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Welsh Government  
Consultation – summary of response

# Rights, Respect, Equality Anti-bullying Guidance Consultation

Challenging bullying and harassment

November 2025

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.  
This document is also available in Welsh.

## Overview

This document provides a summary of responses to our consultation on the Rights, Respect, Equality Anti-bullying Guidance Consultation. This consultation was published on 19<sup>th</sup> May 2025.

## Action Required

This document is for information only.

## Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

Link to the consultation documentation: [Rights, respect, equality anti-bullying guidance](#)

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## Additional copies

This summary of response and copies of all the consultation documentation are published in electronic form only and can be accessed on the Welsh Government's website.

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# **1 Executive summary**

## **1.1 Introduction and methodology**

The consultation covered proposed amendments to the Rights, Respect, Equality anti-bullying guidance, and also asked questions about a potential change to the Education (School Premises) Regulations 1999 in relation to toilet provision, an area which has been highlighted as one where bullying occurs. This document covers all the questions from the consultation.

In total 242 consultation responses were received. Of these, 211 consultation responses used the template provided; 30 email submissions followed the format of the consultation questionnaire; and one submission did not follow the format of the questionnaire.

The Welsh Government commissioned Strategic Research and Insight Ltd (SRI) to independently analyse and report on the responses to the consultation. As part of the commission to analyse consultation responses, SRI was also tasked with organising and moderating two stakeholder workshops. A total of 16 organisations participated in the workshops, with 19 participants attending across the two sessions.

The report is structured according to the questions in the consultation response form. This typically consisted of a closed question followed by an open question. The open question allowed respondents to provide additional, contextual comments alongside their response to the closed question.

Responses to the open questions have been summarised by identifying key themes that emerged under each question. Each open question also includes a 'base', the number of individuals who provided open comments, as not all respondents answered all questions or chose to elaborate on their closed responses by answering the open questions.

This distinction is important, as many of the open comments expressed negative views about the guidance, whereas the closed question responses were generally more positive. This suggests that those who chose to provide open feedback may have been more critical of the guidance than those that did not.

## **1.2 Question results synopsis**

Overall, responses to the closed questions were broadly positive. Around three quarters of respondents felt that the draft guidance provides practical and useful information (74%), is clearly explained (75%), and is user-friendly (72%). A similar proportion (76%) said that it clearly outlines the legal responsibilities of schools and governors, while 69% said it clearly sets out the responsibilities of local authorities. Most respondents (82%) also felt that the guidance appropriately includes learners with protected characteristics. While (73%) agreed that the Education (School Premises) Regulations 1999 should be amended, 20% disagreed.

Open comments presented a more varied picture. The most common themes raised across the consultation were as follows:

- Many respondents commented on how the guidance addresses issues of sex and gender. Opinions were often divided: some welcomed its recognition of transgender and non-binary

learners, including needs regarding access to toilet facilities, while others questioned whether it aligns with recent legal rulings such as the Supreme Court decision and the Cass Review.

- Many respondents felt that the draft guidance could be clearer and simpler to apply. Some said it focuses too heavily on theory rather than outlining clear steps for schools to take, and suggested concise summaries, visual aids, or case studies to make it easier to apply.
- Some of the comments focused on the challenges of putting the guidance into practice. Respondents suggested a need for additional staff training and sufficient resources to support schools, noting that heavy workloads may limit the capacity to adopt new approaches effectively.
- Some respondents expressed concerns about the overall length of the document and the number of references to other materials. Some of these respondents suggested shorter or audience-specific versions to improve accessibility and ease of use.

### **1.3 Conclusion from the workshops**

While the guidance was seen as a positive step, participants felt the extent of its impact would depend on clearer language, practical tools, and training and support for education practitioners, as well as consistent data collection and monitoring. They welcomed its alignment with national priorities such as the Anti-Racist Wales and LGBTQ+ Action Plans, and praised its focus on tackling prejudice-based bullying and promoting wellbeing. However, participants felt that the document is lengthy and complex, with some calling for a clearer structure, visual aids, or audience-specific resources to make it easier to read.

### **1.4 Next steps and concluding remarks**

Following the consultation the Welsh Government will commence with the revisions to the guidance to reflect the comments received and intend to publish the final version of the Rights, Respect, Equality guidance in the new year. Any subsequent work to progress amendments to the Rights, Respect, Equality guidance will progress separately to the work relating to the Education (School Premises) Regulations 1999.

This executive summary provides a snapshot of the findings; full analysis can be found in the following pages.

## 2 Introduction

### 2.1 Background and context

The Welsh Government seeks to support schools to work towards developing positive and respectful relationships amongst children and young people. To this end, the Welsh Government published its 'Rights, respect, equality: guidance for schools' in 2019. In 2025, the Welsh Government published a draft updated version of this guidance, to reflect new laws, new research, and the changing issues facing children.

On 19<sup>th</sup> May 2025, the Welsh Government opened a consultation on draft guidance, with the consultation closing on 31<sup>st</sup> July ([Rights, respect, equality anti-bullying guidance consultation](#)).

Welsh Government sought the views of stakeholders, including children and young people, parents and carers, education practitioners, public services and voluntary and third sector organisations, to ensure the revised guidance meets the needs of all users.

The guidance aims to:

- support schools to work towards developing positive and respectful relationships amongst children and young people
- strengthen the guidance in respect of bullying on the grounds of prejudice and race
- take account of the impact bullying can have on a learner's mental health and wellbeing
- set out how schools should work in partnership with others, including the NHS and third sector organisations
- send a clear message that bullying is unacceptable and will not be tolerated

Strategic Research and Insight Ltd (SRI) were appointed to independently analyse and report on the responses to the consultation, as well as to arrange and facilitate two workshops with representative organisations working in this area. More details are provided in the methodology section overleaf.

## **3 Methodology**

### **3.1 The consultation responses**

The online consultation response form consisted of 12 closed questions, each with a 'supporting comments' box to allow respondents to elaborate on their closed response. There were a further three open questions towards the end of the consultation response form.

The consultation response form could be completed by individuals as well as organisations. 212 consultation responses were received online. However, an email submission superseded one of these responses, resulting in a total of 211 valid consultation responses.

In addition, 30 submissions were received by email which followed the format of the consultation response form (with and without introductions/prefaces) and were combined with the online responses for analysis.

13 of the email submissions included introductions/prefaces. These did not follow the format of the consultation questionnaire, and have therefore been analysed and reported on separately.

There was one submission which did not follow the format of the consultation questionnaire, and as such, has been analysed and reported on separately from the combined response form responses. This was a report from the organisation Children in Wales, which provided feedback from children across three different settings in Wales: a Young Wales Advisory Board session, a primary school, and a secondary school. In addition, Children in Wales engaged with their wider Young Wales membership by distributing the secondary school consultation document and inviting members to complete a questionnaire to give feedback via Microsoft Forms.

In total, there were a combined 241 individual responses to the consultation questionnaire, and one further submission, noted above.

All open-ended responses received, regardless of format of submission, have been read and classified thematically using a standardised coding frame. The main themes raised are summarised in following chapters of the report.

### **3.2 Workshops**

As part of the commission to analyse consultation responses, SRI was also tasked with organising and moderating two stakeholder workshops. The target audience included organisations working in the fields of anti-bullying and harassment, children's charities, LGBTQ+ advocacy, mental health, minority ethnic and Roma Traveller communities, neurodiversity, race, religion and ethnicity, and special educational needs (SEN)/ additional learning needs (ALN)/disability representation.

A total of 16 organisations participated in the workshops. Each organisation was invited to nominate one representative, although some requested to send two. In total, 19 participants attended across the two sessions, 8 in the first workshop held on 7th August, and 11 in the second on 13th August.

Each workshop lasted 90 minutes and was conducted via Zoom. Participants were provided with the topic areas and discussion questions in advance, allowing them to prepare their responses if they wished.

To help structure the discussion, SRI began each session by asking participants to respond to two questions via Mentimeter. These questions aimed to gauge participants' familiarity with both the guidance and the consultation response. The results of these questions are presented below:

<b>How would you rate your familiarity with the revised Rights, respect, equality anti-bullying guidance?</b>	<b>Group 1</b>	<b>Group 2</b>	<b>Total</b>
1: Not familiar at all	-	-	-
2: Slightly familiar	4	2	6
3: Moderately familiar	1	7	8
4. Very familiar	1	1	2
5. Extremely familiar	1	1	2
No response	1	-	1
Total	8	11	19

<b>Did you respond to the Rights, respect, equality anti-bullying guidance consultation (2025)?</b>	<b>Group 1</b>	<b>Group 2</b>	<b>Total</b>
Yes	2	8	10
No	5	3	8
No response	1	0	1
Total	8	11	19

### 3.3 Format of the report

The report is structured according to the questions in the consultation response form. This typically consisted of a closed question followed by an open question. The open question allowed respondents to provide additional comments alongside their response to the closed question.

Responses to the open questions have been summarised by identifying key themes that emerged under each question. Each open question also includes a 'base', the number of individuals who provided open comments, as not all respondents chose to elaborate on their closed responses.

This distinction is important, as many of the open comments tend to express negative views about the guidance, whereas the closed question responses are generally more positive. This suggests that those who chose to provide open feedback may have been more critical of the guidance.

While coding frames indicate respondents' key concerns and the strength of feeling about certain issues, the number of responses is not the only factor to take into consideration for decision-makers. The frequency of key themes cannot be used to interpret the balance of views in the same way that a closed question can.



The summary is loosely ordered by the most frequently occurring themes.

Quotations from respondents are shown throughout the report. Quotations from respondents serve to elaborate on and illustrate key themes, but do not necessarily represent all comments.

### 3.4 Demographics

The consultation included questions asking respondents whether they lived in Wales, whether they had a business interested in Wales, as well as first part of their postcode, their name, and the organisation they were from.

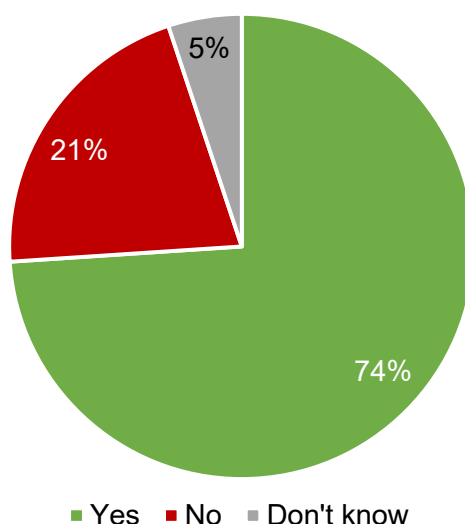
<b>Table 1: Respondent country</b>	<b>Number</b>	<b>Percent</b>
Lives in Wales	136	56%
Lives outside of Wales	75	31%
No response	30	12%
<b>Total</b>	<b>241</b>	<b>100%</b>

<b>Table 2: Business interest in Wales</b>	<b>Number</b>	<b>Percent</b>
Has a business interest in Wales	55	23%
Does not have a business interest in Wales	144	60%
No response	42	17%
<b>Total</b>	<b>241</b>	<b>100%</b>

<b>Table 3: Respondent type</b>	<b>Number</b>	<b>Percent</b>
Individual / not specified	200	83%
Organisational response	41	67%
<b>Total</b>	<b>241</b>	<b>100%</b>

## 4 Consultation Survey Responses

### 4.1 Question 1 – Does the draft Rights, respect, equality guidance on anti-bullying provide suitable useful, practical information for leaders, teachers and other practitioners in schools, pupil referral units and education otherwise than at school settings to inform approaches to preventing and responding to all forms of bullying?



**Base: 215 respondents**

Around three quarters (74%) of respondents said that the guidance provides suitable useful, practical information to inform approaches to preventing and responding to all forms of bullying. Around one in five (21%) disagreed and 5% said that they don't know.

Respondents were given the opportunity to elaborate on their answer, by providing a free-text response to a follow-up open question. The responses have been coded into themes which are shown in the table below.

Code	Count	%
Guidance is clear / good / practically useful for the audience	50	47%
Not clear enough on issues of gender and biological sex / doesn't sufficiently address the recent Supreme Court ruling	27	25%
Guidance is vague / not clear / practical	25	24%
Specific areas of bullying that have been included in the guidance are good/important	23	22%
Concerns/comments about implementation / delivery (funding/ staffing)	22	21%
Concerns about length / over detailed / has too many references to other documents	12	11%
LGBTQ+ bullying not sufficiently covered in the guidance	4	4%
Terminology comments	3	3%
Other	9	8%

**Base: 106 respondents**

Almost half (47%) of comments generally agreed that the draft guidance is clear, comprehensive, and practically useful. These respondents often noted that the guidance

provides accessible, well-organised information, and practical advice that education practitioners can use.

Some described it as clear because of its straightforward definitions of bullying, and the way it distinguishes one-off incidents from repeated behaviours. Those describing it as a positive piece of guidance sometimes did so citing the fact that the guidance promotes a whole-school ethos, inclusivity, respect, and wellbeing, and a clear message that all forms of bullying are unacceptable. Finally, these responses often noted that they found the guidance to be practically useful, for example, for different staff and types of educational settings.

‘Overall, the draft guidance is comprehensive, practical, and well-designed to support school leaders, teachers, and other practitioners across a range of settings in Wales. It offers a clear framework for tackling bullying in a way that is both inclusive and evidence-based. It is both suitable and practical for leaders, teachers, and support staff working in maintained schools, pupil referral units (PRUs), and education otherwise than at school (EOTAS) settings. It draws on research, aligns with legislative duties, and reflects recent societal and educational developments.’

A quarter of responses (25%) related to comments on gender and sex, particularly around the recent Supreme Court Ruling, as well as the Cass Review. These comments were split between two viewpoints, those who disagree with the recent ruling, fearing its effect on transgender people, and those who feel that Welsh Government should revisit this guidance in light of that ruling. These two contrasting viewpoints were common throughout the responses. We explore this topic more under question 5, where a greater proportion of responses focused on this issue, and where the responses better fit under this question.

The next most common theme (24%) was that draft guidance is vague, unclear, not simple enough or practical enough. Some of the comments relating to vagueness felt that it was too theoretical, focusing too much on theory or broad points without outlining clear actionable steps that education practitioners can take. These respondents sometimes called for concise summaries, flowcharts, or case studies to make the guidance easier to apply. In terms of clarity and consistency, some felt that key terms (e.g. bullying, harassment, sex, gender, gender identity) were blurred or not legally accurate, potentially undermining the reliability of the advice.

Around one in five (22%) of the responses welcomed the inclusion of particular areas of bullying. Specific praise was given to the inclusion of:

- Peer-on-peer sexual harassment
- Racist bullying, linked to the Anti-Racist Wales Action Plan
- Homophobic and transphobic bullying, with clear definitions of these
- Bullying of disabled learners
- Bullying of migrant, asylum-seeking, and refugee children
- Discrimination against Traveller communities
- Non-physical bullying such as discriminatory language, banter and exclusion
- Online bullying, including details such as difficulties if the perpetrator is anonymous, and possible wider distribution or involvement of bullying through online channels
- Links to wider issues such as mental health, trauma, poverty, and social stigma

A similar proportion of comments (21%) focused on implementation. This included calls for greater training, with some concerns that staff are ill-equipped to deal with bullying. Staffing and workload pressures were raised, also stating that teachers already overstretched and lacking capacity to take on further responsibilities related to anti-bullying and harassment. Related to these were comment on funding, with these respondents saying that new interventions, approaches, or greater monitoring will require investment from the school, for example, where training is needed.

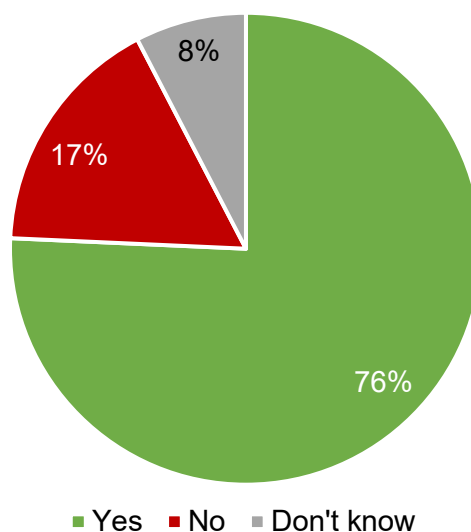
‘The guidance assumes schools will be able to implement new practices but does not address funding or staffing implications or the need for professional development and ongoing training. The guidance is resource intensive in its expectations e.g. regular staff training, detailed data collection, and co-construction of policies. Whilst these are clearly important in practice, it may be difficult to implement to the degree expected within the guidance. Could there be a core compliance aspect that is more practical to implement in reality, with advanced compliance that could be developed over time or where schools have greater capacity.’

Of the remaining themes, 11% of comments related to concerns around the length of the guidance, including the number of references to other documents; 4% felt that LGBTQ+ bullying is not sufficiently covered in the guidance; and 3% (or 3 responses) provided comments on terminology. This includes adding the definition of ‘cisgender’ in the glossary, whilst the other responses provided queries on specific wording with the document, shown below:

‘...the text under ‘Dealing with sexist bullying on Page 5 of the consultation document for secondary schools may need to be challenged when referencing ‘groping’ and [we] feel that this is a sexual assault. When looking through the ‘Schools guidance document on bullying and harassment’ there does not seem to be a definition for groping, sexist bullying or groping referred to throughout. There is only a small reference to sexist bullying on Page 38 in this document’

‘I would also add that a rephrasing on one part in the easy reading booklet: "• who you are attracted to, for example, girls, boys or both" this phrasing leads to a gendered binary when addressing the attraction to people, it would be better to phrase it as: "Who you are attracted towards, no matter your or the person you are attracted towards gender’

## 4.2 Question 2 – Does the Rights, respect, equality anti-bullying guidance clearly set out the legal responsibility of the school and governors?



**Base: 210 respondents**

The results for question 2 are very similar to those for question 1. Around three quarters (76%) of respondents said that the guidance clearly sets out the legal responsibility of schools and governors. Around one in five (17%) disagree and 8% said they don't know.

Respondents were given the opportunity to elaborate on their answer. The responses have been coded into themes and are shown in the table below.

Code	Count	%
Guidance clearly explains relevant roles and responsibilities	35	48%
Comments about issues of gender and biological sex	18	25%
Legal responsibilities not clearly distinguished or presented / too much information / not practical	16	22%
Suggestions for additional clarity	15	21%
Issues with implementation / comments on implementation	10	14%
Query over legality of document	5	7%
See previous response	1	1%
Other	2	3%

**Base: 74 respondents**

Almost half (48%) of comments agreed that the guidance clearly explain relevant roles and responsibilities. They highlighted that it referenced key legislation, making explicit what schools must have in place and actions they must undertake, such as anti-bullying policies, safeguard learners, and record and report incidents. Governors were seen as having clearly defined responsibilities to set strategic direction, monitor anti-bullying measures, and hold leaders accountable. These responses felt that the document leaves little doubt about the schools and governing bodies, with some noting that this gives them confidence to act within their legal duties.

‘Overall, the legal responsibilities of schools and governing bodies are clearly delineated. A headteacher or governor reading the guidance will understand their duty to provide a safe environment, to have an anti-bullying policy in place, to record and report bullying incidents, and to comply with all relevant laws. This clarity is vital. It empowers school leaders and governors to act decisively, knowing they have both the authority and obligation to do so. The guidance’s explicitness on legal points leaves little doubt about who is responsible for what, which should help drive consistent and effective action against bullying at the school level’

A quarter of responses (25%) made comments about issues of gender and biological sex. These repeat other themes throughout the document, and often do not relate to the question. As noted previously, we explore this theme more under question 5.

Around one in five comments (22%) stated that legal responsibilities are not clearly distinguished or presented. These include responses which felt the duties are not clearly distinguished, too dispersed, or buried within a long document. Concerns raised include:

- Legal responsibilities spread throughout a long document
- Length of the document may risk schools or governors missing key duties
- Calls for checklists, tables, or summary sheets to set out the distinct duties
- Unclear on who holds ultimate responsibility in some areas
- Clarity on where responsibility lies in the event of a legal challenge

21% of comments made more specific suggested improvements relating to duties. These included:

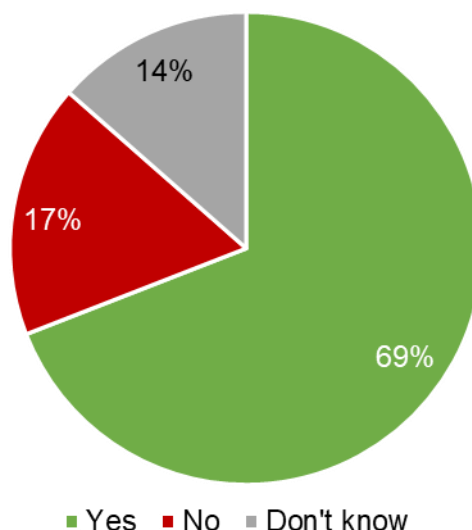
- Stronger emphasis on co-production with pupils, including those most at risk of bullying
- Clarifying consequences for non-compliance with legal duties
- Distinguishing statutory duties from good practice to avoid blurring requirements
- Ensure accurate definitions, particularly for ‘hate crime’
- Recommending schools monitor bullying linked to characteristics beyond the Equality Act’s protected characteristics (e.g. pupils on Free School Meals, young carers, care-experienced children, age of child bullied).

14% of responses focused on implementation of the guidance. This included concerns that schools often have policies in place but lack the capacity to follow them effectively, including suggestions that governors may struggle to meet any new responsibilities as part of their voluntary role. Extra responsibilities were sometimes also tied to concerns over the need for additional training.

‘The guidance clearly explains schools’ and governors’ legal responsibilities... That said, the level of responsibility placed on schools isn’t matched with any reference to funding or workload. For schools already managing stretched budgets and staff, the lack of practical financial support could make these duties harder to meet effectively.’

7% questioned the legality of the document in reference to the recent Supreme Court ruling and the Cass Review.

### 4.3 Question 3 – Does the Rights, respect, equality anti-bullying guidance clearly set out the responsibilities of the local authority?



**Base: 207 respondents**

69% of respondents said that the guidance clearly sets out the responsibilities of local authorities, whilst 17% said it does not, and 13% said they don't know.

Respondents were given the opportunity to elaborate on their answer. The responses have been coded into themes and are shown in the table below.

Code	Count	%
Guidance is clear	19	27%
LA responsibilities unclear, scattered, or lacking practical examples	18	25%
Specific examples which could be included are omitted	13	18%
Comments on sex vs. gender / transgender issues	13	18%
Unclear distinction between LA and school responsibilities	10	14%
LA role in data collection, reporting and monitoring	9	13%
Specific examples of legal duties have been omitted	7	10%
LA role in training and support for schools	6	8%
Funding/ capacity issues	5	7%
See previous response	3	4%
Other	2	3%

**Base: 74 respondents**

Around a quarter (27%) of responses said that the guidance is clear. This included comments that noted that local authorities have a role in monitoring bullying data, supporting schools with training and policy development, and stepping in when serious safeguarding concerns arise. There was also an appreciation that local authorities are expected to 'have regard' to it by law and that the guidance ties local authority responsibilities to oversight and accountability.

'In summary, the responsibilities of local authorities are clearly set out: LAs must take the guidance into account, monitor bullying data (especially prejudice-related

incidents), support schools in adopting effective anti-bullying strategies, and collaborate on consistent practices. This clarity ensures that anti bullying is not left solely to individual schools – there is a layer of oversight and support from the local authority level as well. Such clarity is very welcome. It means that if a school is struggling with bullying issues, the LA has a mandate to step in and help; similarly, it holds LAs accountable for the broader picture (trends across schools, training needs, etc.).’

A similar proportion (25%) had opposing views – that local authority responsibilities are unclear, scattered, or lacking in practical examples. Many of these were similar to comments from previous questions – that is, concerns that there is no clear section for local authorities to read about their duties, and a lack of clear examples or case studies to show how responsibilities should work in practice.

‘The guidance does not provide a dedicated section outlining the local authority’s role in detail. Responsibilities are scattered across the document, making it challenging for local authority officers to effectively and quickly identify their obligations.’

Around one in five (18%) made suggestions to improve the document. Some of these were around formatting, as per responses to previous sections, such as clearer breakdowns or checklists. Other more specific suggestions included:

- Guidance on what local authorities should do if schools follow the guidance but bullying persists
- Suggestion that local authorities should have their own anti-bullying policies dovetailed with schools
- Stronger guidance for local authorities on protecting learners most at risk of bullying

The same proportion (18%) made comments relating to sex and gender, replicating similar points made elsewhere in this report. Some argued that conflating sex and gender undermines recent legal rulings, leaving local authorities uncertain about safeguarding responsibilities such as single-sex provision. Others, by contrast, felt the guidance should require local authorities to support transgender and intersex learners and ensure protection against prejudice-based bullying.

‘Conflation of SEX with GENDER creates confusion and does not represent the LAW - the Equality Act is clear that sex is biological, any deviation from this will create problems for all concerned, i.e. pupils, staff, governors and the LEA. In particular the LEA is responsible for providing school buildings which are safe and supportive of learning for ALL children. Girls in particular need single sex toilet facilities. However the creep of 'gender-neutral' toilets is wrong and against the Education School Premises Regulations 1999’

‘The Local Authority should be required by statute to provide proper support to transgender and intersex children.’

14% of responses said that the draft guidance does not sufficiently distinguish between the statutory responsibilities of local authorities and those of schools. These respondents felt that references to local authorities can be vague or embedded within general statements such as ‘schools should work with their local authority’ without specifying what type of support should



be expected. Some felt that not clearly defining local authority responsibilities could mean that tasks or responsibility is pushed down onto schools.

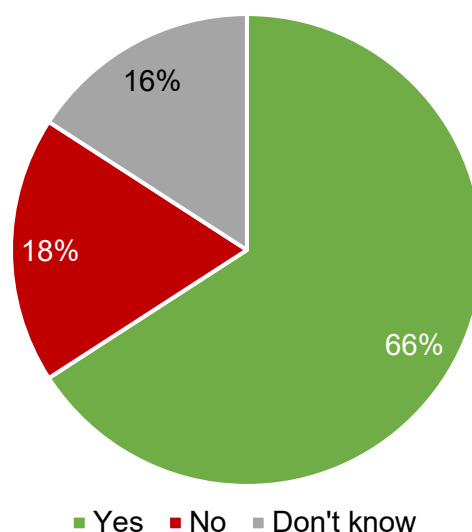
‘The responsibilities of the local authority are not clearly distinguished from the role of the school. This means that the responsibilities are not clear. Statements such as Schools should work with their local authority does not make it clear for example who in the local authority should be responsible for supporting or co-ordinating this and what type of support should be expected. There are no requirements set out on how local authorities should support schools.’

A similar proportion of responses (13%) made comments suggesting that the guidance lacks clarity on the local authority’s role in data collection, monitoring and reporting. There were calls for a nationally standardised reporting system to ensure consistency across Wales, while also enabling Welsh Government to track patterns. Others comments said that local authorities should go beyond gathering data to actively support schools in recording, analysing, and acting on trends.

‘A nationally standardised reporting procedure would reduce confusion and strengthen consistency across local authorities. This would also allow Welsh Government to monitor patterns or trends, respond appropriately and improve accountability at all levels.’

10% of responses felt that the guidance omits key duties for local authorities. Some of the duties that were mentioned by respondents include responsibilities under the Education (School Premises) Act 1999 (e.g. provision of single-sex toilets), the Education Act 2002 safeguarding duty, and the Equality Act 2010. Many of these participants felt that this leave legal obligations unclear in the guidance. 8% of responses said the guidance should more clearly require local authorities to provide training, support, and oversight to help schools implement anti-bullying policies consistently, whilst 7% of comments related to funding and capacity issues, echoing the same theme from previous questions.

#### 4.4 Question 4 – Does the Rights, respect equality anti-bullying guidance connect properly with broader policy areas and guidance on separate but related topics?



**Base: 208 respondents**

Two-third (66%) of respondents said that the guidance connects properly with broader policy areas and guidance, whilst 17% said it does not, and 13% said they don't know.

Respondents were given the opportunity to elaborate on their answer. The responses have been coded into themes and are shown in the table below.

Code	Count	%
Satisfied with links	17	27%
Cross-referencing with other policy/guidance is inconsistent or lacking	16	25%
Concerns about latest guidance on gender / definitions of gender / guidance is out of date	16	25%
Key topics missing or unclear (e.g. competing rights, GDPR, hate crime)	14	22%
Suggested restructure / additions / formatting changes	6	9%
Doesn't take into account time/resources/funding needed to implement	3	5%
Suggestion for related policy change to enhance guidance	2	3%
Unsure	4	6%
See previous response	3	4%
Other	8	13%

**Base: 67 respondents**

Around a quarter (27%) of responses said that the guidance connects with broader policy areas and guidance. Respondents highlighted strong links to safeguarding, equality, inclusion, the Curriculum for Wales (including RSE), and the Whole School Approach to emotional and

mental wellbeing. Several praised the attention to prejudice-based bullying and said the guidance aligns with the LGBTQ+ Action Plan and Anti-Racist Wales Action Plan.

‘The draft guidance demonstrates strong and deliberate integration with a wide range of broader Welsh Government policy areas, legislative frameworks, and guidance documents. These connections help ensure that schools’ approach anti-bullying work in a holistic, rights-based, inclusive and preventative manner, rather than treating bullying in isolation. The document actively promotes a systems-thinking approach, embedding bullying prevention within national frameworks for wellbeing, equality, inclusion, safeguarding, and curriculum reform.’

A quarter (25%) of responses felt that cross-referencing with other policy or guidance is inconsistent or lacking. The areas felt to be missing or lacking included:

- Keeping Learners Safe (2022)
- Equality Act 2010
- Public Sector Equality Duty
- Children Act.
- Links to Relationships and Sexuality Education (RSE)
- Welsh Government’s All-age Mental Health and Wellbeing Strategy.
- Nation of Sanctuary Plan
- Enhancing Digital Resilience in Education Action Plan
- Child Poverty Strategy

Some also felt the guidance can be confusing by not being consistent in how it aligns with existing policies, or by using unclear terminology.

- Sexual bullying vs sexual harassment – there was a feeling that terms are sometimes conflated, with these respondents feeling that this risks downplaying harassment as mere ‘bullying,’ and recommended alignment with the Sexual Harassment Action Plan.
- Curriculum references – some felt the guidance overreaches, setting expectations (e.g. embedding LGBTQ+ issues across the curriculum) that go beyond the remit of anti-bullying guidance and potentially conflict with Curriculum for Wales flexibility.

Once again, one of the most common themes was related to comments on gender. Some respondents welcomed the inclusion of references to different genders and links to the LGBTQ+ Action Plan, while others strongly criticised this approach, arguing it ignores or conflicts with recent legal rulings, leaving the guidance outdated or potentially unlawful.

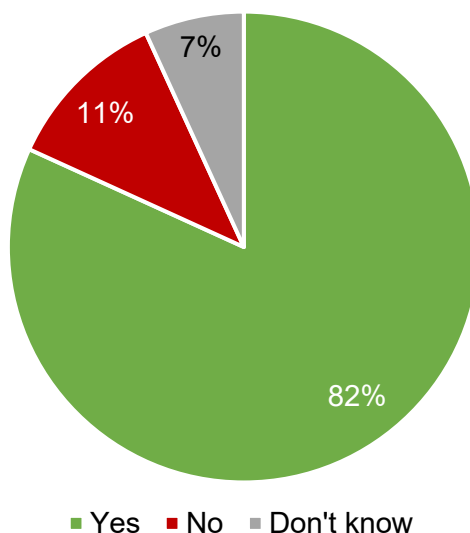
Around one in five (22%) responses felt that key topics are missing or unclear. These included:

- The relationship between poverty and bullying, including stronger links to the Child Poverty Strategy
- Risks around exploitation as a result of exclusions; clearer links to the 10-Year Child Sexual Abuse Strategy was suggested
- A feeling that the guidance falls short on a national racist incident reporting system
- Stronger alignment with the ALN Code and ALNET Act 2018

- Absence of National Minimum Standards for childcare noted, with a feeling that bullying can start in early years
- No link to the Strategic Education Workforce Plan (2025), despite relevance to staff training and capacity.
- More clarity requested on how to handle isolated incidents proactively.

Of the remaining themes, 9% called for formatting changes to make the report easier to digest; 5% felt the guidance does not consider the time needed to implement what is in the guidance. 3% or 2 respondents made suggestions to policy changes, including a ban on mobile phones in schools, and policies in place to ensure learners seeking sex reassignment are protected. 6% of comments said they were unsure what the question was asking.

## 4.5 Question 5 – Are learners with protected characteristics included?



**Base: 220 respondents**

Around four in five (82%) respondents felt that learners with protected characteristics are included, whilst around one in ten (11%) felt they are not, and 7% said they don't know.

Respondents were given the opportunity to elaborate on their answer. The responses have been coded into themes and are shown in the table below.

Code	Count	%
Specific area which is covered is helpful: Gender identity or expression / appreciate gender identity being covered as a PC	46	36%
Guidance is expansive / covers different discrimination / Equality Act	40	31%
Guidance is weaker in specific areas (religion, disability, neurodiversity, sex vs. gender identity)	21	16%
Concerns about differences/lack of convergence between Equality Act and this guidance (e.g. inclusion of gender identity as a protected characteristic)	17	13%
Guidance in balancing sex vs. gender identity is not enough in favour of sex	17	13%
Specific area which is covered is helpful: Other areas (various, e.g. Informing parents, intersectionality, tracking bullying by PC)	16	13%
Guidance in balancing sex vs. gender identity is not enough in favour of gender identity/not expansive enough	13	10%
Suggest guidance uses alternative terminology / create a consistency in terminology use	12	9%
Guidance doesn't take into account implementation	4	3%
Suggestion to make guidance clearer (inclusion of flow charts/visual summaries/case studies)	2	2%
Not sure how to answer/issue with the question	2	2%
Guidance has too much content/difficult to interpret	1	1%
Other	16	13%

**Base: 128 respondents**

Many responses to this question focused on sex and gender. The most common response (36%) related to comments which stated that they appreciated gender identity being covered as a protected characteristic, or the inclusion of gender identity and expression more broadly.

Many of these respondents felt this recognition was vital, stating there is growing political and social hostility towards trans and non-binary learners, and praised the Welsh Government for taking a clear and inclusive stance. These respondents said that trans and gender-diverse young people are particularly vulnerable to bullying and discrimination, and valued the guidance for and addressing this directly.

‘It is good that you have included gender identity and gender expression in the protected characteristics. It is refreshing to see a government body committed to helping and protecting these people’

‘Very important that gender expression has been included here, as that is a huge area of discrimination at the moment, and needs extra and explicit support for gender nonconforming youth’

Around a third (31%) of respondents said the guidance is broad and well-grounded in the Equality Act. They said that it clearly defines protected characteristics, and dedicates sections to prejudice-related bullying.

16% of responses felt that the guidance is weaker in particular areas. The areas highlighted included:

- Religion/belief & race/culture: A feeling that some sections lack depth on how prejudice manifests and how to respond.
- Disability & mental health: A feeling that more detail on bullying linked to disability and mental health is needed.
- Neurodiversity: A feeling that there is little reference to neurodivergence (e.g., autism, ADHD, Tourette’s).
- Sex vs. gender identity: Calls for legally precise definitions and guidance on balancing competing rights.
- Intersectionality & practical tools: A feeling that intersectionality is mentioned but not embedded.

13% of responses raised concerns that the draft guidance does not fully align with the Equality Act, particularly around the treatment of gender identity as a protected characteristic. Mirroring response to previous questions, responses under this theme

‘Equality Law protects categories of "sex". The conflation of ‘sex/gender/gender identity’ renders much of this guidance meaningless.’

Similarly, 13% of responses reflected a closely related theme: that the balance between sex and gender identity is skewed too far in favour of gender identity. These responses expressed concerns that sex-based discrimination may be misreported as gender-based, with some suggesting that sex is not being adequately recognised as a protected characteristic.

‘Seems to be odd Focus on gender identity (not even a protected characteristic ‘gender reassignment’ is) whilst barely mentioning misogyny & sexual harassment/abuse of women & girls, an actual epidemic in schools, resulting from the PC of ‘sex’, which isn’t allowed to be recorded as a hate crime.’

13% of responses identified specific elements of the guidance that they found helpful. These included:

- Bullying towards people who are disabled
- Advising caution in sharing information regarding LGBTQ+ learners with parents
- Rights-based framing, invoking the United Nations Convention on the Rights of the Child (UNCRC)
- Specific reference to migrants and refugees
- References to intersectionality
- Wide range of references to prejudice related bullying

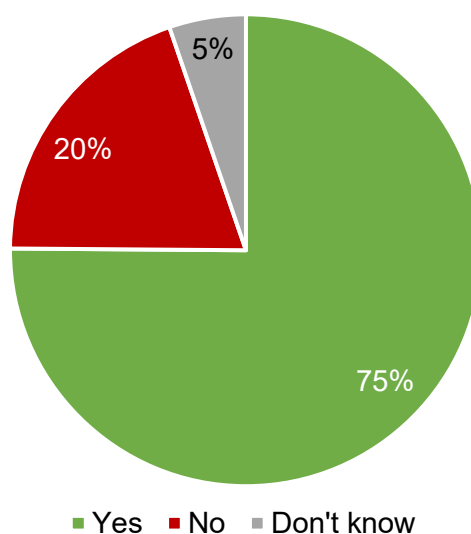
In contrast to an earlier theme, 10% of responses felt that the guidance does not sufficiently balance sex and gender identity, leaning too far in favour of gender identity. As a result, respondents expressed concerns that without more robust guidance in this area, there is a risk of bullying based on gender identity and insufficient protection for trans children.

‘You seem to want to avoid mentioning that transgender is a protected characteristic, under several specific pieces of legislation.’

9% of responses made comments relating to terminology, mostly suggesting that alternative terminology is used. This includes:

- Avoiding using the term ‘questioning their gender’ (with a feeling that this is vague)
- Clarifying language such as ‘questioning their gender sexuality’, with consideration given to children who are not ‘questioning’ but rather who identify as non-binary or gender non-conforming
- A feeling that ‘sexual orientation’ in parts of the guidance instead of ‘sexuality’
- Clarifying ‘sex’ and ‘gender’, and ‘gender reassignment’ and then used consistently throughout

#### 4.6 Question 6 – Is the Rights, respect, equality anti-bullying guidance explained clearly?



**Base: 209 respondents**

Three quarters (75%) of respondents said that the guidance is explained clearly, whilst one in five (20%) disagreed, and 5% said they don't know.

Respondents were given the opportunity to elaborate on their answer. The responses have been coded into themes and are shown in the table below.

Code	Count	%
Improve clarity around terminology	31	43%
Guidance is too long and difficult to navigate	30	42%
Include more practical examples and case studies	15	21%
Strengthen implementation guidance and training support	13	18%
General praise for the guidance	10	14%
Comprehensive coverage of protected characteristics	7	10%
Provide statutory requirements for data collection/reporting	5	7%
Strong protections for LGBTQ+ students	5	7%
Ensure alignment with legal rulings and evidence (Cass Review / Supreme Court	4	6%
Sex and Gender Identity Balance	3	4%
Other	3	4%

**Base: 72 respondents**

Of those that chose to provide an open comment, 43% of these called for greater clarity around terminology. Many of these comments repeated earlier themes, around clarity and distinguishing between sex and gender, whilst also clarifying 'gender identity'. Other suggestions include:

- Including transgender parents in Section 3.29
- Avoid using the term 'bully' (e.g., in paragraphs 2.20 and 9.6). Consistently use 'children displaying bullying behaviours' or 'children who are bullying'



- Include 'power imbalance' in the definition of bullying
- Add a definition of harassment, as the term is used frequently.

42% commented to say that the guidance is too long, or difficult to navigate. There were calls for a more accessible report, with clearer structure and flow, easier navigation, as well as calls for a shorter, more concise document.

'The document is clear, but very long. Detail is needed but there is a significant gap between the full document and the 'easy read' version. A summary guide may be useful in addition.'

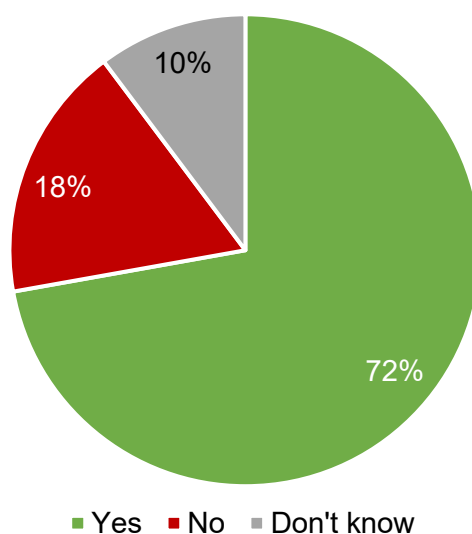
'The full draft is quite overwhelming in terms of the amount of information. However, the easy to read version too simplistic and does not provide sufficient information in relation to the guidance. It would be better for Secondary schools to have a middle-ground, where the information is sufficient but not necessarily overwhelming.'

21% called for greater practical examples, case studies or actionable steps that schools can take to enact the guidance.

18% called for stronger implementation guidance and training support. This included staff training on LGBTQ+ issues. This theme often overlapped with the previous theme, with calls for help in understanding how to implement some of the guidance.

'While as a resource it provides a comprehensive overview of bullying, including clarity through a dedicated responsibilities section, outlining schools, governors and local authorities responsibilities, examples of good practice, practical tools (such as reporting proformas, audit templates etc.), and a section that clearly outlines what pupils and families should expect as a minimum when an incident of bullying is reported, would support more effective implementation.'

#### 4.7 Question 7 – Is the Rights, respect, equality anti-bullying guidance user-friendly?



**Base: 205 respondents**

Around three quarters (72%) of respondents said that the guidance is user-friendly, whilst around one in five (18%) said it was not, and 10% said they don't know.

Respondents were given the opportunity to elaborate on their answer. The responses have been coded into themes and are shown in the table below.

Code	Count	%
Document is user friendly / accessible / easy to use / fit for purpose	27	35%
Report too long / detailed / complex to be user-friendly	26	33%
Improve clarity around terminology and legal precision	21	27%
Clear structure	18	23%
Suggest creating a shorter / quick reference guide for day-to-day use	18	23%
Suggest presenting the information in different mediums (video, print/digital, large font, accessible formats)	17	22%
Improve structure / organisation for navigation	17	22%
Suggest creating guides for different audiences (e.g. children and parents)	15	19%
Include more practical tools and case studies	14	18%
Appreciate availability of Easy Read and multiple versions	7	9%
Appreciate provision of supporting resources and references	2	3%
Unaware of easy read version	2	3%
See previous response	2	3%
Other	7	9%

**Base: 80 respondents**

Of those that chose to provide an open comment, 35% made supportive statements, noting that the guidance is user friendly, accessible, easy to use, and fit for purpose.

'The document is clear and, for experienced practitioners, will provide support in developing anti-bullying strategy, policy and practice.'

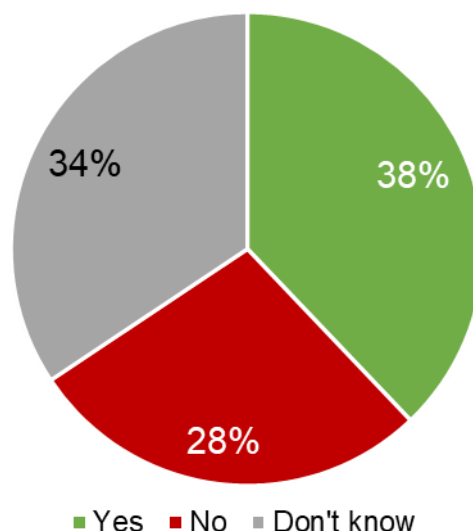
A similar proportion (33%) of responses said that the report is either too long, too detailed for practitioners or other education professionals to digest, or complex. As a result, these respondents did not feel that the document is user-friendly.

'It's just a lot of information, and for people working in these situations there is already a lot of documentation already to go through just to do the regular "9 - 5" of teaching, supporting, managing, operating in these environments.'

27% of responses called for greater clarity over terminology, particularly where legal judgements have been made, with the vast majority of these responses echoing previous concerns that the guidance will need to be amended in light of recent legal rulings. Other comments on terminology include there being too many descriptors or overcomplicating bullying, and a dislike for using the word 'target' for a young person being bullied, feeling that this is equally problematic as the word 'victim'.

A similar proportion (23%) specifically said that the guidance has a clear structure. This overlaps with the most common theme, although some of the responses to this theme included respondents who felt there was a clear structure, but had concerns about other elements of its user-friendliness, and as such, could not be coded under the most common theme for this response.

**4.8 Question 8 – Should other areas which you have not had an opportunity to comment on above be included in the Rights, respect, equality anti-bullying guidance? If yes, please provide details.**



**Base: 198 respondents**

38% of respondents said that other areas which they have not had an opportunity to comment on should be included in the guidance, whilst 34% said no, and 28% said they don't know.

Overall, responses either flagged particular forms of bullying which they felt needed greater coverage in the guidance, or made suggestions around areas relating to the implementation of the guidance.

Code – Forms of Bullying	Count	%
LGBTQ+ bullying (including bullying of trans / nonbinary learners)	8	10%
ALN bullying	6	7%
Online / digital bullying (including new threats from AI)	6	7%
Sexist / sex-based bullying / misogyny	6	7%
Bullying which is not learner-to-learner	5	6%
Bullying based on poverty / socio-economic background	3	4%
Bullying based on disability	2	2%
Bullying based on language use	2	2%

**Base: 78 respondents**

Concerns about bullying of LGBTQ+ learners often made reference to growing hostility towards the LGBTQ+ community and trans individuals in particular, and anxiety caused by the recent Supreme Court ruling (10%).

Respondents were concerned that it is particularly difficult to distinguish whether or not learners were being targeted due to their additional learning needs. Some also emphasised neurodiversity as distinct from other learning needs; wanting practical strategies to identify and respond to bullying when, for example, a learner has a communication difference (7%).

In terms of online bullying, respondents were concerned with the potential growth in cyberbullying, including through AI generated pornography ('deepfakes'), photo manipulation or misinformation. These comments aligned with responses relating to sexist or misogynistic bullying. There were additional concerns that sexist or misogynistic bullying would be recorded as 'gender based' bullying but without specifying that this was bullying of girls by boys (7%).

Some wanted additional content on bullying which is not learner-to-learner. This included how to deal with witnessing parent-child bullying, bullying which occurs outside of the school, and bullying of or by school staff (6%).

Finally, a small number of respondents felt that there could be greater coverage of bullying based on poverty or socioeconomic background, including links to training around stigma (4%). Bullying based on disability was also mentioned, with individual respondents suggesting learners should be made aware of disabled people's rights, and that schools implementing the guidance should engage with disabled pupils due to their increased likelihood of being bullied (2%). Bullying based on language use was mentioned by 2% of respondents, acknowledging its interconnection with cultural diversity, immigration, linguistic prejudice and stigma.

<b>Code - Implementation</b>	<b>Count</b>	<b>%</b>
Take a more proactive approach	9	11%
Produce / link to practical resources	8	10%
Concern about effect to free speech / being able to express gender critical beliefs	7	9%
Guidance is good in its current form / nothing needs adding	6	7%
Produce a quick reference / summary guide version for school staff	6	7%
Guidance lacks intersectional viewpoint	5	6%
Increase content on managing the transition from primary to secondary	5	6%
Parental inclusion / communication necessary	5	6%
Increase content on managing safeguarding processes	4	5%
Concern about influence by groups who want to gender critical beliefs excluded from bullying guidance	4	5%
Suggest change in terminology ('perpetrator')	4	5%
Dealing with isolated / one-off incidents	3	4%
Consider mental health to a greater extent	2	2%
Consider the role of school absence in recording and recognising when a child is being bullied	2	2%
Other	31	40%

**Base: 78 respondents**

While a number commented that they felt the guidance needed no changes in its current form (7%), a number of suggestions arose relating to the implementation of the guidance.

The most common response suggested that the guidance should seek to promote a more proactive approach (11%), for example in fostering a positive/inclusive/ accepting environment in school. Some stated that the guidance is too reactive to bullying after it has occurred, rather than preventing it occurring in the first place.

'Although the draft Rights, Respect, Equality guidance provides a comprehensive framework for responding to bullying incidents, it is largely reactive in nature and does not go far enough in preventing bullying before it occurs. The guidance focuses

heavily on how schools should respond once incidents happen, including definitions, recording procedures, and restorative approaches. However, it lacks a structured prevention model and does not provide schools with proactive tools such as early intervention strategies, school 'climate' assessments, or curriculum-linked anti-bullying education. There is also no requirement for preventative staff training or pupil-led initiatives to build inclusive school cultures. To be truly effective, the guidance should place greater emphasis on proactive measures that foster respectful environments and reduce the likelihood of bullying occurring in the first place.'

It was felt that the current guidance is too detailed in its entirety to be practically useful. There were calls both to produce and link to practical resources to aid with implementation (10%), and to produce a quick reference or summary guide version for school staff to support day-to-day use (7%). Commonly suggested practical resources included training videos and templates for recording, responding to, and reviewing incidents.

'I also feel that more information could be given in the 'intervention' section, even if in links to further reading/guidance. Just describing the types of intervention (e.g. the two sentences on mediation) would be more useful with tips on how to do this effectively (what should be established/discussed with pupils in such meetings, or interventions/resources that could help guide this).'

9% of responses were concerned with the guidance impacting on the freedom to express viewpoints which could be perceived as bullying. For the most part, this pertained to protecting the ability to voice opinions which are gender critical.

'There is no mention of belief protections under the Equality Act 2010. Pupils and staff who hold gender-critical views (which are protected beliefs under UK law) must not be discriminated against or labelled as "prejudiced." The omission risks chilling effect and compelled speech, especially in areas such as pronoun use and curriculum discussion.'

'Maya Forstater ruling protects speech and allows people to voice their opinion over gender identity ideology.'

Conversely, 5% of respondents expressed concern that the consultation might be influenced by gender critical beliefs to essentially permit bullying through protecting gender critical beliefs.

'[...]much more needs to be done in schools to emphasise that whilst people have a right to belief that does not entitle anyone to make someone with a protected characteristic so uncomfortable that it impedes their learning potential[.] School is about teaching, it is not a church, it is not a gender critical meeting hub, it is not a political debate[,] it is a school.'

Some specific areas that respondents felt should be included within the guidance received a similar number of comments. The first of these was increasing intersectionality within the guidance, i.e., providing clarity on how to approach bullying involving multiple protected characteristics (6%).

'The document would benefit from clearer advice on how schools can support learners who face bullying based on more than one protected characteristic. For example, a Black trans pupil may experience different forms of bullying

simultaneously, and staff need support in recognising and addressing this complexity.'

'What's Missing: Limited discussion of how gender norms and race intersect with bullying, particularly affecting boys of ethnic minority backgrounds. Suggested Addition: A deeper dive into intersectional equity approaches to support healthy identity development and challenge biases.'

The same proportion highlighted that periods of transition in school, leave learners more vulnerable and at risk of bullying (6%). In particular, the transition from primary to secondary school was seen as being a pivotal time to promote vigilance in looking for signs of bullying.

'Guidance on transitions and less structured environments: Bullying risk increases during key transition points, like moving from primary to secondary school, and in less supervised times such as transport, break times, and trips. Including guidance on assessing and managing these risks helps schools take a proactive rather than reactive approach, reducing harm before it occurs.'

Others wanted to increase the role of parents in bullying prevention and intervention or suggested increasing communication about bullying between parents and schools (6%).

'Strengthened engagement with parents and carers: Parents and carers play a key role in preventing and addressing bullying. Clear expectations for involving them in policy development, raising concerns, and ensuring transparent processes will support a consistent whole-school, whole-community approach.'

A similar proportion wanted increased content on managing safeguarding processes (5%).

'2.35 outlines that some instances of bullying may involve safeguarding processes and/or the police, but there is no guidance provided as to when these processes should be incited. This is also the case with point 2.37 and 'a one-off hate crime' and involving the police 'if considered necessary'. There needs to be clearer guidance in relation to when to involve the police and clear assurances given to pupils and families that a zero-tolerance approach is taken with regards to hate crimes and incidents.'

Additionally, some respondents suggested changing terminology around the use of the word 'perpetrator' to avoid criminal implications (5%).

'The term "perpetrator" has caused issues for educators with many telling the charity that they are put off from recording incidents because of the criminal implications of this language. This should instead be replaced with people-focused language e.g. child who perpetuates harm.'

Small numbers of comments suggested the guidance gives more direction on handling one-off incidents, noting that these do not currently fit into the definition of bullying but should be considered and can lead to repeat incidents (4%). Others wanted a greater emphasis in recording school absences as a potential indicator of bullying to provide an opportunity to detect and implement support (2%).

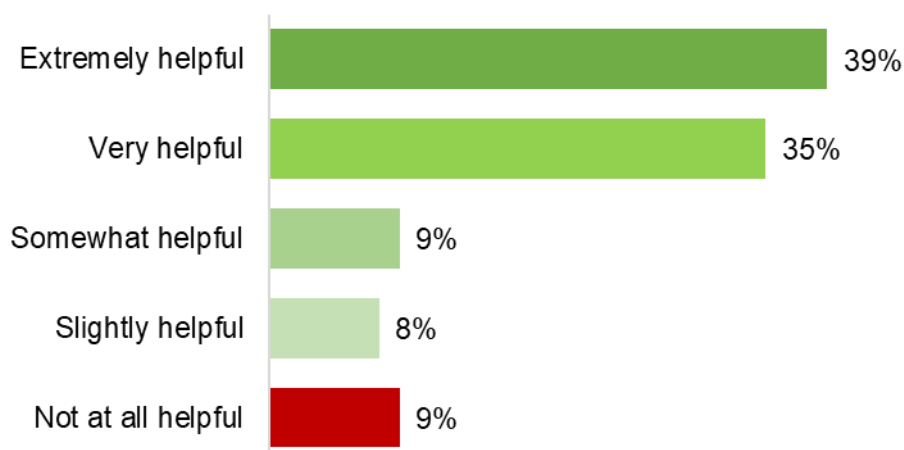
Unique responses highlighted that the guidance should:

- Consider the role of bystanders in bullying

- Suggested advocating for a restorative approach
- Wanted clarification that learners that have been bullied should not be pressured to forgive bullies
- Clarify the source of statistics used in the guidance



#### 4.9 Question 9 – How helpful do you find the Rights, respect, equality anti-bullying guidance?



**Base: 188 respondents**

When it came to how helpful respondents found the guidance, around two fifths (39%) found it extremely helpful, while around a third (35%) found it very helpful. However, 9% and 8% respectively found the guidance only somewhat or slightly helpful, while 9% found the guidance not at all helpful.

Code	Count	%
Guidance is generally helpful / good / positive	19	29%
Guidance requires more (or links to more) practical advice / training / resources / examples of good models to follow	19	29%
Guidance is in conflict with / does not make sufficient reference or adhere to the Supreme Court ruling / Equality Act / does not sufficiently distinguish between sex and gender	12	18%
Guidance contains too much detail / needs to be made more accessible	11	17%
Guidance needs to include more references to specific themes or topic areas (e.g. intersectionality, neurodiversity, desensitisation, digital bullying, power dynamics)	6	9%
Create resources aimed at parents / learners (in addition to the easy-read) / involve them in tackling bullying	6	9%
Data collection needs to be consistent / mandatory / effectively monitored	5	8%
Guidance risks being ideologically driven / being influenced by pressure groups	4	6%
Guidance needs to include more references to groups likely to be subject to bullying e.g. trans children, young carers, gypsies and travellers	3	5%
Consider multi-lingual versions of guidance	3	5%
Concerns with the approach to protected characteristics	3	5%
Guidance on toilets needs to be changed	2	3%
Guidance needs to align with other frameworks / be able to be embedded in other frameworks and guidance	1	2%
See previous	5	8%
Other	16	25%

**Base: 65 respondents**

Some of the most common responses simply highlighted the ways in which the guidance would be helpful to them, or stated that they found the guidance helpful with no further comment.

‘The guidance offers a strong foundation for tackling bullying, especially in how it addresses prejudice, links to current policy, and promotes a whole-school approach. It’s clear, thorough, and rooted in real issues facing learners in Wales today.’

Nevertheless, these comments were often qualified with suggestions for how the guidance could be made more helpful. Most commonly, respondents called for more practical advice, training and resources, as well as examples of effective practice to follow. These comments were often related to concerns that teaching staff would not have enough time to digest the guidance in full. 17% of respondents felt that the guidance contains too much detail, suggesting it is too long to interpret easily, and would benefit from simplification and being made more accessible. Some gave examples of what parts of the guidance could be reduced or removed.

‘Although this guidance is helpful, raises many important issues and covers different types of bullying, the document is too text heavy (as referenced in Q6). As mentioned previously, those working in education do not have the time to navigate their way through unclear information.’

‘We would suggest that the document would be more helpful if the confusing advice on curriculum that cuts across other guidance is removed. [...] Over lengthy explanations detract from sections the more focussed areas which actually deal with practicalities for dealing with bullying. Hyperlinks could be substituted to give access to additional information. [...] Focus on the practical elements to address bullying rather than dip into ideology or theory.’

Some also suggested establishing more clearly the role of parents and learners in tackling bullying, and creating resources or simplified versions of the guidance to better engage with those audiences (9%).

‘The easy read guidance is clear for young people (although it feels very young) or people with literacy difficulties. I think it is worth having a similar approach to the original RRE guidance which included a document for children, for young people, for parents and the full guidance. This meant that schools could direct pupils or parents to appropriate information, particularly where levels of literacy means that the school knows certain people may not be able to access the information relevant to them.’

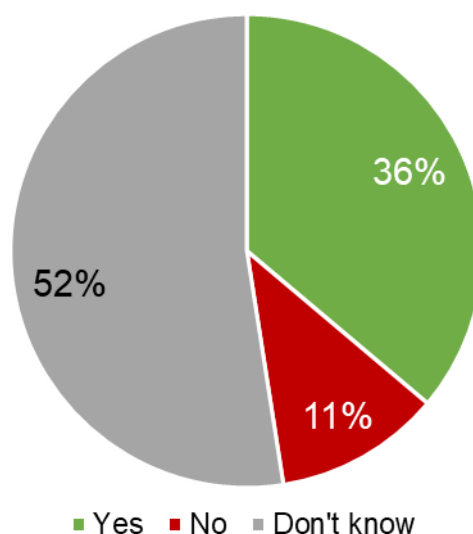
However, conflictingly, some felt that there were certain additional topic areas which would benefit from being covered by the guidance (9%). These included intersectionality, neurodiversity, the risk that learners and teachers can become desensitised to bullying behaviour, digital bullying, and power dynamics between adults and children.

As occurred elsewhere, and particularly in responses to question 12, there were a number of comments about the influence of pressure groups or those with ideological objectives (6%). This was particularly linked to concerns about the proposed change relating to gender neutral toilets (3%).

Some comments (3%) focussed on the guidance’s approach to protected characteristics, with some feeling that protected characteristics took too great a prominence in the guidance. They highlighted that bullying can often be due to other factors than prejudice and discrimination,

with one commenting about a lack of guidance on navigating conflicts between different protected characteristics.

#### 4.10 Question 10 – Does the current suite of training on Hwb support the use of the Rights, respect, equality anti-bullying guidance?



**Base: 202 respondents**

Around two thirds (36%) of respondents felt the current suite of training on Hwb supports the use of the guidance. 11% disagree, while more than half (52%) feel that they don't know. As Hwb is Wales's national digital platform for learning and teaching, it is likely that some of the proportion of 'don't know' responses come from those that aren't practitioners involved in education and who don't have familiarity with Hwb.

When excluding the 'don't know' category, around three quarters feel the current suite of training supports the guidance (76%), while 24% do not, from a base of 96 respondents.

Code	Count	%
Specific topic areas need additional training / resources (other than LGBTQ+ / trans bullying)	15	35%
Specific resources or training should be uploaded to Hwb to support implementation	10	23%
Resources will need to be kept up to date / updating on Hwb regularly / some resources out of date	9	21%
Resources on Hwb are generally good / Hwb easy to navigate / I found what I needed	7	16%
Hwb poor / not fit for purpose / not used / difficult to navigate	6	14%
Dealing with LGBTQ+ (and particularly trans) bullying needs additional training / resources	5	12%
Concerns about law / legal obligations are not clear or prominent enough	5	12%
Hwb resources currently very focussed on online bullying	4	9%
Comment about gender ideology/toilets/de-transitioning/Supreme Court ruling	4	9%
Concerns about the suitability for different audiences	3	7%
Some of the resources are not working currently	3	7%
Concerns about consistency	2	5%

Concerns about capacity to use the resources on there / can't rely on Hwb for training	1	2%
Issue with terminology	1	2%
Other	9	4%

**Base: 43 respondents**

Responses tended either to list:

- Topic areas which need greater resources and training (35%), or
- Types of resources which would be useful (23%)

Topic areas included, in order of frequency:

- Prejudice-related bullying / hate crimes
- Safeguarding
- Neurodiversity
- Potential harms of pornography (e.g. sexting and use of mobiles, nude photos, rough sex, normalisation of strangulation)
- Fostering a respectful / inclusive school culture
- Trauma informed practice
- Effective family engagement
- De-escalation
- Restorative approaches
- Relationships and sex education
- Intersectionality
- Welsh language
- Support for staff impacted by incidents

Some contextualised their responses by stating that they felt the current suite of training was largely focussed on online bullying (9%).

However, most frequently, respondents requested more resources and training on the topic of LGBTQ+ bullying (12%). This commonly included requests for techniques to recognise and deal with homophobic/biphobic bullying as well as trans bullying in particular, with some respondents reporting a lack of familiarity or confidence in this area amongst teachers.

The same proportion (12%) were concerned about ensuring teachers were suitably trained and confident in their understanding of the law, particularly in relation to the Equality Act. This included understanding:

- what constitutes protected characteristics
- how to balance the rights of conflicting protected characteristics
- what rights individuals have to express gender-critical views
- the implications of the Supreme Court ruling and Cass review

These often overlapped with comments about gender ideology and gender neutral toilets (9%), which repeat the themes expressed in more detail in question 12.

In addition to topic areas, frequent suggestions included types of training or resources which respondents felt would be useful if provided (23%). These included the following:

- On-demand professional learning modules (including on the guidance)
- Scenario-based training videos
- Templates for policies, action plans, and incident recording
- Short guides for parents and governors
- Case studies
- Legal risk analysis
- Resources designed for religious schools
- Downloadable training sessions
- NSPCC's Talk Relationships service
- More detailed, setting-specific implementation tools (e.g. for EOTAS, PRUs)

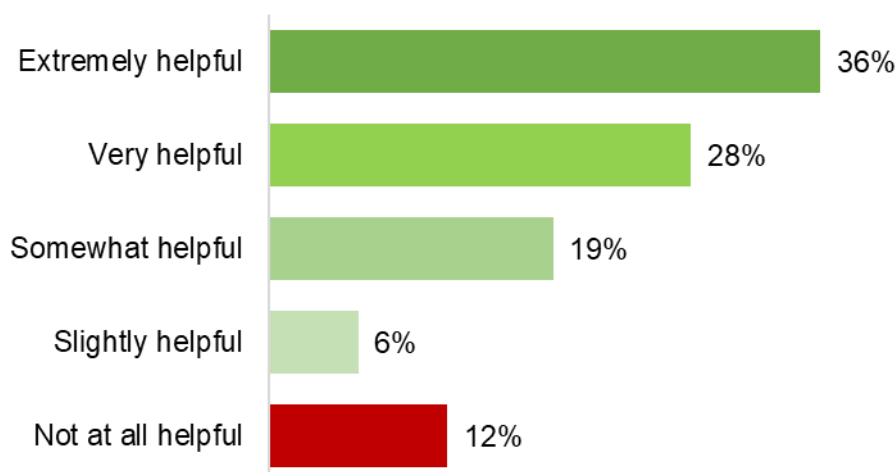
Some respondents also emphasised that any additional resources uploaded to Hwb would need to be updated regularly to align with the latest research on effective practice (21%).

Notably, a small number reported that hyperlinks on Hwb were not working correctly (7%), and requested that these be updated prior to the guidance's launch. However, these links were not specified.

'The resources at the end of the document are very useful in signposting schools to appropriate organisations for help and support. However, some of the playlists/links are not working and need to be looked at'

16% praised the current suite of training on Hwb, while 14% gave negative feedback. Those who made positive comments found Hwb easy to navigate to access what they needed. However, opposing comments felt Hwb was difficult to navigate or use, that resources were poorly signposted, and questioned the extent to which teaching staff actually used the portal to receive training.

#### 4.11 Question 11 – How helpful is the Rights, respect, equality anti-bullying guidance in supporting you to report and record incidents of bullying?



**Base: 188 respondents**

Overall, 36% of respondents said they found the guidance extremely helpful in supporting them to report and record incidents of bullying, while more than a quarter found it very helpful. However, 19% said they found the guidance only somewhat helpful in this respect, with 6% finding the guidance slightly helpful, and 12% finding it not at all helpful.

Code	Count	%
Not enough guidance on what data / information schools should collect / collection should be consistent and not up to schools	19	32%
Generally agree the guidance on reporting / recording incidents is helpful or clear / provides good examples	15	25%
Include more examples in guidance	10	17%
Guidance doesn't sufficiently consider increased workload / the burden of implementation	7	12%
Needs greater emphasis on follow up or next steps from recording / what to do with the data / how to support the person who was bullied	6	10%
Concerns schools won't record / take it seriously	5	8%
Guidance isn't clear/needs greater detail	4	7%
Needs simplified version for communication / need to think about how this is communicated e.g. to pupils and parents	4	7%
Other concerns about accuracy of recording	4	7%
Need clarity on thresholds (e.g. for reporting/escalation)	4	7%
Issues with clarity between sex and gender / concerns sex-based discrimination and gender identity bullying incidents will be confused in recording	3	5%
Should record additional information about bullying incidents (e.g. nature of bullying, location etc.)	3	5%
Suggest terminology change (e.g. wording 'should have' should be 'must')	3	5%
Don't know / not sure	1	2%
Other	25	42%

**Base: 60 respondents**

When it came to how helpful the guidance is in recording incidents, key feedback focussed on the recording process. Most commonly, respondents felt that the way in which incidents are recorded should be standardised, either by the local authority or at a national level by Welsh Government (32%). These responses highlighted a risk that, while incidents may be rigorously recorded, there would be no consistent way to gather regional or national level insights from the data. As a result, these respondents felt strongly that record keeping should not be up to schools, but that a recording template should be provided.

‘It may be worth exploring the possibility of establishing a national or local digital platform for recording bullying incidents (adapt through Hwb/G6 for example), with suitable data fields and automatic exports to local authority dashboards. It may be beneficial for the Welsh Government set clear national key performance indicators and commit to a formal review after two years (summer 2027) to measure uptake and impact—for example the proportion of schools using the template, reductions in repeat incidents and improvements in learner “feeling safe” survey scores.’

Linked to this theme were comments which expressed that implementation hadn’t been fully considered (12%), including a lack of consideration that all schools might not have the resources to create forms to record incidents, implement new processes or analyse the data from records. Consequently, there were calls for more examples in the guidance, illustrating what data and information should be in scope for collection, and to navigate reporting and recording complex situations (17%).

‘Crucially, there’s no recognition that increased expectations around reporting will create extra workload—especially for already stretched staff. Without additional staffing or admin support, schools (especially smaller schools) may struggle to meet these expectations consistently. Practical tools and acknowledgment of the resource impact are needed to make this part of the guidance fully workable.’

‘[...]examples of how to log episodes of bullying given the repeated nature of bullying and the overlap between single discriminatory incidents which might not be bullying but which need to be recorded. The example on hwb is a start and it is shame this was not included on the guidance document.’

Some suggested thresholds for escalation would be a crucial element (7%). For example, when behaviour becomes bullying, or when a safeguarding concern should be escalated to police involvement. Others suggested that other useful information relating to incidents should be logged for monitoring purposes, including location and the nature of the bullying (5%).

‘Provide a threshold guide: When does a concern become bullying? Suggest categories for tracking (type, location, frequency, target group)’

‘[...]in addition to categorising and recording both the type of bullying and characteristics of pupils engaged in bullying and/or are victimised, schools need to have structures for reporting the nature of bullying incidents.

Clarification of thresholds for escalation and links to safeguarding pathways. Guidance on how to capture patterns of behaviour (e.g. repeated, low-level incidents).’

Without these features, there was concern amongst a number of respondents that schools would not record incidents effectively, or would not treat this part of the guidance with the seriousness it deserved (8%). Others felt that there would be issues with accuracy in recording,

including a potential for harmful or malicious use which had not been accounted for in the guidance (7%). This included some concerns that sexist or sex-based bullying might be recorded as gender-based or homophobic (5%).

'[...] in order for students to feel confident and safe enough to share when they have experienced bullying, schools need to "believe reports from pupils at first instance". If schools struggle to do this well, then young people may not have enough trust or belief in the school to report incidents in the first place. This is a concern, as suggested in the guidance, that a school that reports no bullying most likely does have bullying in the school but is unaware of taking place.'

'There are no protocols to prevent malicious or ideologically motivated accusations, especially in cases involving philosophical belief (e.g. gender-critical views).'

'Bullying behaviour which is sexist, for example harassment of a child who is deemed to be 'too butch' to be a girl is based on sexist stereotypes. The guidance muddies the water in this respect. For the girl experiencing the bullying the important thing is for it to stop. Recording such incidents as 'homophobia' or 'gender-based' allows sexism in schools to persist. It also gives the impression that the bully's insults are correct. Such behaviour needs to be addressed effectively and often the labelling of people, as well as behaviour, that guidance such as this encourages makes that much harder.'

As was raised throughout the consultation responses, a number wanted content to be produced to communicate to different audiences, such as to explain to pupils and parents the process and purpose of the data collection (7%).

'For parents and learners, the easy read document says that schools need to record incidents. It would be helpful if the easy read document explained what this recorded information should be used for, i.e. to help schools improve approaches to preventing and responding to bullying. This may help parents and learners understand why reporting incidents and expecting them to be recorded is important for improving and/or sustaining good relationships and community cohesion.'

'I think it will be very useful for teachers - but again, should be distilled for easy consumption and posting in staff rooms'

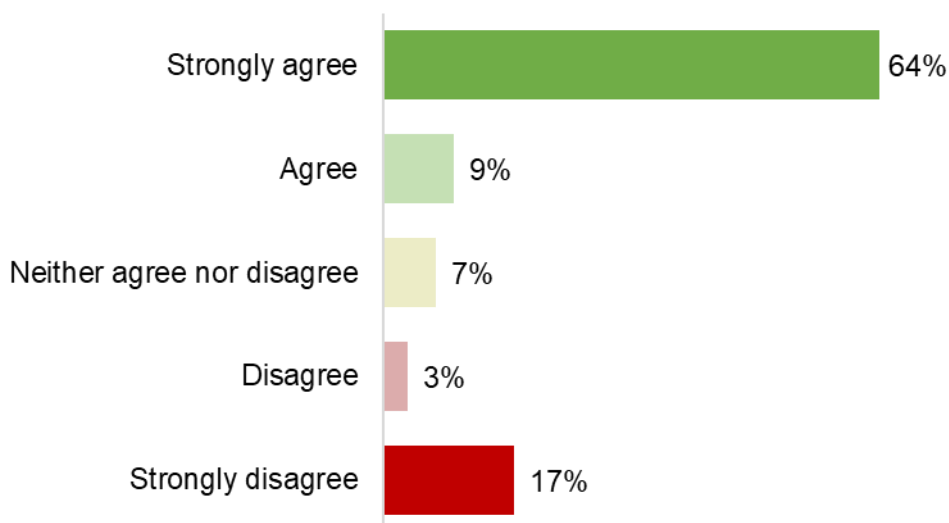
Finally, two comments (5%) suggested terminology changes:

'Current wording says - It is important that learners, their families, schools and education settings are not discouraged from reporting racism – would prefer wording that insists learners, families, schools and education settings should be encouraged to report racism.'

'[...]when it comes to recording incidents, the definition of this should be changed from 'should have' to "must".'



#### 4.12 Question 12 – To what extent do you agree that the Education (School Premises) Regulations 1999 should be amended to make clear that schools may provide gender-neutral toilets in addition to sex-separated toilets?



**Base: 220 respondents**

Overall, around three quarters of respondents agreed that the Education Regulations 1999 should be amended, while a fifth (20%) disagreed. Views tended to be polarised, with 64% strongly agreeing, and 17% strongly disagreeing.

Code	Count	%
Provision of gender neutral toilets in addition to single sex toilets is beneficial to trans/non-cisgender students	37	23%
Single occupancy toilets / private stalls with sinks are a better solution for all	33	20%
Provision of gender neutral toilets has benefits beyond gender identity	29	18%
Concerns trans children will be excluded from certain toilet use / 'outed'	24	15%
Schools should encourage a choice in toilet type / children should have choice	17	10%
Provision of sex-separated toilets is beneficial for safeguarding / privacy / meeting needs of girls / cultural or religious groups	15	9%
All toilets should be gender neutral	14	9%
Schools need freedom / flexibility to implement according to their circumstances	13	8%
Gender neutral toilet provision is unnecessary / driven by ideology rather than need / are less safe	13	8%
Implementation will require funding / there is cost or added workload associated with this change	12	7%
Otherwise support changes to regulations / guidance is inclusive (non-specific)	11	7%
Provision of gender neutral toilets should be clarified as optional and in addition to sex separated toilet provision	11	7%
Gender neutral toilet provision should be mandatory / wording should be changed from 'may' to 'should'	9	6%

Gender neutral toilets are otherwise good / a good idea	8	5%
Provision of sex-separated toilets is a legal requirement / legal requirements should be clearer in the guidance	6	4%
Inadequate consultation undertaken to justify the changes to regulations / insufficient evidence-base put forward	6	4%
Trans children are particularly vulnerable to toilet based bullying and discrimination / need particular coverage in guidance	6	4%
Guidance on implementation is needed / concerns that implementation will be poor	3	2%
Issue with terminology used in guidance (other than 'may' vs 'should')	2	1%
Guidance is generally not clear enough	2	1%
Other	31	19%

**Base: 162 respondents**

Amongst the most common responses were those which put forward that gender neutral toilets in addition to sex separated toilets would be particularly beneficial to trans and gender non-conforming learners (23%). These comments sometimes highlighted trans children as being particularly vulnerable to bullying, and therefore requiring particular accommodation by schools to reduce bullying potential (4%).

‘When schools and other educational settings make adequate and sensitive arrangements for toilets which take into account the needs of all children, including those who are transgender, non-binary or questioning their gender identity, this will help ensure trans learners to feel safe and comfortable using toilets in school.’

‘Providing gender-neutral toilets is a practical and compassionate solution to a well-documented problem. Currently, many transgender students feel unsafe or uncomfortable using toilets that align with the sex they were assigned at birth. In fact, studies have found that a significant majority of trans pupils avoid or are prevented from using school toilets that match their identity, three in five trans pupils (58%) report that they are not allowed to use the toilets they feel comfortable in at school. This often forces them to use no facilities at all (holding it in, which can lead to health issues) or to use a toilet where they might face harassment. Alarming, one in five trans students (20%) have reported being bullied in school toilets. These statistics are unacceptable and highlight why change is needed. No child should feel fear or distress about something as basic as going to the loo. By amending the School Premises Regulations 1999 to clarify that gender-neutral toilets may be provided, it empowers schools to take a proactive step in protecting these vulnerable students. Some schools might have been hesitant or unsure if they could alter toilet provision under the old regulations.’ (The statistics quoted have not been verified.)

To a lesser extent, comments suggested that gender neutral toilets have benefits beyond catering to the needs of trans and gender non-conforming learners, including reducing queues for female-only toilets and disabled toilets (18%).

‘The opinions of the Supreme Court - it would seem - are attempts to drive trans people out of daily life. One such way that this is happening is how it has been suggested that they should use the disabled toilets. Obviously, this negatively affects disabled people who need to use those toilets, especially when the trans person in question is able-bodied.’

There were also general comments which supported amending the regulations or expressed that providing gender neutral toilets was otherwise a good idea (5%).

However, it was apparent in the responses that respondents had various interpretations of what constituted a 'gender neutral' toilet, with some explicitly or implicitly taking this to mean a single occupancy toilet with a lockable door and washbasin. Others believed gender neutral toilets would take the form of private stalls with a shared washroom area.

'The thing with gender-neutral toilets is that they almost always consist of single-stall toilets - one stall, with a door that goes all the way up and all the way down, with the sink in the stall as well. These are far, far safer than multi-stall toilets at stopping bullying or harassment. Back when I was in school, half the stall doors didn't work properly, so you had to get a friend to guard the door - if you went in alone, you were at the mercy of girls who thought it was funny to deliberately barge the door open and then go "Oh, sorry" and leave it open; or, who would try and look over the top of the door. It was also a nightmare for anyone having any sort of hygiene-related emergency.'

'Girls and boys need separate spaces as defined by their sex in order to undertake their biological needs. Unless schools are planning on providing fully private cubicles that include a toilet and a wash basin with a door that goes from ceiling to floor, there's no guarantee that the right to privacy can or will be respected.'

Many of the responses commented on the positives or negatives of these configurations, rather than gender neutral toilets overall. However, it was apparent that there was a strong preference for single occupancy toilets, as respondents believed this would meet the needs of the widest number of learners (20%). It was thought that single occupancy toilets, when compared to communal toilets, would be equally available to all learners, resulting in general benefits including dignity for those experiencing hygiene emergencies and creating a secure environment in which bullying was less likely to occur.

Some respondents felt that single occupancy toilets would be the best option for trans and gender non-conforming learners. They felt it would protect them from being 'outed' by giving them equal access to the same toilet facilities as other learners and provide a safe environment from in-toilet bullying. It was also suggested that single occupancy toilets would protect the rights of those who wished to only use sex-separated spaces and reduce the possibility of conflict between trans learners and those wishing to protect single sex spaces.

'The current trans eliminationist agenda and resulting toxic discourse could simply be resolved by providing genuinely 'single occupancy toilets without retaining 'girls' and 'boys' communal toilets in the form of stalls.'

Some of these responses believed that single occupancy toilets were an alternative designation which Welsh Government had not considered and suggested explicitly recommending single occupancy toilets in the guidance.

When considering gender neutral toilets in general, rather than single occupancy toilets specifically, there were some additional concerns.

Some felt that providing gender neutral toilets in addition to sex separated toilets would result in trans learners being segregated into only using gender neutral toilets (15%). This may 'out' them and increase the potential for bullying. Some of these respondents believed that all toilets should be gender neutral to avoid the risk of either segregating or outing trans learners (9%). Similarly, another group of respondents felt that the consultation question's wording that that

schools 'may' provide gender-neutral toilets in addition to sex-separated toilets, should be strengthened to 'should' provide gender neutral toilets (6%).

'Gender neutral toilets should only be provided if ALL school toilets are made gender neutral, not as an addition to sex-separated toilets. Providing gender-neutral toilets in addition to sex-separated toilets could potentially lead to transgender children being directed to gender neutral toilets, whilst everyone else is directed to sex-separated toilets. This is a dangerous situation for transgender children as it will 'out' them against their will. Causing untold mental harm to the transgender child. This would also be a form of segregation, to segregate transgender children from non-transgender children. This is obviously a terrifying concept for transgender children and their parents/families/friends and will cause great emotional harm and mental health damage. It would also increase the risk of bullying for the transgender children which the 'Rights, Respect, Equality' guidance document is trying to prevent.'

'...care must be taken that the provision of additional gender-neutral facilities is not used as a reason or rationale to prevent transgender pupils from using the sex-separated facilities that align with their presenting gender, or to justify policies of exclusion and segregation for trans pupils. It cannot become a separate but equal division of facilities for transgender students.'

'Any additional gender-neutral facilities should be there simply to better cater to pupils' varying needs (as expressed by the pupils themselves), not so that trans pupils can be forced to use them and excluded from sex-separated facilities they would otherwise comfortably and safely use.'

There was a distinct cohort that were concerned that the amendments would diminish provision for single sex spaces, or create confusion about whether or not single sex toilets are legally required. While a small number just wished for greater clarity that any new gender neutral toilets would be provided in addition to, rather than in replacement of, sex separated toilets (7%), a number were concerned with the provision of gender neutral toilets conflicting with the legal rights of girls to access single sex spaces (4%). Amongst these concerns were comments that the amendment to the regulation would not prevent conflict with the 2025 Supreme Court ruling, and consequently with the Equality Act by discriminating against biological girls.

'Considering that the guidance acknowledges the enormous issue of sexual harassment/sexual bullying in schools - and the fact that it is girls being sexually harassed by boys in the vast majority of cases - then I am astonished at this suggestion. Gender neutral toilets impact on the safety, privacy, dignity and rights of female pupils. They contravene current school laws about toilet provision and the Equality Act 2010, especially in light of the Supreme Court judgement.'

'I understand that many schools currently have insufficient single-sex toilet facilities and that new builds have been pushed towards mixed-sex ones. Children's rights must be the priority and any attempt to remove those in such an underhand way in order to save money on adapting non-compliant school buildings is quite shameful. Welsh Government has legal obligations under the Rights of Children and Young Person's Measure and should be working to ensure that schools that have been misinformed about their toilet provision are able to put things right so that they comply with Buildings Regulation and the UNCRC.'

These respondents often raised safeguarding concerns, particularly about the vulnerability of girls in toilet settings and their risk of sexual harassment or bullying from boys (9%). These respondents emphasised the importance of sex separated toilets in maintaining the privacy and dignity of girls, as well as meeting the needs of those with specific cultural or religious beliefs.

‘Sex-Segregated Toilets Are a Legal Requirement and Safeguarding Necessity:

- The Equality Act 2010, Schedule 3, expressly permits single-sex spaces as a proportionate means to ensure privacy, dignity and safety, especially for children.
- Amending the regulations to promote gender-neutral facilities undermines the right to single-sex provision, particularly for girls during menstruation, pupils with trauma histories, or those with religious/cultural requirements.’

A number of these respondents felt the proposal to amend the Education (School Premises) Regulations 1999 should not have been made in this consultation. These respondents believed that the consultation document had not provided an adequate justification or evidence-base for making the proposed changes. Some suggested that such a change should require a separate consultation (4%).

‘We cannot think of a legitimate reason for this question to have been shoe-horned into this consultation. Under the current regulations schools are not prohibited from providing gender-neutral toilets as long as they already meet the requirements for single-sex provision set out in the regulations. The inclusion of this question looks like an underhand way of trying to obtain some sort of statistic to claim that there is support for a change in these regulations without proper consultation or even an explanation of why the change might be needed and the evidence base.’

‘I think it is outrageous that this question has been included. The document does not even mention the regulations and respondents have not been given enough information to make an informed response [...] Any changes to the regulations must go through a full consultation process and draw on evidence.’

#### 4.13 Question 13 – What, in your opinion, would be the likely effects of revising the 'Rights, respect, equality anti-bullying guidance' on the Welsh language?

- Do you think that there are opportunities to promote any positive effects?
- Do you think that there are opportunities to mitigate any adverse effects?

Code	Count	%
Welsh should be treated with parity with English / the Welsh language is important	27	25%
Language (including Welsh language) has not been sufficiently included in guidance	21	19%
Ensure bilingual delivery / all supporting materials and training should be equally available and promoted in Welsh	20	18%
Generally agree / think the guidance will be beneficial to the Welsh language / sufficiently takes into account the Welsh language / no negative effects expected	17	15%
Talking about others in a language they don't understand can be bullying / guidance does not take this into account	13	12%
Comment about the Welsh language unrelated to guidance	10	9%
No significant effects on Welsh language expected	9	8%
Improving school environment through guidance will create a better environment for learning Welsh	8	7%
Increase communication / publicity / understanding	7	6%
Comment not related to Welsh language (e.g. repeats earlier comments)	7	6%
Terminology needs careful translation / provides an opportunity to standardise translations / has an important role in spreading new terminology	3	3%
Promote Welsh medium school case studies	2	2%
Don't believe the Welsh language is relevant to the guidance / don't think this question is relevant	1	1%
Don't know / not sure	5	5%
Other	15	14%

**Base: 110 respondents**

Most commonly, respondents affirmed that they believed Welsh should be treated with parity with English, expressed the importance of the Welsh language, and stressed that people should not be bullied for using the Welsh language (25%). A number of other respondents also made comments about promoting the Welsh language which did not directly relate to the guidance, for example, that Welsh should be taught first in schools or encouraged in schools generally, or other comments generally around Welsh language promotion (9%).

Relatedly, respondents wanted Welsh Government to ensure bilingual delivery. This included providing all supporting materials and training in Welsh from the point of publication of the final guidance (19%).

'The proposals should ensure that all materials, communications, and systems are equally available in Welsh and English, and that providers can correspond or submit documentation in Welsh without disadvantage.'

A number of respondents felt that the risk of bullying based on Welsh language and other languages other than English had not been sufficiently included in the guidance (19%). Some raised the potential for learners to bully others by talking about them in a language they don't understand (12%), and said that this had not been considered either. Some respondents felt this type of bullying was a particular risk in Wales due to the prominence of the Welsh language.

'There is no acknowledgement of the existence of linguistic bullying and the negativity often experience by children because of their linguistic background or language preference. This may work in either direction, but it is more frequently Welsh speaking children and young people who experience this. If the Welsh Government is serious about meeting its targets on the Welsh language the negativity towards Welsh in informal interactions within schools needs to be countered.'

'While talking about someone in a language they don't understand is bullying and create a hostile environment, non-English speakers often face stigma around their non English language, and are often pressured to use English in public, even if everyone present is able to understand their native language.'

Other frequent comments expressed that the Welsh language had been adequately considered in the guidance, that they could foresee no negative impacts of the guidance on Welsh, and that the guidance would be beneficial to the Welsh language (15%). More specific comments reflected that reducing bullying and improving the school environment through the updated guidance would foster a better environment in which learners could learn Welsh (7%).

'I think that stressing the guidance on equality and promoting an understanding of history to do with the attempted erasure of the Welsh language could have a positive effect on learners' connection to their language and help them continue their use of it if, in the future, they encounter some pushback or difficulty for example in the workplace.'

Other comments suggested that increased publicity of the guidance could increase public awareness of new terms relating to bullying in Welsh (7%).

There were a number of comments about the need for careful translation and consistent use of terminology, with some seeing this as an opportunity for Welsh government to spread terminology in Welsh.

'It will be important, however, to ensure that any case studies or resources translated into Welsh are of high quality and that terminology is consistent. For example, terms like "bullying", "transgender", "non-binary" should have agreed Welsh translations (like *bwllo*, *trawsryweddol*, *anneuaid* or similar) so that staff and learners are clear on meaning. There's an opportunity here to standardize and promote Welsh terminology for equality and identity concepts. That's a positive effect: it enriches the Welsh lexicon and makes it easier to discuss these topics through Welsh. To specifically address mitigating adverse effects: since I do not really see direct adverse effects on the Welsh language, mitigation isn't needed in a large sense. Perhaps the only caution is to ensure that as new content is added (for instance, if the guidance introduces new terms or references), the Welsh translations are accurate and culturally appropriate. Engaging Welsh-speaking education practitioners in the development and translation process can safeguard this.'

Additionally, singular but unique comments suggested that Welsh Government needed to adequately check that the translation of the terms in the guidance does not result in scope for misinterpretation or ambiguity, particularly where they may require legal precision.



#### 4.14 Question 14 – In your opinion, could the revised 'Rights, respect, equality anti-bullying guidance' be formulated or changed so as to:

- have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English, or
- mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?

Code	Count	%
No - no changes are needed / no negative effects expected	14	19%
Yes – but no suggestions made	11	15%
Ensure parity of languages, e.g. all resources available in Welsh on publication	11	15%
Concerns Welsh speakers may be being bullied because of their language preference / suggest this should be covered in the guidance	11	15%
Guidance should encourage use of Welsh language e.g. as a part of a protected Welsh identity/culture	6	8%
Use case studies from Welsh-medium schools / Welsh specific examples / Welsh originating content	5	7%
Ensure up to date Welsh wording / make provisions for translation of sensitive terms / should be co-produced with Welsh people/expert organisations	4	5%
Those being bullied should be able to speak about it in their preferred language / should be accounted for in anti-bullying policies and procedures	3	4%
This question isn't relevant to the consultation or guidance / Welsh language is not important or should not be encouraged	3	4%
Concern that there is a potential for bullying those that don't speak Welsh / bullying by speaking about another learner in a language they don't understand	2	3%
Guidance will have positive impacts to Welsh through training, materials or resources / will embed respect for Welsh language / create a respectful environment in which Welsh would flourish	2	3%
Don't know / unsure	8	11%
See previous	10	13%
Other	11	15%

**Base: 75 respondents**

Similarly to the previous question, when it came to having positive effects or mitigating negative effects, some of the most common comments stressed having the guidance in place in the Welsh language from the point of publication (15%). These comments also emphasised that Welsh wording should be reviewed and kept up to date, and be developed with Welsh language experts to make provision for the translation of complex and sensitive terms.

Again, some voiced concerns about the guidance not sufficiently covering the scenario of Welsh speakers being bullied for their language preferences or Welsh identity (15%). However, as in the previous question, a small number also warned that there is a potential for those who don't speak Welsh to be bullied by Welsh speakers talking about them in a language they don't understand (3%).

Conversely, a small number suggested that the guidance might encourage use of Welsh language, for example, as a part of a protected Welsh identity/culture. This would be due to its potential to foster an inclusive environment in which Welsh can thrive, facilitated through the Welsh version of the guidance (3%).

In terms of suggestions to boost positive effects, a small number suggested using case studies from Welsh-medium schools or other Welsh-originating content. This would better engage with Welsh language users and make the guidance less English-language centric. These respondents encouraged testing of the guidance in Welsh to check for resonance with the terms used amongst Welsh speakers (7%).

‘This could be achieved by:

Developing bilingual resources in parallel, not as sequential translations. Guidance, toolkits, training modules, and templates should be available in Welsh and English from the outset.

Including examples and case studies drawn from Welsh-medium schools, not just English-language settings, so that Welsh-medium practitioners see themselves reflected in the guidance.

Making explicit that language-based bullying, including discrimination or mockery directed at Welsh speakers, is covered by the guidance and should be treated with the same seriousness as other forms of prejudice.

To mitigate negative effects:

All staff training linked to the guidance should be fully accessible in Welsh, not merely subtitled or partially translated.

The Welsh-language version of the guidance should be tested by first-language Welsh speakers in both school and local authority roles, to ensure clarity and cultural resonance.

With care and parity in implementation, the guidance can both protect learners from bullying and affirm the equal status of the Welsh language across all educational settings.’

Across both Q13 and Q14, there were a small number of respondents that felt that the Welsh language wasn’t relevant to the consultation, or disagreed with the need to consider the Welsh language. Others simply referred to their answers to Q13.

**4.15 Question 15 – 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:**

Code	Count	%
Support for the guidance (general and/or qualified) / thanks for the guidance or consultation's aims or content / comments which show support for helping marginalised groups or bullied children in general	13	20%
Suggestion made to amend guidance wording / definitions / terminology	8	12%
More content on involving or clarifying the role of parents / learners / Early Years settings / Estyn / other audiences is needed	8	12%
Include additional links to specific resources / training / legislation / references in guidance, and integrate better with existing guidance	8	12%
Reference to the consultation not sufficiently taking into account the recent Supreme Court ruling / Cass review / other relevant legislation or regulations regarding single sex spaces / safety of girls in gender neutral toilets / comments stating gender identity doesn't exist or is ideological	7	11%
Concerns about particular pressure groups influencing the consultation or guidance	6	9%
Importance of supporting trans people / concerns about restrictions or segregation relating to trans people resulting from the guidance	6	9%
Concerns about workload or pressure on schools to implement / their capacity to fund the changes	4	6%
Comment relating to language / Welsh language	3	5%
Suggestion to adopt a KiVa approach to training	3	5%
Believe the guidance does not uphold the Equality Act	2	3%
Concerns that the guidance could come into conflict with parental rights	2	3%
Concerns WG aren't prepared for the level of backlash to the guidance / risk teachers are caught in the middle / need consistent messaging / need to proactively lay the groundwork	2	3%
See previous	7	11%
Other	20	30%

**Base: 66 respondents**

When asked for any other issues which had not been addressed in the consultation, most commonly respondents used the opportunity to underscore the most important issues they had raised within the consultation.

Key topic areas which came up again in these comments included a concern about additional workload for teachers (6%), pressure groups exerting influence over the consultation outcome and final guidance (9%), made references to the Supreme Court ruling and Cass review in relation to maintaining single sex spaces, and expressed a concern about the safety of girls in gender neutral settings (9%).

Again relating to gender neutral toilets, some respondents warned more generally that they feel Welsh Government are not prepared enough for the levels of backlash that might arise from implementing this change, or were concerned that teachers would be on the receiving end of hostility to the changes from parents. Some recommended consistent or proactive messaging to communicate the changes (3%).

Others sought or reiterated a need for additional clarity about the role of parents, learners, Early Years settings, Estyn, or other audiences within the guidance (12%).

The most numerous comments expressed thanks for the opportunity to take part in the consultation, or positivity about tackling bullying or with the guidance overall (20%). Some made these comments in the context of their belief in supporting trans people, or expressing that trans people are particularly vulnerable. Others restated their concerns about the risk of gender neutral toilets having the potential to cause segregation of trans learners (9%).

However, there were a number of specific suggestions which were not prominent in the previous responses. These included requests for definitions or wording changes (12%):

- Suggestion made to amend guidance wording / definitions / terminology.
  - The guidance uses imprecise or interchangeable terminology regarding “sex” and “gender identity.”
  - The term ‘he or she’ is used in the guidance, language which doesn’t necessarily include non-binary or gender non-conforming individuals.
  - Clarifying the key audiences to the consultation
  - Clarifying what is meant by bullying behaviour and ‘harassment’
  - Putting in warnings before sensitive topics of self-harm and suicide
- Amongst these were also flags for minor factual inaccuracies:
  - A reference in the guidance to the Time to Change Wales campaign supporting young people, when this report was instead aimed at ending stigma and discrimination around mental health in the workplace.
  - A typo in the organisation name ‘Heads Above The Waves’

Additionally, some flagged additional resources which respondents believed should be included within the guidance (12%):

- Lucy Faithful Foundation and associated Shore web resource
- Childline
- A Children’s Rights Impact Assessment (CRIA) published alongside the guidance and periodically reviewed.
- NEU’s trauma informed toolkit
- Links to other Welsh Government strategies (e.g. ALN, digital resilience, safeguarding, Cymraeg 2050)
- Link existing data to support with self-evaluation such as School Health Research Network data.

Finally, three detailed responses advocated for Welsh Government to adopt a KiVa approach to anti-bullying policy. These comments outlined KiVa’s approach, provided detailed evidence of its effectiveness, and signposted to further resources. In addition, one respondent offered to support Welsh Government in its implementation (5%).

There were a number of unique comments answering question 15 that were not found elsewhere in the responses:

- That the guidance doesn't sufficiently consider the complexities of how the guidance would conflict with Catholic/religious schools
- That school faculty may also hold prejudicial views and consequently might benefit from unconscious bias training
- That related training (such as GDPR training) may be required, particularly when considering data collection when recording incidents
- That phased implementation plans should be considered, particularly for smaller settings
- That it should be made clear who bears responsibility if a school's anti-bullying measures violate the Equality Act or fail to protect a child
- That there should be a mechanism for legal redress or appeals process included in the guidance

## **5 Additional comments**

In addition to responses which followed the format of the consultation response form, thirteen respondents provided additional comments attached to their submission, as an introduction/preface.

Below we provide a list of points made by these submissions that have been made elsewhere in this report, separated into miscellaneous themes already covered in the report, themes relating to sex and gender, themes relating to question 12 of the consultation questionnaire, and finally, points that received less discussion in the main body of the report.

### **5.1 Miscellaneous points raised elsewhere in the report**

- Welcoming of the guidance.
- Providing an overall positive view of the guidance.
- A desire for greater national reporting of bullying incidents.
- Issues with the length, layout and structure.

### **5.2 Themes relating to sex and gender**

- Concerns that the guidance conflates sex and gender.
- As part of the above, concerns that the guidance is not adhering to legal rulings or other guidance (e.g. recent Supreme Court ruling or Cass Review).
- A feeling that there is lack of focus on misogyny, sexual harassment and sexist bullying.
- One respondent felt that some lesbians, upon coming out, experience bullying, and can sometimes, in response, identify as non-binary or trans boys, presenting themselves as non-sexual or heterosexual to appear more acceptable to those who bullied them.
- Concerns over schools adopting an 'affirmation only' approach.
- Recommend that the document uses 'sex' throughout and not 'gender' and re-write many sections, including the glossary.

### **5.3 Themes relating to question 12**

- Queries and concern over why question 12 (relating to gender-neutral toilets) was included, noting that this does not relate to the guidance document
- A perception and concern that 'mixed sex facilities are being installed as default in government-funded school building projects'
- Comments that 'gender-neutral' toilets are not gender-neutral, but 'mixed sex'

### **5.4 Themes which received less discussion in the main body of the report**

- That bullying behaviour should be considered in the wider context of behaviour management. This respondent noted that there has been an increase in variety, magnitude, and frequency of disruptive behaviours since the pandemic, ranging from backchat and rule-breaking to physical aggression and bullying. It was noted that this trend reflects a growing complexity in behaviour linked to broader social pressures—family instability, mental health, socioeconomic strain, social media influences, and more. It was felt that to address this issue, greater multi-

agency working is needed to tackle root causes, training is needed in schools to tackle de-escalation, effective practice should be shared, and better monitoring and reporting of bullying behaviour is needed.

- The guidance defines bullying as a repeated act rather than accepting that bullying can be an isolated act. The respondent noted that, whilst a victim of bullying may only report one act, the perpetrator may be bullying many pupils during the same period, and so the repetition lies with the behaviour of the perpetrator rather than the experiences of any individual affected. The respondents felt that the concept of repetitive behaviours be better explained within the guidance.
- The perception that equality impact assessments of incidents should be undertaken to identify whether teachers and pupils with protected characteristics are proportionately targeted by unacceptable behaviour.
- In section 3, the feeling that the inclusion of background evidence/statistics detracts from the content and should have been included at an appendix.
- 'LGB' and 'same sex attraction' do not appear in the glossary.
- Perceptions that the term 'intersex' is outdated, inaccurate, and can be offensive. A preference for 'Disorders/differences of sexual development' (DSDs) was preferred by this respondent.
- The omission of the Education Workforce Councils' Code of Professional Conduct & Practice (the Code).
- A feeling that that the guidance inaccurately describes the Public Sector Equality Duty (PSED), and should be updated to reflect its full scope and specific duties under Welsh regulations.
- A statement saying that the guidance should set clear expectations for schools to collect bullying data, especially related to protected characteristics, and use it to create and monitor equality objectives within a strategic equality plan
- That the guidance should clearly explain that positive action under the Equality Act 2010 allows schools to take steps to address disadvantage, meet specific needs, and increase participation amongst pupils with protected characteristics.

## **5.5 Final comments relating to the additional comments**

One additional response was simply to provide a list of references for the evidence provided in their submission, two provided an overview of their organisation, whilst another simply noted that pastoral leaders and education services were consulted as part of a consultation response.

As part of their response, one respondent said that some of the consultation or guidance documents did not work with their assisted technology: 'I am sending this as a straightforward email reply because your downloadable policy document doesn't work on my tech and severe illness/disability prevents me from being able to fill in the submission in the standard way.'

This section provides an overview of the viewpoints provided through these additional comments. Strong viewpoints were provided, and were often very detailed. Welsh Government may want to read these responses in further detail.

## **6 Submissions**

### **6.1 Introduction**

One submission was received from Children in Wales, drawing on work delivered through their Young Wales initiative. This was the only organisational submission, but it provides valuable insight as it captures the views of children and young people directly.

#### **6.1.1 Background**

Young Wales facilitated workshops in three different settings across Wales to gather feedback on the revised guidance, with 47 children and young people taking part. To broaden engagement, Young Wales volunteers were also invited to share their views via an online Microsoft Form, which generated a further seven responses.

#### **6.1.2 Methodology**

Each workshop lasted 75 minutes. Facilitators introduced the guidance, created space for open discussion and supported participants to share their views either verbally or in writing. The workshops were designed to ensure that all children and young people could contribute in ways they felt comfortable. What follows is a summary of the feedback received, structured by the audience types.

### **6.2 Primary School Feedback**

#### **6.2.1 Question 1: Do you know about the ways your school challenges bullying?**

Most children were aware of measures such as the Worry Box, Wellbeing Committee, Sensory Room and Worry Monster. However, some saw these more as emotional support than anti-bullying tools. One explained 'We have a worry box and if we're sad or worried we put a sticky note'. Others were less clear 'No. I don't understand'.

#### **6.2.2 Question 2: Do you know who you can talk to if you're worried about bullying?**

All participants could identify someone they would speak to, usually parents or teachers. Some also mentioned helplines - one said 'We can talk to any adult or call a number like Childline or MEIC'.

#### **6.2.3 Question 3: If someone is being unkind or bullying you or a friend, do you feel okay telling an adult you trust?**

Most children said they would feel safe telling an adult, although some hesitated if the bully was a friend. One noted 'If it's not my friend, I'm fine telling an adult. If it is my friend, it is harder telling an adult'. Another said 'I feel fine telling an adult but sometimes I can be scared'.

#### **6.2.4 Question 4: Do you think the trusted adult will deal with the bullying appropriately?**

Most trusted that adults would respond appropriately, though a few doubted teachers' consistency. As one child put it 'Sometimes. Not always because teachers sometimes ignore it'. Another raised the issue of confusion between banter and bullying 'Sometimes it depends on if it's banter or bullying and the child thinks with banter that's bullying and bullying is banter'.

#### **6.2.5 Question 5: Do you think this guidance explains how you can get help if you're being bullied?**

Children generally felt the guidance explained how to get help, linking it to school resources they already knew. One commented 'Yes we can use worry box or monster or tell a trusted adult and mom'.



### **6.2.6 Question 6: Do you think this guidance is easy to understand?**

Most agreed the guidance was easy to follow, though longer explanations could cause confusion. As one said 'Yes but sometimes I get confused so I can ask a question'.

### **6.2.7 Question 7: Do you think this guidance includes and supports everyone?**

All felt it was inclusive and supportive, with some saying it made them feel safer 'I feel like nobody is left out and this supports everybody'. Another reflected 'It made me feel safer and calmer'.

## **6.3 Secondary School Feedback**

### **6.3.1 Question 1: Do you know about your school's anti-bullying plan?**

Awareness varied across the young people consulted. Volunteers from different schools across Wales were often unfamiliar with their school's anti-bullying plan, with some describing it as ineffective or poorly explained: 'I was never told what to do – I got bullied', 'They do tell you talk to a member of staff but I feel they don't really take it seriously'.

By contrast, those in the school-based workshop were more aware of initiatives such as the Worry Button and Anti-Bullying Champions (ABCs). One participant explained 'The bullying button gives you an option of who you would like to speak to'. Another said 'I used it (the Bully Button) to help my friend'. However, some were reluctant to approach ABCs 'I would feel comfortable to speak to the teacher not the ABC members'.

### **6.3.2 Question 2: Do you know who you can talk to if you're worried about bullying?**

Participants identified a broad network of possible sources of support, including parents, teachers, safeguarding staff, counsellors and ABCs. One noted 'I usually talk to my mother'. Another described their experience 'I had learning support staff at school due to ALN and I was able to talk to support staff if I was worried who I got to know well and trusted... However, I don't think the mainstream young people had anything like this'.

In the school setting, systems like the worry box were also mentioned 'There is also a worry box which can be found throughout the school. If anyone has a worry, they can put it in the box. Teachers/ABC members keep an eye on this and respond to an issue'.

### **6.3.3 Question 3: If someone is being unkind or bullying you or a friend, do you feel okay telling an adult you trust?**

Most participants said they would feel able to report bullying, though confidence was often higher when speaking on behalf of a friend. For some, it depended on who the adult was: 'Depends on who really – if it's someone I feel I trust then why not?' Others were less certain 'I don't have an adult I can trust'.

### **6.3.4 Question 4: Do you think the trusted adult will deal with the bullying appropriately?**

Responses were mixed and often sceptical. Some felt adults would listen but doubted whether this would lead to action: 'Teachers are listening to what is happening but a lot of time nothing much happens about it'.

Others pointed to limits on what schools could do 'I think the staff would try really hard and do their best however I do think schools are extremely limited in how they can handle bullying... Someone who bullies is probably not in the best situation so supporting them would be the best way forwards in my opinion'.

There were also calls for stricter consequences ‘Punishments should be more severe – for example, requiring the offenders to do community service’. By contrast, some participants reported more positive experiences ‘They listen to both sides of the story’, ‘there’s restorative practice’.

#### **6.3.5 Question 5: Do you think this guidance explains how you can get help if you’re being bullied?**

Feedback was divided. Some felt the guidance was informative: ‘It’s okay really. It does include most things about bullying and ways to deal with it’.

Others saw it as too long or impractical ‘Yes but it’s a lot to read and no one is gonna use it’, ‘it does but I doubt people would read or act upon it’, ‘for someone with dyslexia, it is way too much writing’.

#### **6.3.6 Question 6: Do you think this guidance is easy to understand?**

Most agreed the guidance was clear in principle, but length was a barrier ‘It could help, sure, but it is way too much for us to read’.

A few felt it was not pitched appropriately ‘Looks more focused on primary school rather than secondary. It’s a lot of information and difficult to navigate if you just want to find out one thing’.

#### **6.3.7 Question 7: Do you think this guidance includes and supports everyone?**

Feedback was mixed. Some participants felt it was inclusive: ‘Yes it does. It includes everything about bullying’, ‘Yes it includes all kinds of bullying that might affect minority groups as well as making everyone more equal’.

However, others disagreed ‘Yes most but not all people’. Concerns were also raised about accessibility and imagery ‘For someone with dyslexia, it is way too much writing’, ‘the images and pictures weren’t always inclusive and sometimes a bit stereotypical – specifically the sexual (bullying) photo. It implies that domestic abuse can’t happen to men’.

### **6.4 Feedback on the Easy Read Version**

The Easy Read version was generally well received by secondary school participants. They found it clearer, simpler and easier to concentrate on than the full guidance. The layout and concise information were appreciated where one young person said it made the message ‘easier to get’.

However, there were also criticisms. Some felt it lacked detail, while others thought the images were inconsistent or uninspiring. One participant said: ‘Easy read looks like it was written by a 5-year-old’. Another explained ‘The images (photos of people) is very subjective’. Others suggested improvements ‘Having coloured pictures helps’ and ‘I prefer the cartoon images’.

While the simplified design was praised for accessibility, some participants wanted more engaging visuals and a more consistent style. As one put it: ‘It doesn’t really have enough information and the images are kind of concerning and they look boring’.

## 6.5 Online Form Returns

Seven Young Wales volunteers provided feedback through the online form. Responses were more limited and less detailed than the workshop sessions, but they still give an indication of awareness levels and confidence in the guidance.

Question	Yes	No	Don't know
Do you know about your school's ant-bullying plan?	7	-	-
Do you know who you can talk to if you're worried about bullying?	3	4	-
If someone is being unkind or bullying you or a friend, do you feel okay telling an adult you can trust?	5	1	1
Do you think the trusted adult will deal with the bullying appropriately?	3	3	1
Do you think this guidance explains how you can get help if you're being bullied?	3	2	2
Do you think this guidance is easy to understand?	4	2	1
Do you think this guidance includes and supports everyone?	3	3	1

Awareness of anti-bullying plans was universal among this group, but fewer than half felt confident that trusted adults would respond appropriately. Views on the guidance were also mixed, with some finding it easy to understand, just as many were unsure or unconvinced that it explained how to get help or supported everyone.

Two respondents provided further comments. One suggested 'Schools could deliver talks to ensure all learners are aware of support available, whilst also making those who engage in bullying more aware of the consequences and possible punishments they could face'. Another felt the guidance was more relevant to younger pupils: 'The guidance looks more focused on primary than secondary schools... it is difficult to navigate if you just want to find out one thing'.

## 6.6 Overall Reflections

Across the different strands of feedback, children and young people welcomed the revised guidance and felt it has the potential to make schools safer. Younger children in primary schools tended to be more positive and trusting of adults, while older participants in secondary schools were more sceptical, highlighting inconsistent responses, lack of resources and confusion between bullying and banter.

There were also calls for clearer communication, stricter consequences and more transparency around how bullying is handled.

The Easy Read version was valued for its simplicity and accessibility, though some found it lacked detail and criticised the images as bland or inconsistent.

The smaller number of online form responses reinforced this mixed picture, while all respondents knew about their school's anti-bullying plan, fewer than half trusted adults to act appropriately and several felt the guidance was better suited to younger pupils.

Overall, children and young people felt the guidance should be clearer, more engaging and consistently applied across schools, with visible support systems and trusted adults who act decisively. They highlighted that the guidance should not only raise awareness but also translate into real, practical change in how bullying is prevented and addressed.

## 7 Workshop feedback

As noted in the methodology, two workshops were held with representatives of organisations who work in fields closely related to bullying, or directly within this field. They were brought together to provide their thoughts on the strengths and weaknesses of the guidance.

### 7.1 Overall assessment

Overall, participants welcomed the Welsh Government's commitment to updating the anti-bullying guidance and aligning it with current priorities or issues. As one participant noted, 'I want to applaud and welcome this work. It's important... but there's still a lot to do to make the guidance genuinely usable'.

There was consensus that the updated guidance reflects national strategies (such as Anti-Racist Wales and LGBTQ+ Action Plans) in aiming to tackle prejudice-based bullying, and also acknowledges new policies or frameworks, such as the whole-school approach to emotional and mental wellbeing.

Whilst the guidance was generally welcomed and viewed positively, areas for improvement were also raised. Below, we review the strengths and weaknesses discussed by theme.

### 7.2 Language and tone

#### 7.2.1 Inclusive or consistent terminology

Participants stressed that the language used in the guidance must be inclusive, clear, and consistent. There was appreciation for using gender-neutral language, however, participants also noted that this was not consistently applied: 'What stood out most for me was the move towards more gender-neutral language... However, there were still points where 'he' or 'she' was used rather than 'they'. I felt that wasn't as inclusive as it could be and consistency on that would make a big difference.' It was felt that just one or two small missing or incorrect details such as this could alienate audiences, despite the vast majority of the guidance being viewed positively:

'There's actually a key point I wanted to raise about the language and inclusivity in the guidance. On page 35, point 32.3, it talks about homophobic, biphobic and transphobic bullying, outlining the different ways we refer to people in that context. But then, just a few points later - point 33.7 - there's a paragraph about "exclusions from the group", which says –

"This is slightly different from the silent treatment because it goes a step further from ignoring by making sure a child knows that he or she isn't allowed in the group".

"You can't really put "he or she" in that paragraph if you've just been talking about homophobic, biphobic and transphobic bullying, because it clashes. The wording has to be consistent - either we adopt an inclusive approach to pronouns throughout, or we don't. Otherwise, someone could easily pick up on that and see it as discriminatory. I just think it's a very clear example of where the language needs to align.'

#### 7.2.2 Avoiding stigmatising labels

A few participants felt that certain terms could carry unintended connotations. For example, a few participants disliked the guidance's use of the word 'perpetrator' to label children who bully.

There was a feeling that feel this term has a strong criminal or legal implication and they don't want to label a child in that way. There was even a feeling that some schools may be wary of reporting bullying incidents, as they may be uncomfortable using that term.

Participants suggested adopting softer language – for instance, saying 'a child who has perpetrated harm' instead, to describe such situations in a less accusatory tone. It was felt that small shifts like this might make the reporting of bullying incidents easier to deal with.

### **7.2.3 Clarifying definitions**

There were a few terms that were seen as technical or abstract that could do with better explanations. For example, the term 'resilience' was highlighted as problematic without context, with participants saying that different agencies interpret 'resilience' differently.

Additionally, there was a feeling that the guidance may conflate 'peer-on-peer sexual harassment' with 'sexual bullying' in places: 'The definition that needs urgent clarification is the one around peer-on-peer sexual harassment and sexual bullying. In the current draft, these terms are sometimes used interchangeably, but they are not the same. Young people have told us they prefer the term sexual harassment, because 'bullying' can feel like it downplays the seriousness of what's happened. A much clearer distinction is needed in the guidance.'

There was also strong support from some for changing instances of 'bullying' to 'bullying behaviour', throughout the document. It was felt that this is the terminology that people working directly within the field of bullying use.

### **7.2.4 Prejudice-based bullying and hate crime**

One participant was very strong in their feelings that prejudice based bullying can often be classed as such, although in many cases, should be more strongly defined as a hate crime, as it would outside of school.

'When it comes to using the term 'prejudice' in relation to bullying, schools need to be very careful in how they interpret and process that. The police define prejudice or hostility towards someone as potentially constituting a hate incident or hate crime. One difficulty we've had with schools is that they can sometimes downgrade experiences - for example, incidents related to someone's race or religion - to 'bullying' rather than recognising them as hate crimes....I think the guidance might need to give schools more context on what 'prejudice' means, so they fully understand its implications.

## **7.3 Implementation challenges and usability**

A reoccurring theme in the workshops was concern about how schools will practically use such a lengthy and detailed guidance document. Accessibility and length were repeatedly cited as barriers. Participants felt the document may be 'overwhelming' for educators who are extremely time-poor. It was felt that key message may be missed in such a large document, and that education practitioners need a document that is easier to digest.

### **7.3.1 Structuring by audience**

To improve usability, many suggested restructuring the guidance by audience. Participants felt that different roles – school leaders, classroom teachers, governors, local authorities, etc. – have distinct responsibilities in anti-bullying work. They felt that currently, all the information is

in one place, which ‘feels like you’d have to ‘control-Find’ just to locate what applies to you’. For instance, a concise ‘guidance for teachers’ with day-to-day practices, and a ‘guidance for governors’ focusing on policy and oversight, would allow audiences to quickly access relevant advice.

### **7.3.2 Presentation**

Alongside trimming and reorganising content, there were calls for better visuals to make the document easier to read and navigate. There were calls for flowcharts, checklists, infographics, and templates to be included within the document. There was a feeling that these types of visuals would help busy staff quickly understand procedures (e.g. how to report an incident, steps for intervention) without having to wade through long paragraphs of text or sections.

There was also a specific call for the guidance to provide standard templates for recording bullying incidents, perhaps available via Hwb.

Overall, it was felt that the document requires a bit of a restructure to make it more usable: ‘The whole document should be carefully curated, with graphics and visual tools to make it more accessible.’

### **7.3.3 Avoiding overload**

As well as the document being lengthy or difficult to navigate, there was a feeling that Welsh Government need to be wary of overloading teaching staff. Participants felt there are many pieces of new guidance or policies being published by Welsh Government, and the participants feared that practitioners might struggle to keep apace.

Some participants recommended launching the guidance in tandem with workshops or training sessions, to introduce the document and ensure teachers gain a clear understanding of its key topics before they are expected to use it.

There was also a suggestion to introduce an online version, with clearer navigation, so that education practitioners could easily locate and navigate information when dealing with incident of bullying.

## **7.4 Training**

In both groups there was strong feedback that implementing the guidance will depend on whether training and support is provided to schools. There was also a feeling amongst some that historically there has been a lack of training for teachers and school staff on bullying prevention and response.

‘By the time the guidance lands on their desk, they’ve had no training on how to put it in place. They’re expected to follow it, and the buck ultimately stops with them, even though they’re trying to be teachers and now, almost, social workers too.’

Without training, there was a feeling that even ‘with the best written guidance’, it may remain just a ‘document that just sits there rather than something that works in practice’

### **7.4.1 Training needs**

Participants identified particular areas where they felt training is most urgently needed, or where it is currently lacking:

- **Prejudice-Based Bullying:** There was a feeling that teachers lack confidence in handling incidents of racism, homophobic or transphobic bullying, disablist language, etc. Without training, participants felt that on some occasions, there is a risk these incidents get ignored due to discomfort, or even put down to ‘banter’.
- **Online/Cyberbullying:** Given the growing use of online media, there were suggestions that staff may require training in this area. As one attendee noted, educators may not be aware of the latest apps learners use or the risks they may face. It was also felt that teachers may require training and an understanding of their role relating to online incidents that occur outside of school hours, with participants feeling that teachers are sometimes unsure about.

#### **7.4.2 Follow-up activities or refreshers**

There was a feeling that training in this area should not be a one-off event. A few participants suggested that initial training should take place as part of an introduction to the guidance, but following that, there should be ongoing support in some way.

Participants suggested refresher courses, coaching on how to deal with incidents, or even online spaces where education practitioners could share challenges and successes.

#### **7.4.3 Having a lead member for bullying**

Another aspect of implementation discussed was designating a lead staff member in each school on bullying. A few participants cited having a dedicated anti-bullying lead responsible for driving implementation as effective practice. They felt this person could ensure training is provided to all staff and integrated into inductions for new teachers, and that the school’s anti-bullying policy is actively monitored.

### **7.5 Links to wider policies and frameworks, or other documents**

One participant noted that the reference to the material drawn from ‘That’s So Gay! Challenging Homophobic Bullying’ (2015) needs to be revised to cite a new version of this material, from ‘How to Stop Homophobic and Biphobic Bullying’ (2020).

#### **7.5.1 Whole-school approach**

A few participants spoke about their appreciation that the guidance placed an emphasis on a whole-school approach. They felt that this ensures that everyone (leaders, teachers, support staff, learners, and parents) share an understanding of what bullying is and how it is addressed.

#### **7.5.2 Trauma-informed practices**

One participant spoke strongly that they felt that trauma was missing in this document. They felt that there had been a great amount of work by the Welsh Government in this space, but felt the document was lacking in this area.

‘Another missing piece is advice on involving children and young people in reporting, in a trauma-informed way. In fact, trauma is completely absent from the guidance, which is a big gap. There’s been so much trauma-informed work across Wales and it needs to be referenced here.’



## 7.6 Inclusion

Participants felt that the draft guidance strongly addresses a range of identity-based bullying categories, such as racist, homophobic, transphobic, and disablist bullying – which participants viewed as a necessary emphasis.

The alignment with national inclusion priorities (like the Anti-Racist Wales Action Plan and LGBTQ+ Action Plan) was seen as a strength of the document. For example, stakeholders working with LGBTQ+ youth appreciated the guidance's recognition that a young person's home environment may not always be safe or supportive. They welcomed that the guidance explicitly advises caution in informing parents if a child may be at risk of harm or outing.

### 7.6.1 Areas that are missing or lacking in detail

Whilst participant felt that inclusion of different types of bullying, particularly prejudice-based bullying was strong, and perhaps the strongest aspect of the guidance overall, there were still areas that were felt to be missing or lacking in detail. This included:

- **Intersectionality:** There was a feeling that this is only briefly mentioned in the introduction: 'It's only mentioned as a term in the introduction, which feels tokenistic. We need a proper intersectional lens throughout the document to reflect that a young person can hold multiple identities, and these intersecting experiences shape their lives.'
- **Forms of prejudice that are on the rise:** Some participants felt that the guidance does not adequately cover, or has not adequately caught up with forms of prejudice that are on the rise. This includes misogyny and sexist bullying and antisemitism. One participant noted: 'We're also seeing a massive rise in antisemitism that needs to be recognised, alongside the very real attacks on the trans community'. There was also a feeling that bullying faced by Gypsy, Roma and Traveller children is not clearly covered.
- **Disability and neurodiversity:** A few participants felt that the draft guidance did not sufficiently cover bullying against those with learning disabilities, special educational needs, or neurodivergence. For example, help with complex questions such as how to potentially spot if a non-verbal child is being bullied.

### 7.6.2 Representation and lived experience

A few participants discussed the importance of involving those with lived experience in shaping school approaches or their understanding of issues. These participants felt that some governing bodies of schools 'don't reflect the diversity of Wales', which can lead to a lack of understanding as to the issues that some groups face, and the impacts of bullying on them. These participants suggested schools should make use of external expertise (e.g. charities specialising in particular areas of bullying e.g. racism, LGBTQ+, disability) for support, training or reviewing policies. They noted that the guidance does mention involving stakeholders, but they felt the guidance could be clearer or stronger in this area.

## 7.7 Data collection and monitoring

Many participants strongly felt that the current state of data collection on bullying incidents is inconsistent and inadequate. In turn, it was felt that this contributes toward a lack of understanding as to the level or types of bullying that are actually taking place.

### **7.7.1 Mandatory monitoring of bullying incidents**

Participants said that the draft guidance encourages schools to record and monitor bullying, however, they said that it does not make it a requirement. They felt that, if this aspect is voluntary, incidents may go unrecorded.

‘At the moment, there’s an expectation, but not a requirement, for schools to report into Welsh Government through local authorities. That means we can’t actually build a clear picture of where race-based bullying is happening’

‘The key thing I’d want to see is making the recording and monitoring of bullying incidents a mandatory requirement across Wales. At the moment, without clear and consistent evidence, we can’t properly support schools, fund community groups, or target interventions. Welsh Government needs to take responsibility for ensuring this is done consistently, otherwise the guidance won’t have the impact it should.’

‘Part of a strong foundational approach would also include having data, a proper dataset. In Northern Ireland, for example, schools are required to record levels of bullying and report that back to their local authority. Here, schools aren’t required to do that. Even though the guidance says they should collect data, it’s not a “must”.

Without that data, we don’t know who’s most at risk of being bullied or how effective anti-bullying approaches are. It means many schools will take on new strategies without knowing whether they work. Without a shared understanding of bullying and without the right data, we’re missing the groundwork we need before we can even start thinking about those most at risk.’

### **7.7.2 Improved tracking**

Even where schools do collect information on bullying, it was felt that schools may be unsure of how to use the data effectively. For example, going beyond merely collecting incidents, to categorising incidents to monitor trends over time, in order to respond to escalating forms of bullying within their school. Beyond tracking the number of incidents, and descriptions, it was suggested that schools should be encouraged or mandated to, perhaps with example templates, to log and categorise the factor behind the bullying (racism, disability bullying, etc., whilst remembering the importance of intersectionality where needed), location (e.g. playground, hallway, online), and the outcome for both parties (the person demonstrating bullying behaviour and the person being bullied).

### **7.7.3 Feedback**

A final point made was that without adequate logging and tracking of data related to bullying, was that local authorities and Welsh Government would not know the impact that any greater guidance has had. Equally, going forward, whether bullying is on the rise or has dropped, and for particular types of bullying.

## **7.8 Children’s voice**

Many participants felt that learners are often unclear about how to seek help when bullied. They felt that learners may have been told that they have a right to be safe, but are not always given easy practical steps on what they should do if they do not feel safe.

Participants also highlighted the possibility that learners involved in the co-production of school policies as a means of getting greater learner buy-in and trust into schools bullying policies. It was also felt that this may ensure that school policies are clear and easy to understand,

perhaps even resulting in different versions e.g. for staff at the school, learners, and finally, an easy read version. An example of effective practice was where anti-racism groups in schools were setup that survey pupils, meet senior leadership teams, review policy, and create legacy by recruiting new members each year.