sad."

"The video in the toolkit should represent racial diversity. It currently does not. Perhaps, more videos with different kinds of bullying scenarios would help in identifying and dealing with identity-based bullying."

Question 11

The resource toolkit is continuing to be developed, only a snapshot of the resources we anticipate being available have been made available as part of this consultation. To inform this ongoing work, are there areas or topics on which resources are not currently available which you would like to see included in the final version of the toolkit?

Due to rounding, percentages shown in the chart below may not always appear to add up to 100%
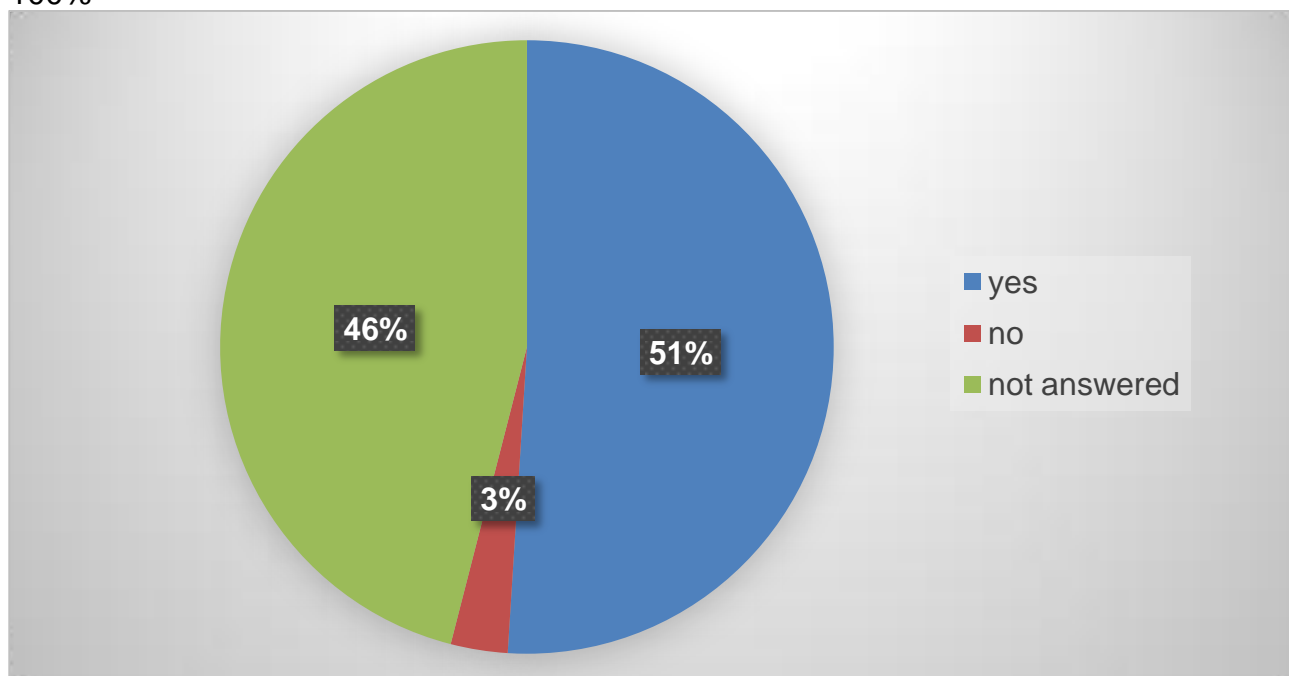
Several respondents highlighted that it would have been beneficial to have had all the resources intended for inclusion in the final version during the consultation period. Respondents did, however, provide suggestions for the further development of the toolkit, including:

"[Equality and Human Rights Commissioner] anti-bullying resources, and in particular, the case study… developed with Crickhowell High School, in respect of cyberbullying and sexting."

"signpost to Schoolbeat.org where there are resources available for pupils, teachers, and parents about bullying."

"Flowcharts can provide an 'at a glance' quick procedure to follow which can be kept in view for staff and young people."

"Girls bullying and how to prevent and tackle it… consequences for schools that do not respond appropriately."

"EWC [education workforce council] Code of Professional Conduct and Practice"

"whole school participation in the development of anti-bullying strategies… this advice would be stronger if it was accompanied by tools for practitioners showing how whole-school consultative exercises could be effectively led."

"clearer guidance around 'appropriate agencies or services', this could link to the toolkit."

"Specific sections on each of the following types of prejudice based bullying: Bullying against religious and ethnic groups; Gender based bullying; Homophobic and transphobic bullying; Disability based bullying."

"The Right Way: A Children's Rights Approach for Education in Wales should appear in the prevention section of the toolkit."

"A section on family engagement and also a section illustrating how recording can be used effectively to monitor and plan interventions."

"A section linking to research pilots and case studies, including opportunities for how schools can be part of ongoing research or developments. It would be useful to include key findings from the initial and larger KiVa prevention trial in Wales in this section and also to include key findings relating to restorative approaches that have been developed by schools in Wales."

"the toolkit should also showcase and disseminate real examples of best practice."

"more resources around challenging sexism and sexual bullying are needed."

"[Stonewall] resources, in particular Getting Started toolkits on tackling homophonic, biphobic and transphobic bullying and… Introduction to Supporting LGBT Young People."

"Helpful to include the list of agencies that can help children and young people directly… so that school staff can refer children and young people to them for further support as necessary."

"ProMo-Cymru with Meic have developed a range of content to accompany various anti-bullying campaigns, all of which are accessible on Meic's website"

"appropriate terminology for promoting equality and tackling racism".

"an online section that young people can access themselves. A place young people can report bullying whether it is anon or identified".

"organisations that produce information and guidance on equality issues and bullying… Stonewall… Education support Partnership…Anti-bullying Alliance… LGBT History Month

(formerly Schools OUT UK)… Cutting Edge Consortium…Families and Friends of Lesbian and Gays… Educational Action Challenging Homophobia (EACH)… Gender Intelligence."

"helpful for Catholic schools for a link to be made with Catholic Education Services Guidance."

Question 12

We would like to know your views on the effects that revising the anti-bullying guidance would have on the Welsh language, specifically on:

I.   opportunities for people to use Welsh

II.   treating the Welsh language no less favourably than the English language.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

In total, just over half (52%) of respondents did not answer this question or replied '"no comment".

Of the 48% of respondents who answered this question:
- 26% outlined that the anti-bullying materials should be available bilingually
- 9% stated that there are no implications on the Welsh language or that the Welsh language is not relevant to the consultation
- 3% noted that if all the anti-bullying materials are not available bilingually there may be a negative impact on the Welsh language
- 2% noted a positive impact on the Welsh language
- 8% provided general comments, which did not directly relate to the question

Question 13

Please also explain how you believe the revised anti-bullying guidance could be formulated or changed so as to have:

I.   positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language

II.   no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Nearly three quarters (74%) of respondents did not answer this question or replied "no comment".

Of the 27% of respondents who answered this question;
- 14% outlined that the anti-bullying materials should be available bilingually
- 3% stated that there are no implications on the Welsh language or that the Welsh language is not relevant to the consultation
- 2% noted that it was unknown how the revised anti-bullying guidance could be formulated or changed to increase positive effects / have no adverse effects on the Welsh language
- 8% provided general comments, which did not directly relate to the question

Question 14

We have asked a number of specific questions. If you have any related issues, which we have not specifically addressed, please use this space to report them.

Just under half (46%) of respondents provided feedback to this question. A number of respondents reiterated statements already provided in response to earlier questions. New or supplementary points noted included:

"recommend that recording incidents of bullying in schools should not only be a suggestion but a requirement".

"more information is required on how to deal with bullying when it is outside of the school"

"The ALN terminology of the new ALN Act and Code needs to be used instead of SEN through."

"We believe that WG should follow examples from countries such as France in their All Equal, All Allies campaign; Australia with their Safe Schools programme, and Finland with their KiVa programme, whilst providing detailed leadership related to the reporting and treatment of LGBTQ+ bullying."

"more information on how staff can recognise changes in children's behaviour and spot difficulties as some children will not approach adults or take the initiative."

"the status of respecting others guidance is that it gives advice and suggestions to schools, which they can choose to ignore."

"there needs to be guidance created and disseminated to adults too. Bullying in the workplace is endemic in Wales. It needs to be formally considered and addressed."