



Llywodraeth Cymru
Welsh Government

Challenging bullying and harassment

Rights, respect, equality: statutory guidance for schools and settings

Guidance

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Contents

Who this guidance is for.....	2
Terms used in this guidance	2
Status of this guidance.....	2
Foreword from the Cabinet Secretary for Education	3
The role of school governing bodies	5
What bullying behaviour is, its motivations and wider implications	5
Prejudice-related bullying behaviour	16
Bullying behaviour in an online context.....	30
The law relating to bullying behaviour as well as related procedures and strategies	34
Strategies to prevent bullying behaviour	42
Responding when bullying behaviour occurs	55
Evaluation and accountability.....	61
Definitions of terms used in this document.....	63
Further help and advice	70
Helplines and support services	70

Who this guidance is for

This guidance is relevant to schools, governing bodies and local authorities in Wales.

This guidance can assist in developing and implementing anti-bullying policies and strategies and should be brought to the attention of all managers, staff and relevant professionals working within a:

- maintained or non-maintained school or setting
- pupil referral unit
- special school
- education other than at school setting

It may also be of interest to:

- management committees
- diocesan authorities
- professionals across health, social care and policing
- voluntary and third sector organisations involved with children and young people
- children and young people and their families

Terms used in this guidance

For the purposes of this statutory guidance, certain terms have specific definitions. Please refer to the 'Definitions of terms used in this guidance' section before reading this guidance.

In this guidance the term 'must' means that there is a legal duty to do or refrain from doing the specified action.

Status of this guidance

This is statutory guidance for local authorities and schools in Wales. The guidance is non-statutory for independent schools and may support them in meeting the standards set out in the Independent School Standards (Wales) Regulations 2003 made under section 157 of the Education Act 2002.

Governing bodies must have regard to this statutory guidance when:

- exercising their functions relating to the conduct of a school
- making arrangements for safeguarding and promoting the welfare of children and young people who are learners at the school
- when exercising their functions relating to promoting good behaviour and discipline at schools

Foreword from the Cabinet Secretary for Education

My priority as Cabinet Secretary for Education is to ensure our children have positive experiences in school and that they thrive in the nurturing and supportive environment school provides.

Sadly, despite our best-efforts school is not a positive experience for all children and young people. Our differences should never be the reason for someone to be bullied or mistreated, yet bullying behaviour continues to be a problem. Bullying can be a traumatic experience for children and young people. It can have a very real impact, particularly on their emotional well-being and physical health. Trauma and adversity can be both a cause and consequence of bullying behaviour, reinforcing the importance of a school culture which promotes inclusivity and belonging.

The 'Rights, Respect, Equality' guidance was originally published in 2019, and this revised version reflects changes in legislation and wider policy developments to ensure it remains relevant to the challenges facing children and young people today.

This guidance sets out the expectations on schools and local authorities to prevent, identify and respond to bullying behaviour in ways that are rights-based, trauma-informed and inclusive.

The Welsh Government's approach is focused on supporting schools in developing positive and respectful relationships among children and young people. This updated guidance:

- reflects the recommendations of the Children's Commissioner for Wales (CCfW) recommendations within the ['Spotlight Report: Take it Seriously': Children's experiences of Racism within Secondary Schools'](#)
- reflects the recommendations of the [Anti-Racist Wales Action Plan](#) by strengthening guidance on bullying behaviour on the grounds of race and the specific impacts of racial trauma
- takes account of the issues raised in Estyn's report '[We don't tell our teachers - Experiences of peer-on-peer sexual harassment among secondary school pupils in Wales - Estyn](#)' (December 2021)

The [Curriculum for Wales](#) is now being used in all maintained schools and by others providing education to learners aged 3 to 16. One of the four purposes of the curriculum is for children and young people to become ethical, informed citizens. This includes respecting the needs and rights of others, as a member of a diverse society. Relationships and sexuality education (RSE) is a mandatory element of the Curriculum for Wales. It must include learning that develops learners' awareness and understanding of different identities, views and values and a diversity of relationships, gender and sexuality, including LGBTQ+ lives.

In 2021 the Welsh Government published its framework on embedding a whole school approach (WSA) to emotional and mental health well-being. This framework supports all schools to adopt a 'whole school approach' to the emotional well-being and mental health of learners, teachers, school staff and the wider school community. The WSA Framework is intended to support schools, including pupil referral units (PRUs) and education settings, in:

- reviewing their own well-being landscape
- developing plans to address their weaknesses and build on their strengths

It also supports and complements the Curriculum for Wales, in particular the Health and Well-being Area of Learning and Experience. The framework sets out how schools should work in partnership with others, including the NHS and third sector organisations, to meet all the well-being needs of children and young people.

Tackling bullying behaviour and its impact is a key Welsh Government priority. It is vital to send a clear message that bullying behaviour is unacceptable and will not be tolerated. All incidents should be addressed in a trauma-informed way that prioritises safety and support for all learners involved. We want schools to be places of emotional and physical safety and for all learners to feel a sense of belonging. Adversity and trauma, no matter where it is experienced by children and young people, can lead to emotional distress and physical harm, which without the right early support can continue to have an impact on them for the rest of their life.

We are clear that schools must support children and young people who experience bullying. They must also work with those responsible for bullying behaviour to ensure the harm caused is understood and to find positive ways forward. Effective implementation of this guidance will play a crucial role in achieving these aims. Together, these expectations place respect, safety and belonging at the heart of how schools and local authorities prevent and respond to bullying behaviour.

Lynne Neagle MS

Cabinet Secretary for Education

The role of school governing bodies

School governing bodies are accountable for ensuring effective policies are in place to safeguard and promote the welfare of children and young people.

The school governing body decides what they want the school to achieve and should establish the strategic framework by:

- setting aims and objectives for the school
- adopting policies for achieving those aims and objectives
- setting targets for achieving those aims and objectives
- reviewing progress towards achieving the aims and objectives

The school governing body sets out a statement of principles for promoting positive behaviour and are required to have regard to guidance from the Welsh Government when making and reviewing the written statement of general principles on school discipline. The headteacher will use this statement of principles to lead work with the school community to determine the more detailed measures that make up the school behaviour policy.

Governing bodies should ensure that policies addressing bullying and discrimination are effectively implemented in practice, promoting a fully inclusive school environment with a zero-tolerance approach to bullying behaviour and discrimination. They should make use of relevant Welsh Government guidance, such as the pupil inclusion, wellbeing, behaviour and attendance framework, and ensure governors access appropriate training to fulfil these responsibilities.

School governing bodies and individual school governors should always act with honesty and integrity and be ready to explain their actions and decisions to staff, learners, parents and anyone with a legitimate interest in the school.

What bullying behaviour is, its motivations and wider implications

Context

Bullying is a widespread aggressive human behaviour and can be influenced by anger, prejudice, revenge or fear of others who are different. In some cases, bullying is a learned self-preservation behaviour. It is a maladaptive behaviour which can be developed in response to exposure to adverse and traumatic experiences.

The United Kingdom has been found to be one of the worst countries for children and young people's life satisfaction and bullying behaviour is mentioned as a cause

of this. Bullying behaviour can be a sign that there are other disadvantages in a child or young person's life, reflecting low overall life satisfaction.

Despite work by schools and other services, as well as government initiatives, bullying behaviour remains a problem. Bullying behaviour is not however, confined to school settings. Individuals may also use online and social media platforms to harass or abuse peers.

In the face of rising digital threats and broader prejudices expressed online and offline, challenging bullying behaviour is vital.

Bullying behaviour can lead to children and young people becoming lonely and socially isolated, which can intensify other challenges they may be facing and create barriers to positive connection and support.

Evidence on adverse childhood experiences (ACEs) in Wales shows how childhood experiences can affect a person's ability to form and maintain positive relationships with others during childhood and adolescence, as well as in later life. This reinforces the importance of supporting children and young people to build healthy, respectful relationships.

Stigma and discrimination over poor mental health can be a cause of bullying behaviour. Equally, bullying behaviour can also contribute to the development of poor mental health and well-being. Tackling the root cause of bullying behaviour is often an essential step towards improving a child or young person's mental well-being.

If bullying behaviour becomes dominant in a school, online or elsewhere no learner can fully enjoy their rights under the United Nations Convention on the Rights of the Child (UNCRC). This includes their rights to be safe and to receive an education.

Statistics showing the scale of bullying

Thousands of children and young people in Wales have said bullying behaviour remains their biggest concern. One of the reasons it regularly tops surveys as a primary concern, is that it affects so many.

Children and young people's calls for action to be taken by adults is supported by a variety of research. This research shows the devastating and long-lasting impact bullying behaviour can have, not only to the child or young person experiencing it, but also on those who engage in bullying behaviour and on bystanders. Severe impacts can be long-term, including poor mental health and reduced well-being. In some cases, parents may choose to remove their child from school.

The [Secondary School Children's Health and Well-being Dashboard: School Health Research Network \(SHRN\) Survey Data 2023 to 2024](#) includes responses from those aged 11 to 16 years. 130,000 learners in Years 7 to 11 took part, from 200 Welsh secondary schools.

The survey looked at young people's experiences of bullying behaviour. Almost 38% of young people said that they had been bullied in the previous couple of months, up from 32% in 2021. Results are higher than ever previously reported in the survey with more than 40% of girls being bullied compared to over 30% of boys.

In response to bullying online 21% stated they had been bullied online at least once or twice in the past couple of months. Bullying online was significantly higher among young people who identified as neither a boy nor a girl (44%), compared to boys (17%) and girls (24%).

More learners from less affluent families reported bullying behaviour compared with those from more affluent families.

In the 2024 to 25 period, Childline delivered over 6,600 counselling sessions for bullying behaviour concerns. The sessions dealt with issues including verbal abuse, physical abuse, exclusion, and online harassment in group chats or posts.

Bullying behaviour and school

Bullying behaviour:

- is harmful for all the individuals involved
- becomes the focus of a learner's experience of daily life
- undermines safety, well-being, and attainment
- can lead to distress and feelings of hopelessness, loneliness and isolation
- damages school ethos and reputation
- is detrimental to the school and the wider community
- affects bystanders and those who know it is happening in their school

Changes in society, communities and culture, including the impact of social media, can influence how bullying behaviour manifests in a school environment. Being aware of emerging trends and behaviours can support with the development of strategies to address and prevent all forms of bullying behaviour.

It is important to remember most children or young people do not display bullying behaviours. Positive, caring behaviour can be the norm at home and in society if the right school culture is developed.

Effective schools take a proactive approach to preventing all bullying behaviour and to mitigating its effects when it occurs. They do this by adopting trauma-informed

approaches like restorative practice and de-escalation, focusing on redressing harm and rebuilding trust.

Support for a child or young person who has experienced bullying should be informed by their wishes and needs in line with the Trauma-informed Wales Practice Framework. All schools should have regard to adopting this approach. This includes teaching children and young people and training staff about respect, positive behaviour, stereotypes and addressing prejudice, as well as building confidence to challenge unacceptable language and address issues in line with school protocols.

A trauma-informed approach also focuses on understanding what sits behind the bullying behaviour, in order to prevent it and reduce further harm. It is vital to increase staff awareness and understanding:

- of the ways adversity and trauma can affect learners' behaviours as well as their ability to form positive relationships with their peers and staff
- of how to identify trauma responses, such as being withdrawn and hypervigilance, from challenging behaviours

It also involves effective supervision for example, between lessons, at break times and at lunch times with suitable places provided for vulnerable learners during these times.

By implementing a Trauma-and ACE informed approach, a school can create a safe, supportive, and compassionate environment, in which all learners can thrive. [The TrACE organisational toolkit](#) and a range of supporting materials and resources can be found on Hwb. See the 'Bullying and mental health and wellbeing' section for more information.

Defining bullying

There is no legal definition of bullying in Wales or indeed in the UK. Therefore, the definition used in this guidance builds upon widely used principles established in the United Kingdom since 1993.

For the purposes of this guidance, bullying is defined as:

'behaviour by an individual or group which intentionally hurts others either physically or emotionally, which may include individual instances that are usually repeated over time'

Schools should have regard to adopting this definition. It is essential that schools define what is meant by bullying because this will form the basis of their anti-bullying policy and everyone, including all staff and learners, should understand what is meant by the definition. The definition should be used in professional learning, in

day-to-day anti-bullying work with learners and to clarify the position for parents. This will help to make the policy clear and consistent for the whole school community.

Learners should be consulted in the development of the school's definition of bullying behaviour and the associated policy for how the school challenges bullying behaviour. Learners should also be given a version of the school's policy with the definition explained clearly and simply.

Bullying is expressed through a range of hurtful behaviours. It can happen face-to-face or in the digital environment. It can be carried out by an individual or group but it generally happens in front of an audience to assert power or gain popularity. It may involve an element of secrecy so that adults are not aware of it.

Bullying differs from an argument, a fight or friendship fallout, because generally:

- it is deliberate or intentional
- repeated over time
- there is an imbalance or perceived imbalance of power between the child or young person bullying and the individual experiencing it
- bullying causes feelings of distress, fear, loneliness, humiliation and powerlessness

How bullying behaviour is expressed

Bullying behaviour can take many forms, including the following.

Physical

Kicking, tripping someone up, shoving them, injuring someone, damaging somebody's belongings or gestures of intimidation.

Verbal

Taunts and name-calling, insults, threats, humiliation or intimidation.

Emotional

Behaviour intended to isolate, control, hurt or humiliate someone.

Indirect

Covert or underhand actions carried out behind a child or young person's back or rumour spreading.

Online

Using any form of technology, online services or platforms, for example, gaming, social media, messaging services and forums. Online bullying behaviour can include threatening behaviour, abuse, harassment, shaming, exclusion, impersonation, malicious damage, non-consensual sharing of images or videos (including AI-generated) and coercion.

Relational aggression

Bullying behaviour that tries to harm a child or young person's relationship or social status. This includes:

- drawing their friends away
- exploiting a person's ALN or an illness
- targeting their family's social or financial status
- isolating or humiliating someone
- deliberately getting someone into trouble

Sexual

Unwanted touching, threats, suggestions, comments and jokes or innuendo. This can also include sextortion, 'revenge porn' and any misuse of intimate, explicit images of the child or young person targeted. When any of these incidents only involve those aged 10 to 17, situations will be considered on a case-by-case context, with some dealt with as a safeguarding and/or criminal matter. This issue is addressed further in the Welsh Government's peer-on-peer sexual harassment action plan.

Prejudice-related

Bullying behaviour towards a learner or a group of learners because of prejudice. This could be linked to stereotypes or presumptions about identity. Prejudice can and does also extend beyond the Protected Characteristics and can lead to bullying behaviour for a variety of other reasons such as social and financial status or cultural background. See the prejudice-related bullying section for more information.

Insults and banter

Children and young people will often protest that an incident was a joke or banter. If 2 friends of equal power are in the habit of bantering with one another it is not deemed to be bullying behaviour. If one learner uses banter to humiliate or threaten another who is powerless to stop it and made fearful by the act, the border between banter and bullying behaviour is likely to be crossed.

The distinctive elements of bullying behaviour

There are several distinctive elements associated with bullying behaviour. These include the following.

Intention to harm

Bullying behaviour is deliberate with the intention to cause harm. Children and young people who bully others are often know exactly how to humiliate or hurt someone. They pick on key aspects of their appearance, personality or identity that produces the effect wanted. They seek out the area in which they have power over the individual.

Harmful outcome

Someone or a group is hurt physically or emotionally. This can include making them:

- feel isolated, humiliated or fearful
- question their sense of self-worth

Direct or indirect acts

Bullying behaviour can involve:

- direct aggression, such as hitting
- indirect acts such as spreading rumours, revealing private information about someone or sharing intimate or 'deep fake' images with people for whom the information or images were not intended.

These acts are a way of controlling the other learner. When incidents involve those aged 10 to 17, situations will be considered on a case-by-case basis. Some will be dealt with as a safeguarding and/or a criminal matter.

Repetition

Bullying behaviour usually involves repeated acts of negative behaviour or acts of aggression which are controlling and emotionally abusive. An isolated aggressive act, such as a fight, is not usually considered bullying behaviour. Yet any incident can be the start of a pattern of bullying behaviour which develops subsequently. That is why incident records are so valuable.

Unequal power

Bullying behaviour involves the abuse of power by one person or a group who are perceived as more powerful, often due to their age, physical strength, popularity or psychological resilience and privilege.

Relational-based bullying behaviour

Relational-based bullying behaviour is a hidden type of aggression (or hostile behaviour) where peers harm 'others through purposeful manipulation and damaging of their peer relationship' (['Relational Bullying' by Stephanie Deverich, David A. Nelson et al.](#)) These acts of meanness may be difficult to detect because a child may attack their peer verbally or online and pretend it was all a joke.

Types of relational-based bullying behaviour include the following.

Stonewalling

Stonewalling or the silent treatment is where people ignore one another. If 2 children are angry with another child, they may choose to go about their business, ignoring the other child completely.

Exclusions from the group

Exclusion from a group is where a single member can be cut out from all activities and participation in a group, including online group chats. This is slightly different from stonewalling (the silent treatment), because it goes a step further from ignoring by making sure a child knows that they aren't allowed in the group.

Spreading rumours and gossip

Children will often say things about other people, behind their backs, within earshot or online.

Taunting

Taunting is another form of spoken relational bullying behaviour. It can occur online as well as to a person's face. Taunting often continues and even flourishes in the face of distress.

Making friendship conditional

Making friendship conditional is often noticed when the phrase, 'I'll only be your friend if...' is used. By making friendship conditional, it makes children overly cautious around their friends; those they should be most comfortable with.

The difference between unacceptable behaviour and bullying behaviour

Some behaviour, though unacceptable is not considered bullying behaviour. It is recognised that a one-off incident can leave a learner traumatised and nervous of reprisals or future recurrence. Intervention should be immediate whether it is bullying behaviour or any other one-off negative behaviour. One-off incidents that do not form part of a repetitive pattern of bullying behaviour should be handled as inappropriate behaviour and addressed under the school's behaviour policy in a trauma-informed way.

The following examples are cases, which would not normally be considered bullying behaviour.

Friendship fallouts

Friendship fallouts are not generally regarded as bullying behaviour. A friendship feud may however deteriorate into bullying behaviour enabled by the fact that former friends have an intimate knowledge of the fears and insecurities of one another. Children and young people who are targeted by former friends feel the betrayal deeply and are frequently isolated from their former friendship group.

Arguments or disagreements

An argument or disagreement between 2 children or young people is not generally regarded as bullying behaviour.

One-off incidents

Fights

Fights are not regarded as bullying behaviour. They should be addressed according to the school's behaviour policy unless it is part of a pattern of behaviour that indicates intentional targeting of another individual. Physical assaults should be stopped and addressed immediately, and in some cases police involvement may be appropriate.

Hate incidents

Unless hate incidents are repeated it would not usually be regarded as bullying behaviour, but it may still be criminal behaviour. This would need to be dealt with in accordance with the school's behaviour policy and other relevant policies. The school would need to involve the police if it appears that a crime may have been committed.

These examples illustrate the need to deal with the incident reported and record it. This should reveal any previously recorded incidents and allow a considered assessment to be made. Further information on reporting, recording and monitoring incidents is provided in the 'Evaluation and accountability section' of this guidance.

It is vital that all hate incidents motivated by prejudice towards a person's Protected Characteristic are accurately recorded to enable schools to monitor patterns and prevent discrimination. Local authorities frequently monitor hate incidents and may require schools to report these to show how they are complying with the Public Sector Equality Duty under the Equality Act 2010.

What motivates bullying behaviour

Children and young people who engage in bullying behaviour can have a range of motivations. They may have prejudices against certain groups in wider society. These prejudicial opinions may be informed by a wide range of factors including the following influencers:

- online and social media
- community and/or family values
- previous personal experience

Children and young people who display bullying behaviour may be motivated by a desire:

- for power and popularity
- to belong to a strong in-group with a robust sense of identity and self-esteem
- to avoid being bullied themselves
- to compensate for humiliations, which they themselves have suffered in the past, which may be linked to wider need around abuse, neglect or other form of harm

Bullying and safeguarding

Some cases of bullying behaviour might be a safeguarding matter or require involvement of the police. An incident of bullying behaviour should be addressed as a child protection concern under the Children Act 1989 when there is 'reasonable cause to suspect that a child [or young person] is suffering, or is likely to suffer, significant harm'. Where this is the case, the school must report their concerns to their local authority's social services department.

The Welsh Government statutory guidance [Keeping Learners Safe](#) supports schools in creating and maintaining a safe learning environment for children. Local authorities and governing bodies of maintained schools (including maintained nursery schools), voluntary-aided and foundation schools, and further education institutions, must have regard to it when exercising their relevant functions (under section 175 of the Education Act 2002).

The link between bullying behaviour and mental health is well known. At its most extreme young people have taken their own lives as a result of being bullied, therefore combating suicide and self-harm in education is a priority area. In 2019 we published '[Responding to issues of self-harm and thoughts of suicide](#)' guidance which provides practical advice on how to help learners. It covers a general understanding of self-harm, signs to look out for, tips on how to have those conversations and what to do if they become aware that a learner is self-harming.

As part of the development of the [Suicide and Self-harm Prevention Strategy for Wales](#) we analysed evidence from stakeholders, submitted during a public consultation held in 2024, to better understand the key drivers of suicide and self-harm in Wales which includes a focus on children and young people. Objective 3 of the new strategy describes a targeted approach of support for those who need it most and recognises schools as a key setting. We know that certain groups in society including some children and young people, are at heightened risk of self-harm, for example younger girls. It is vital they have access to person centred support when and where they need it.

Bullying and emotional and mental well-being

The [Whole-School Approach to Emotional and Mental Well-being Framework](#) (WSA) seeks to support good emotional and mental well-being by strengthening the relationship(s) between:

- teacher and learner
- teaching staff
- the school senior leadership team and wider school staff
- the school and parents
- the school and other professionals working with the school
- the school and the wider community that surrounds the school

This will be achieved by embedding good well-being through teaching, as well as all the other aspects of school life. Schools should develop and implement an ethos that values inclusion, where everybody works together, contributing their individual skills and resources to the collective good. They should create a supporting environment where children and young people, with the support of teachers who operate in a culture that also values teachers' own well-being are encouraged to:

- fulfil their personal and academic potential
- thrive
- learn and emotionally develop.

Schools are part of the wider whole-system approach of support around children, young people and families. The [NYTH \(NEST\) framework](#) aims to create a shared language and understanding of supporting babies, children and young people's mental health and well-being. It brings health, social care, education and third sector together in partnership to provide a nurturing, empowering, safe and trusted 'NEST' of support around children and families. This creates a whole-system approach to mental health and well-being that considers the whole life of the child and the wider determinants of mental health and well-being. Well-being across education is one of its core principles.

The WSA and NYTH (NEST) frameworks are complementary and the WSA is the implementation method for NEST in schools. Together, these frameworks:

- provide a holistic approach to children's mental health and well-being
- promote clarity, collaboration and continuity of practice across each sector

It is important that all school staff know about the WSA and the actions being taken by their school to improve learners' and their own mental health and well-being. School staff with a responsibility for liaising with external agencies, for example, Child and Adolescent Mental Health Services (CAMHS) or charities working with the school, should share an understanding of the NYTH (NEST) framework.

The Welsh Government has also made a commitment to becoming a trauma-informed nation and to embedding the principles of the [Trauma-Informed Wales Framework](#) across public services, communities and society as a whole. The

Framework offers a Wales-definition of what it means to be trauma-informed, and sets out 5 practice principles, underpinned by 4 practice levels that describe the different roles people and organisations may have when supporting people affected by trauma. Implementing the trauma-informed approach at a system and organisational level enables everyone to respond to and support children and young people in a way that meets their individual needs.

Children and young people may have been exposed to ACEs and to other forms of adversity or trauma. This could be within their home or their community, where violence is normalised, or they may have been exposed to racism and other forms of discrimination. All school communities should adopt a trauma and ACE (TrACE) informed organisational approach. Further information, advice and training can be found on Hwb.

The Welsh Government's [Mental Health and Well-being Strategy](#) recognises that education is a vital part of the connected system when considering the mental health and well-being needs of children and young people. When carrying out consultation on the draft strategy young people consistently cited bullying behaviour as a significant threat to their mental health and well-being. This included online bullying behaviour, and the need for greater support and protection for young people online.

More information on how to consider these frameworks in the context of the school's policies and practice is available in the 'Strategies to prevent bullying behaviour section'.

Prejudice-related bullying behaviour

Prejudice in context

Prejudice-related bullying behaviour is often referred to as 'identity-based bullying', 'discriminatory bullying'; 'hate-related bullying'; or 'inequality-based bullying'.

Prejudice-related behaviours often reflect and reinforce stereotypes and discriminatory ideas which are present in wider society. These ideas and attitudes can involve hostility towards people on the basis of Protected Characteristics. The Protected Characteristics (included within the Equality Act 2010) are:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

None of the Protected Characteristics are less important than any of the others. Sometimes individuals may have more than one Protected Characteristic and may be subject to prejudice-related behaviour for a number of reasons.

Prejudice-related behaviour also extends beyond the Protected Characteristics to prejudices about other aspects of identity including:

- care experience
- social status
- family income
- national identity
- language
- accents
- gender stereotypes
- appearance for example weight or hair colour

Prejudice-related behaviour can also relate to experiences of poverty. This includes prejudices linked to family income or the impact of financial hardship on a child's daily life. Bullying behaviours may arise where a child is unable to afford school meals or school uniform or cannot take part in activities that involve a cost. For some children, living in a home without adequate heating or hot water may mean they are not able to wash themselves or their clothes. These circumstances can be stigmatising and may lead to bullying behaviours that cause significant emotional harm.

Care-experienced children may also be vulnerable to prejudice-related bullying. Social stigma, past trauma, the instability of their living situations and transferring into school at times when other learners are already settled contribute to their vulnerability to bullying. Identifying these vulnerable learners at transitions when they become vulnerable and providing additional support when needed may prevent bullying.

Dealing with prejudice-related bullying

Under the Public Sector Equality Duty, schools are under an obligation to ensure appropriate and effective action is taken to remove or minimise disadvantages encountered by children or young people due to their having Protected Characteristics.

All forms of prejudice should be challenged in accordance with the anti-bullying policy and considered on a case-by-case context, with some dealt with as a safeguarding and/or a criminal matter. For more information on how to develop an anti-bullying policy, see the section 'Strategies to prevent bullying behaviour'.

Prejudice-related behaviour of any kind is unacceptable. If motivated by prejudice or hostility against someone's perceived identity, it may lead to prosecution for being a hate crime. If an incident is a one-off occurrence and is not repeated, the incident is not usually considered bullying behaviour. However, a one-off incident may still require police involvement and lead to prosecution. All forms of prejudice should be challenged in the school using the most appropriate school policy. If it appears that a hate-related crime has been committed, the police should be informed.

Where prejudice-related behaviour is repeated by a child or young person, whether directed towards a single individual or towards a group of learners, the action becomes bullying behaviour.

Schools should assess local and school populations for any recent and rapid changes to ensure their prevention approaches have the appropriate focus. The following learners should be carefully considered within the context of a school's bullying behaviour prevention strategy:

- disabled learners
- LGBTQ+ learners
- ethnic minority learners
- learners from a religious background
- learners who may dress differently due to cultural and religious backgrounds
- learners with English and Welsh as additional languages
- learners with emotional health and well-being issues
- learners with additional learning needs (ALN)

Responding to all types of prejudice-related bullying behaviour

As with any incident relating to bullying behaviour, it is important to ensure that the child or young person is listened to and taken seriously, and that reporting is encouraged by all staff. It will not always be obvious that a child or young person is being bullied, nor will they always ask for help. Taking a kind, empathetic and compassionate approach to all in the school will create the environment where children and young people feel able to ask for help, if they need it. It will also create an environment which:

- can help prevent bullying behaviour by promoting respect for others
- ensures a culture and ethos that identifies harmful behaviours and encourages swift action to support all involved to prevent any escalation

Care-experienced learners, who shared their experiences of education with the Welsh Government, identified bullying as a key issue, rooted in stereotypes and stigma around being care experienced. Some care-experienced learners feel schools should educate other learners about what it is like to be care experienced, without identifying any young people, unless they have given explicit permission.

They identified that addressing stigma, challenging stereotypes and prejudice could help increase support and acceptance, helping prevent bullying. [This animation](#) highlights some of the experiences adopted learners in North Wales shared with Adoption UK.

The following information includes some specific areas to consider in relation to prejudice-related bullying behaviour.

Immediate response

Some schools have developed a shared consistent message which all staff can use if they hear discriminatory language, comments or 'banter'. It can be applied to any type of discriminatory bullying behaviour or language. In these schools a set phrase has been developed for all practitioners, pastoral teams, support and associate staff to use in response to incidents. This phrase can make it clear that:

- what has been heard is unacceptable
- every child or young person belongs in the school and has the right to be treated equally and with respect
- the practitioner will address this as soon as appropriate

This immediate response ensures a consistent way that all staff can confidently close down verbal abuse quickly and effectively. It is then important to follow up with the child or young person using this language to explain to them why this language is discriminatory, threatening or hurtful, and why there is no place for it in school or society. Practitioners can use their judgement as to whether it is more appropriate to follow this up immediately, for example in the classroom, or subsequently, for example, requesting the learner stay behind.

Supporting behaviour change

When responding to bullying behaviour, schools should also work with the child or young person displaying the behaviour to help them change it on an individual level. Where bullying behaviour or harassment is prejudice-related this work should also challenge the underlying prejudice. To be most effective, this work on an individual level with the child or young person displaying the bullying behaviour is reinforced by wider work across the whole setting to challenge discrimination, including through the curriculum.

Well-being support

Settings should automatically put in place ongoing well-being support if a learner reports prejudice-based bullying behaviour or harassment. Practitioners should determine the most appropriate support available in their setting, including ongoing pastoral support in the child's preferred language and support from school-based and/or external services. Taking a trauma-informed approach to supporting children and young people who are experiencing bullying behaviour is essential. All school staff must be trusted adults so that the child or young person knows:

- they are believed
- they are heard
- aware that if they ask for help it will be available to them

Ongoing check-in and review

In response to prejudice-related bullying behaviour schools should set meetings at intervals with the child or young person who experienced the behaviour to check their well-being and to ask whether the bullying behaviour or harassment is continuing. If it is, then further interventions can be put in place with all parties. Schools should not expect children or young people to automatically re-report. Children and young people who experience bullying behaviour often have higher absences, so if they are absent, ensure that they are pro-actively asked, with discretion, whether they are experiencing bullying behaviour or any other type of harassment.

Use data to plan preventative approaches

As well as responding to the individual, it is important to reflect children and young people's lived experiences in developing preventative approaches through the curriculum and wider policies. They have consistently highlighted that they value practitioners systematically addressing discrimination in this way. Sections around recording and preventing bullying behaviour and harassment outline how this can be achieved.

Bullying behaviour involving disabled learners and/or learners with additional learning needs (ALN)

Defining disability and ALN

The 'Terms used in this document' section gives the definitions of these terms for the purposes of this guidance. It should be noted that there will be some children and young people who are covered by the Equality Act 2010 but not the Additional Learning Needs and Education Tribunal (Wales) Act 2018 and vice versa, although a significant number of children and young people are likely to be covered by both.

Key issues for disabled learners and/or learners with ALN experiencing bullying behaviour

Reports from Mencap and the Anti-Bullying Alliance show that disabled children and young people and/or learners with ALN are more likely to experience bullying behaviour than their peers. The 2023 Children's Commissioner's for Wales 'Ambitions for Wales' consultation found that disabled children were more likely than their peers to report experiencing bullying behaviour. Schools should be proactive in countering this. However, it is important to remember that not all disabled learners and/or those with an ALN are bullied.

Disabled learners and/or learners with ALN and deaf British Sign Language (BSL) signing learners may be more vulnerable to bullying behaviour because:

- of negative attitudes towards disabled children or children with a learning disability
- lack of understanding of different impairments and conditions
- they may not recognise they are being bullied and therefore not report it
- they may be doing different work or have additional support at school
- they may not find the policies and procedures available to find support accessible to them, and are unable to effectively communicate their experience and needs
- they find it harder to predict other people's behaviour, interpret body language or facial expressions and guess what they're thinking or feeling
- they may be more isolated than others due to their impairment or condition, because of attitudes, culture and barriers
- they may find it harder to make friends because of attitudes, culture and barriers
- they may communicate, interact and understand the world in different ways
- they may also be experiencing bullying behaviour and adversity in the home or community and fail to report if no action is taken and reprisals are feared
- their support needs may also not be being met at home
- they may experience lots of change, for example, spending periods of time in different settings, with different professionals, moving from a mainstream to a special school, or spending periods of time accessing medical support.

Bullying behaviour towards disabled learners and/or those with an ALN and deaf British Sign Language (BSL) signing learners can take any of the traditional forms of bullying behaviour, such as conditional friendship, but it can also include some more specific behaviours such as exploitation and manipulation.

Conditional friendship

In these cases, a group will allow a child or young person to believe they are accepted into the friendship group. The group may however be using the child or young person or place condition on them to be part of the group. They might make the child or young person the subject of their jokes, use them to run errands or even engage in criminal activity for them.

Exploitative bullying behaviour

In these cases, the bullying behaviour takes the form of deliberately subjecting a child or young person to something they cannot tolerate. For example, if a child or young person is especially sensitive to sounds or smell, exploitative bullying behaviour might involve repeatedly making loud noises to startle them or spreading

food over their work. The eventual aim is to provoke the child or young person into trouble because they will gradually become more stressed until they have an outburst of anger and/or retaliate.

Manipulative bullying behaviour

In these cases, the child or young person displaying the bullying behaviour manipulates a child or young person who at first may not realise what is happening. They might believe the other child, the other young person or the group of children or young people like them and they are friends. The child or young person affected might be manipulated into high-risk relationships and the bullying behaviour becomes very controlling.

Responding to bullying behaviour involving disabled learners and/or learners with ALN

Schools should address bullying behaviour holistically while also considering the individual needs and circumstances of disabled learners and/or those with ALN. Under the Public Sector Equality Duty, schools are also under an obligation to ensure appropriate and effective action is taken to remove or minimise disadvantages encountered by learners due to their disabilities or ALN.

Social Model of Disability

In 2002 the Welsh Assembly Government adopted the Social Model of Disability as the foundation of its work on disability in Wales. It requires society to remove the barriers to promote equity for disabled people.

The Social Model of Disability offers a different perspective on disability stating that:

‘...disability is caused by the way society is organised, rather than by a person’s impairment or difference. The Social Model of Disability looks at ways of removing barriers which restrict life choices for people with impairments or differences. When barriers are removed, disabled people can be independent and equal in society, with choice and control over their own lives.’

The Social Model of Disability makes the important difference between impairment and disability. It recognises that people with impairments are disabled by barriers that commonly exist in society.

It is not the inability to walk that prevents a person entering a building unaided, but the existence of stairs that are inaccessible to a wheelchair user. Disability is socially constructed, and the Social Model of Disability requires society to remove the barriers, so all people have equality.

In schools removing barriers for disabled learners and developing a truly inclusive environment is a key element of an effective disability equality scheme and anti-bullying policy.

The Disability Rights Taskforce was established in direct response to the 'Locked-Out: Liberating Disabled People's Lives and Rights in Wales beyond Covid 19 Report'. Its purpose was to bring members together to address the inequities and barriers, which impact the lives of many disabled people.

Working to the principles of the Social Model of Disability, the Taskforce co-produced recommendations with more than 350 external stakeholders including children and young people, parents and a small number of schools. The [Disabled People's Rights Plan 2025 to 2035](#) sets out the actionable steps and longer-term outcomes required to create positive change for all disabled children and adults, in Wales.

The Children and Young People working group identified the need to create a more inclusive environment by addressing:

- disabled children's experiences of bullying behaviour
- ableism (discrimination and social prejudice against disabled children and adults)

Bullying behaviour can have devastating effects on a child's self-esteem and mental health. Tackling ableism is essential to fostering a culture of respect, inclusion and participation.

Homophobic, biphobic and transphobic bullying behaviour

Homophobic and biphobic bullying behaviour are specific forms of prejudice-related bullying behaviour motivated by prejudice against lesbian, gay and bisexual people. Homophobic and biphobic bullying behaviour can be experienced by any child or young person. It is not characterised by specific acts but by the negative attitudes and beliefs towards lesbian, gay and bisexual people that underlie these acts.

Transphobic bullying behaviour is a specific form of bullying behaviour motivated by prejudice against trans people. Transphobic bullying behaviour can be experienced by any child or young person, including cisgender learners. Sometimes children or young people who are gender non-conforming may experience transphobic bullying behaviour. Children and young people may also experience transphobic bullying behaviour if they have a family member or friend who is trans or non-binary. It is not characterised by specific acts but by the negative attitudes and beliefs towards trans people that underlie these acts.

Schools should incorporate anti-bullying work in the wider context of an equalities and social justice approach to respectful and healthy relationships and violence prevention as part of a whole-school approach to celebrating difference. This includes embedding LGBTQ+ issues across the curriculum in maintained schools. It

is mandatory for RSE to be LGBTQ+ inclusive for all children and young people in Wales.

As with any type of bullying behaviour or harassment, practitioners will need to consider information sharing carefully and share information with parents as appropriate. This is because children and young people may not report prejudice-related bullying behaviour if they think this will automatically lead to the involvement of their parent. Sometimes this may be to protect parents, particularly if they or family members have also been subject to prejudice in the past.

In incidents of homophobic, biphobic or transphobic bullying behaviour, or when bullying behaviour is focussed on an aspect of a young person's LGBTQ+ identity, the young person may have worries about how their parent will respond. This may be the case whether or not the young person is LGBTQ+, but this may particularly apply when a young person does not want to come out to their parents. Practitioners therefore need to exercise caution and sensitivity in how they share information with parents in relation to prejudice-related bullying behaviour.

Homophobic, biphobic and transphobic insults used in place of other insults or indirectly

In schools where children and young people believe they will not be challenged when using homophobic, biphobic and/or transphobic insults and/or actions, they may use such language or actions towards others they are targeting for other reasons, such as ALN or Race, religion or culture. Homophobic, biphobic and/or transphobic insults can be used as a proxy for the language and/or actions they know they are likely to be challenged for using, such as racist insults.

In schools, homophobic, biphobic and transphobic language and actions towards a child or young person can be wide-ranging and used directly or indirectly to:

- make fun of them or put them down
- insult them for having LGBTQ+ parents, relatives or friends
- criticise or mock their actions because of their sexual orientation
- imply something is unacceptable
- intimidate or make them feel uncomfortable
- bully by suggesting they are LGBTQ+ (this includes spreading rumours or gossip)
- bully because they do not conform to gender norms

Some material in this section is adapted with permission of the publishers from 'That's So Gay! Challenging Homophobic Bullying' By Jonathan Charlesworth. The content has since been revised and updated in How to Stop Homophobic and Biphobic Bullying: A Practical Whole-School Approach (2020).

Responding to homophobic, biphobic and transphobic bullying behaviour

Homophobic, biphobic and transphobic bullying behaviour require very sensitive responses. The family of the child or young person affected may respond in ways which distress the child or young person further due to community pressure, homophobic, biphobic and/or transphobic views, or possibly being unaware of their child's sexual orientation.

Schools should work with families to ensure the right support, at the right time, is provided for the child or young person to ensure the best outcomes for that child or young person.

Gender-based bullying behaviour

Gender-based bullying behaviour is based on attitudes repeatedly expressed in ways that demean, intimidate and/or harm another person based on stereotypical attitudes towards gender. Gender-based bullying behaviour may be physical, verbal or psychological, and can occur both on and offline. Children and young people who are perceived by others to not conform to dominant or stereotypical gender roles can be targeted by this type of bullying behaviour. It can be experienced by all children and young people.

Gender stereotypes can cause children and young people to feel they have to appear a certain way, adopt behaviours to conform to socially constructed expectations and behave in a way which is socially accepted as 'masculine' or 'feminine'. This can contribute to gender-based bullying behaviour, where children and young people are bullied if they do not conform to expectations.

Examples of gender-based bullying behaviour include:

- targeting a child or young person because their hairstyle, clothing or other aspect of their appearance do not conform to dominant gender expectations
- targeting a child or young person because their interests, hobbies or behaviour do not conform to gender stereotypes
- using language, threats or violence to demean, humiliate or intimidate children and young people because they are not conforming to dominant gender expectations

Sexist bullying behaviour

Children and young people can also experience bullying behaviour on the basis of their sex. There can be an overlap between whether bullying behaviour is on the basis of sex (biological attributes) or on the basis of gender (social expectations).

The child or young person experiencing sexist bullying behaviour can be, but is not always, a different sex to the child or young person displaying the bullying behaviour. That is, a female could be bullied by male learners, or a male could be bullied by female learners.

Misogyny and misogynistic social attitudes are perpetuated by structural inequality, which can be seen as a root cause of some sexist bullying. This can be reinforced through the media, community and family attitudes.

Examples of behaviours that can be part of sexist bullying behaviour include:

- sexist language being used to demean or intimidate an individual or a group, suggesting that one sex is superior or inferior, for example using misogynistic language to describe females
- threats or violence being used to demean, humiliate or intimidate children and young people on the basis of their sex
- language being used in a derogatory way, for example using the words 'female' or 'girl' as an insult

Sexual harassment and sexual bullying behaviour

Sexual bullying behaviour is based on attitudes repeatedly expressed in ways that demean, intimidate and/or harm another person because of their sex or gender. It may sometimes be characterised by repeated inappropriate sexual behaviours including harassment, groping, 'upskirting' and 'downshirting', all of which are criminal offences and use humiliating sexist language. In rare cases violence may be used.

Sexual bullying behaviour may be physical, verbal or psychological, and can occur both on and offline. Behaviours may involve suggestive sexual comments or innuendo including offensive comments about sexual reputation or using sexual language that is designed to subordinate, humiliate or intimidate. It may involve sharing explicit images online, sometimes by multiple people, coercion, or unwanted sexual touching.

Sexual bullying behaviour is also commonly underpinned by sexist attitudes or gender stereotypes. Sexual bullying behaviour and sexual harassment are terms which are often used interchangeably in schools with sexual bullying behaviour often regarded as a type of sexual harassment. Whether the incident is considered sexual bullying behaviour or sexual harassment, schools should address the issue through their anti-bullying, behaviour or safeguarding policy whichever is deemed most appropriate.

Responding to sexual bullying behaviour

Sexual bullying can affect boys and girls. However, girls and young women are most frequently harmed by gender-based, sexist and sexual bullying behaviour. Schools should treat all cases seriously.

Schools should consider all children and young people as potentially at risk of gender-based, sexist or sexual bullying behaviour, particularly where they are perceived by others to not conform to dominant or stereotypical gender roles.

The Welsh Government's [Peer-on-peer sexual harassment in education settings: action plan](#) sets out the strategic work that is being done to prevent and respond to peer-on-peer sexual harassment in schools.

Relationships and Sexuality Education (RSE) is a mandatory cross-cutting theme for all children and young people aged 3 to 16 in Wales. The RSE Code sets out learning at developmentally appropriate phases, and this includes learning about healthy relationships, keeping safe, online, and offline, and being confident to raise issues with responsible adults.

Bullying behaviour linked to race, religion and culture

This form of bullying behaviour describes a range of hurtful physical and psychological behaviours that makes a person feel unwelcome, marginalised, excluded or powerless because of their colour, ethnicity, faith (including lack of faith) or national origin.

Most public bodies in the UK, including schools, use the working definitions of racism and a racist incident. These terms were proposed in the report of the Stephen Lawrence Inquiry in 1999.

The report defined racism as 'conduct or words or practices which disadvantage or advantage people because of their colour, culture or ethnic origin'. It defined a racist incident as 'any incident which is perceived to be racist by the victim or any other person'.

Forms of racism

Historically, the term 'racism' has been used in situations where colour and physical appearance are considered to be significant markers of difference. However, there has almost always been a cultural element as well.

Racism around skin colour continues to be prevalent, and schools must continue to be alert to it and to challenge it. But there are also forms of racism, which are primarily to do with culture, customs, religion and ethnicity. These too must be addressed and countered by schools.

Schools should consider, for example, the following.

Gypsy, roma, traveller discrimination

Gypsy, Roma and Traveller people can experience misleading and harmful stereotypes and have been subject to historic and intergenerational experiences of oppression, discrimination, violence and trauma. Many of the stereotypes are still deep rooted in the public consciousness and attitudes in the UK, and across Europe. Negative representations in the media can further exacerbate prejudice.

Gypsy, Roma and Traveller ethnicities are protected under the characteristic of 'Race' within the Equality Act 2010 and prejudice towards Gypsy, Roma and Traveller people is racism.

Anti-migrant prejudice

The political discourse and media reporting around immigration has heightened tensions between communities and created a challenging climate for migrants in the UK. There is a trend of using dehumanising language when discussing immigration, for example words such as 'swarming' and 'invasive'. Migrants are often represented as a threat or a drain to public funds, and their motives for settling in the UK are regularly questioned. The media and certain political rhetoric also means that there is a lack of understanding of the difference between migrants, sanctuary seekers, refugees and their right to be in the Wales. This has led to children and young people who may have been born in the UK to parents with refugee status being told to 'go home' (meaning somewhere other than the UK). It has also led to the words 'illegal', or 'migrant' being used as a racial or xenophobic slur to describe them because they have a different colour skin or dress according to their faith.

Schools must be alert to these harmful narratives and consider how their actions could foster good relations and help to eliminate discrimination. Schools should also be aware that refugee and sanctuary seeking children and young people may have endured traumatic experiences in their country of origins, during their journeys to the UK, and during their time seeking sanctuary in the UK. Some will also be looked after if they have arrived in the UK without parents or family and may not have the support of family or culturally appropriate care. Incidents of bullying behaviour can deepen trauma and increase vulnerability. These young people are experiencing racial trauma, stigma and shame, which will require racially and culturally trauma-informed support and culturally competent and appropriate interventions. National or ethnic origins are included within the characteristic of 'Race' within the Equality Act 2010.

Antisemitism

The Welsh Government has adopted the International Holocaust Remembrance Alliance's (IHRA) working definition of antisemitism in full and without qualification.

This is as follows: Antisemitism is a certain perception of Jews, which may be expressed as hatred toward Jews. Rhetorical and physical manifestations of antisemitism are directed toward Jewish or non-Jewish individuals and/or their property, toward Jewish community institutions and religious facilities. In addition to responding when antisemitism occurs, schools have an important role in preventing antisemitism. This can be through proactive learning about antisemitism and its different forms and also through sensitive and appropriate Holocaust education. Schools can also ensure the curriculum includes positive representations of Judaism and the contributions of Jewish people and communities in Wales, the UK and beyond.

Anti-Muslim hostility (also known as Islamophobia)

Anti-Muslim hostility (otherwise known as Islamophobia) refers to hostility towards Muslims or Islam which results in discrimination against Muslim individuals and communities. These terms are not currently legally defined. Nevertheless, the effects of this prejudice are experienced by Muslim community members in our schools. Schools should play a part in countering anti-Muslim prejudice and hostility within their own spheres of influence. This hostility is not necessarily about specific Islamic religious beliefs and can instead seek to reinforce prejudicial stereotypes about groups and deny equal rights and respect to people of Islamic heritage.

Schools should consider, when recording incidents of racist bullying behaviour, that there should be distinct and separate categories for noting the basis of the racist bullying behaviour. Categories can include religious heritage, Gypsies, Roma and Travellers peoples, and refugees, migrants and sanctuary seekers. The 'Evaluation and accountability section' of this guidance provides information on reporting, recording and monitoring arrangements.

We know bullying behaviour is very often motivated by hostility or prejudice based on a person's actual or perceived race, religion or culture. At the root of such bullying behaviour is a view some people are different or 'other'. By 'othering' them through remarks and insults it becomes easier to see any group as set apart and de-humanise them. This can remove compassion. The role of schools in helping children and young people feel they belong is of immense value in building a cohesive society. Very young children do not see difference until they learn or adopt attitudes and prejudices which may be present around them.

Responding to bullying behaviour linked to race, religion or culture

Schools should work with children and young people, their families and communities to ensure the right support, at the right time, is provided to children and young people to ensure the best outcomes for that child or young person. Under the Public Sector Equality Duty, schools should:

- record information which will assist in forming part of their duty under the Public Sector Equality Duty to collect, analyse and publish information about their progress in achieving their obligations under the Public Sector Equality Duty
- ensure appropriate and effective action is taken to remove or minimise disadvantages encountered by children and young people due to their Protected Characteristics.

The [Anti-racist Wales Action Plan \(ArWAP\)](#) sets out several actions which aim to embed anti-racism within Wales' education system.

It is important that children and young people, their families and schools are encouraged to report racism. When they do this it is important that they are able to access trauma-informed and culturally competent support. Reporting incidents is a key part of putting in place appropriate and robust responses to racism. It helps schools plan preventative approaches and support their children and young people to participate in an anti-racist community.

Welsh Government is focused on ensuring that anti-racist training and the development of skills and tools to support education practitioners to be racially trauma-informed, is continuous, collaborative, and evaluative rather than a one-off, isolated, prescribed experience.

Appointing Equity and Diversity champions is one way to show the whole school community that equality is taken seriously.

Bullying behaviour in an online context

Balancing the use of technology in education with concerns about online harms and their effects on learners' well-being is essential. Schools play a vital role in supporting learners to develop the knowledge, skills and strategies to navigate the digital world safely and responsibly.

For many children and young people, there is little distinction between their online and offline lives. They are 'digital natives', growing up using technology and social media as a natural part of their everyday lives. However, access to devices and online experiences may vary considerably.

The Online Safety Act 2023 places new duties on online platforms and services to protect children and young people from harmful and age-inappropriate content and provides clearer routes for reporting concerns. However, its effectiveness depends on how well platforms implement these responsibilities. Schools continue to play a crucial role in guiding learners towards safe, respectful online behaviour.

While technology can be misused to facilitate traditional bullying behaviours, such as insults or rumour spreading, it also provides additional ways to bully and humiliate others. These include:

- the non-consensual sharing of images or videos, (see the guidance on [responding to incidents of sharing nudes and semi-nudes](#))
- live streaming
- using anonymous messaging apps
- harassing someone online
- creating images or videos using generative AI technologies

Online bullying behaviour is often a continuation of bullying that happens in person, but it can also take place independently.

Anonymity online often leads to disinhibited and cruel behaviour that would be less likely face-to-face. It can change traditional power dynamics seen in offline bullying behaviour. The vast audience for online content means single incidents of online abuse can quickly escalate into bullying behaviour, for example, by reposting, sharing and comments.

Online bullying behaviour is often more pervasive, intruding on private spaces. Content posted online can also be difficult to remove. This means it can affect the child or young person long after the incident. Digital communications leave a trail, providing evidence of bullying behaviour. This can be both a positive and a negative aspect, as it can help in addressing the bullying behaviour but also means the harmful content is recorded.

Online and offline bullying behaviour can crossover when incidents that start in person continue online, or when online harassment leads to face-to-face confrontations. There are examples where bullying behaviour incidents that began offline were filmed and then posted online, causing the situation to escalate. Children and young people report that the following features of online bullying behaviour make the experience uniquely distressing:

- the audience can be unlimited
- it can occur anywhere and at any time, there is no respite from it
- it can involve unknown people although most cases involve known peers
- technology facilitates the storage of images and messages for repeat viewing

How Curriculum for Wales supports online safety

Digital competence is a cross curricular responsibility, together with literacy and numeracy, within the Curriculum for Wales in maintained schools. The Digital Competence Framework (DCF) has 4 strands of equal importance. The strands are:

- Citizenship
- Interacting and collaborating
- Producing
- Data and computational thinking

The focus of the 'Citizenship' strand is on children and young people developing the skills and behaviours to contribute positively to the digital world around them. This includes protecting themselves online. The strand includes the elements of:

- Identity, image and reputation
- Health and well-being
- Digital rights, licensing and ownership
- Online behaviour and online-bullying

The skills developed through this strand will help children and young people to critically evaluate their place within the digital world, so that they are prepared to encounter the positive and negative aspects of being a digital citizen.

The 'Interacting and collaborating strand' also allows children and young people to explore both formal and informal methods of communication including social media and instant messaging. Children and young people will not only look at how to store data, but also the implications of data laws and how to share information appropriately.

The rapidly evolving digital landscape and emerging technologies present both opportunities and risks. The '[Keeping Safe Online](#)' area on Hwb is designed to enhance online safety in education. It offers a wide range of resources, guidance, and training to help the entire school community stay informed about the latest trends and safety concerns and seek help when they need it.

Responding to online bullying

Schools should address online bullying behaviour where it has an impact on the well-being of children and young people at the school. Where necessary, schools should refer a case to the appropriate agency or service. Action must be taken in cases that involve a safeguarding concern. All staff should receive regular training on safeguarding and online safety.

Online and mobile communications leave a digital trail. Keeping evidence is essential. Schools should be mindful that evidence can be taken down or disappear from online platforms at any time. Content may be removed by individuals or at the request of corporate administrators of social media platforms. Screen grabbing is a useful route to preserve evidence. Schools should log and record incidents as part of their wider safeguarding practice. In some cases, further evidence may come to light at a later point, and it may become necessary to review the entire history of the case

again. Further information and guidelines on recording information is provided in the 'Reporting, recording and monitoring' sub-section of this guidance.

Schools have powers to discipline children and young people for online incidents taking place off the premises and powers to search or confiscate mobiles where children and young people have contravened the school behavioural policy or anti-bullying policy and the confiscation is the disciplinary penalty resulting from the contravention.

The law relating to bullying behaviour as well as related procedures and strategies

There is no legal definition of bullying, but broader legislation can be applied to address certain acts of bullying behaviour.

Legislation has been made in Wales, the UK and internationally which aims to protect the rights of children and young people to a life free from abuse and harm including bullying behaviour. Existing legislation and international conventions with relevance to bullying behaviour in Wales include:

- Protection of Children Act 1978 (as amended)
- Public Order Act 1986
- Malicious Communications Act 1988
- Criminal Justice Act 1988
- Children Act 1989
- [Welsh Language Act 1993](#)
- Education Act 1996
- Protection from Harassment Act 1997
- Crime and Disorder Act 1998
- Human Rights Act 1998
- Education Act 2002
- Sexual Offences Act 2003 (as amended)
- Children Act 2004
- United Nations Convention on the Rights of the Child
- United Nations Convention on the Rights of Disabled Persons
- [Government of Wales Act 2006](#)
- Education and Inspections Act 2006
- Learner Travel (Wales) Measure 2008
- Equality Act 2010
- Rights of Children and Young Persons (Wales) Measure 2011
- School Standards and Organisation (Wales) Act 2013
- Social Services and Well-being (Wales) Act 2014
- Serious Crime Act 2015
- Counter-Terrorism and Security Act 2015
- Additional Learning Needs and Education Tribunal (Wales) Act 2018
- Sentencing Act 2020
- [Welsh Language and Education \(Wales\) Act 2025](#)

The following sub-sections give further information on some of these pieces of legislation.

Core safeguarding and education legislation

These are the foundational statutory duties placed on schools and local authorities.

Education Act 2002

The Education Act 2002 places a legal duty on maintained schools and local authorities to safeguard and promote the welfare of children and young people.

Children Act 1989

Some incidents of bullying behaviour may also be or reveal, a child protection issue. An incident of bullying behaviour should be addressed as a child protection issue under the Children Act 1989 when there is 'reasonable cause to suspect that a child or young person is suffering, or is likely to suffer, significant harm.' These concerns must be reported to the member of staff in school responsible for child protection and then reported to the local authority's children's social services. This responsibility now extends to bullying behaviour incidents online where it has an impact on the well-being of children and young people at the school.

Children Act 2004

The Children Act 2004 places a statutory duty on all authorities delivering children's services to collaborate with stakeholders and partner agencies to deliver integrated services and improve preventative and early interventions for children and young people and their families.

Education and Inspections Act 2006

Under section 89 of the Education and Inspections Act 2006 ('the 2006 Act') the headteacher of maintained schools is required to determine measures to:

- a) promote, among learners, self-discipline and proper regard for authority
- b) encourage good behaviour and prevent all forms of bullying behaviour amongst learners
- c) secure that the standard of behaviour of learners is acceptable
- d) secure that learners complete any task reasonably assigned to them in connection with their education
- e) regulate the conduct of learners

In determining such measures, the headteacher must act in accordance with the behaviour policy, which all schools are required by the 2006 Act to have. Procedures outlining how a school will address bullying behaviour and strategies for challenging bullying behaviour should be clearly set out in a school's anti-bullying policy. These measures must be communicated to all learners, school staff and parents. The headteacher must follow through and adopt the policy and all learners, parents and teachers should be notified of it once it has been decided.

Under section 89 of the 2006 Act headteachers can determine measures to regulate the conduct of learners when they are off-site or not under the control or charge of a member of staff. This is of particular significance to online bullying behaviour which often takes place out of school but can impact very strongly on the school life of those learners involved.

Section 94 of the 2006 Act also provides a defence for school staff in confiscating items, such as mobile phones, from learners if they are being used to contravene the school behaviour and/or anti-bullying policy and are being confiscated as a disciplinary penalty.

Learner Travel (Wales) Measure 2008

The Statutory Travel Behaviour Code (the Travel Code) made by the Welsh Ministers under section 12 of the Learner Travel (Wales) Measure 2008 sets out specific requirements regarding the behavioural conduct of learners when travelling. The Travel Code requires all learners to 'never bully other learners' and 'respect others (including the bus driver)'.

The purpose of the Travel Code is to promote safety when travelling, by laying down a set of behavioural standards across Wales, for all learners, irrespective of the mode of travel. This includes:

- contract buses
- public buses
- public trains
- walking
- taxis
- scooters
- motorbikes
- cycling
- journeys in cars

It applies to all learners under the age of 19 years (or who have reached 19 but started a course when under 19 and continue to attend that course).

The Travel Code guidance sets out the framework for the sanctions regime within the Travel Code, which provides for the removal of free or subsidised transport for set periods of time if a learner misbehaves on learner transport.

There may be circumstances where the behaviour of the learner is not appropriate to be addressed through the Travel Code. In these cases, schools should work with their local authority, parents and other services such as health professionals, police and social services. Bullying behaviour may be an example of this.

The Travel Code should form part of a school's behavior and anti-bullying policies. Any misbehaviour, including bullying behaviour, on the journey to and from school should be dealt with using the most appropriate policy, such as the school's behaviour or anti-bullying policies or by enforcement of the Travel Code.

Additional Learning Needs and Education Tribunal (Wales) Act 2018

The Additional Learning Needs and Education Tribunal (Wales) Act 2018, the ALN Code for Wales, and regulations made under the Act, provide the statutory framework for supporting children and young people with ALN.

Under the ALN Act children and young people with ALN are entitled to a statutory plan called an Individual Development Plan (IDP) that sets out their ALN and the additional learning provision necessary to meet those needs. The principles underpinning the ALN system include:

- inclusive education and a whole- school approach to meeting ALN
- early identification, intervention and prevention
- collaboration and integration of services.

The ALN system also takes a rights-based approach so the views, wishes and feelings of the child, child's parent or the young person are at the centre of the planning and provision of support.

Equality, rights and anti-discrimination law

These are the legal frameworks related to prejudice-related bullying.

The Equality Act 2010

The Equality Act 2010 provides protection from discrimination, harassment and victimisation to learners who have one of the Protected Characteristics set out in the 2010 Act.

The Public Sector Equality Duty requires schools to take action to improve outcomes for learners with different Protected Characteristics. It is a legal requirement, under the 2010 Act, which schools in Wales must follow. It can be used as a helpful mechanism to tackle prejudice-related bullying behaviour and implement a whole school approach.

The general duty has 3 aims, which each have clear links to anti-bullying. It requires schools in Wales to have due regard to the need to:

- eliminate discrimination and harassment and victimisation
- advance equality and opportunity
- foster good relations across all Protected Characteristics

To fulfil the 3 aims of the general duty, schools have 3 sets of specific duties:

- to collect, analyse and publish information about their progress in achieving the 3 aims of the 2010 Act
- to decide on certain specific and measurable objectives that they will pursue over the coming years to achieve the 3 aims and publish these objectives

and when undertaking the first two sets of specific duties:

- to engage with people who have a legitimate interest, including all staff, parents, learners, local groups, organisations, and individuals as appropriate.

Further information setting out compliance with this provision is outlined in the 'Evaluation and accountability' section of this guidance.

Human Rights Act 1998

The Human Rights Act 1998 sets out the fundamental rights and freedoms that everyone in the UK is entitled to. It incorporates the rights set out in the European Convention on Human Rights (ECHR) into domestic British law. The Human Rights Act came into force in the UK in October 2000.

The 1998 Act requires all public bodies to respect and protect an individual's human rights. These bodies include schools, local authorities, and other bodies carrying out public functions.

United Nations Convention on the Rights of the Child

In 2004, the then National Assembly for Wales adopted the United Nations Convention on the Rights of the Child (UNCRC) as a basis of all policy making for children and young people in Wales.

Section 64 of the Curriculum and Assessment (Wales) Act 2021 places a duty on schools, settings, and providers of EOTAS including PRUs to promote knowledge and understanding of Part 1 of the UNCRC, and of the United Nations Convention on the Rights of Persons with Disabilities, among those who provide teaching and learning.

Rights of Children and Young Persons (Wales) Measure 2011

In 2011, the then National Assembly for Wales passed the Rights of Children and Young Persons (Wales) Measure ('the 2011 Measure'), which strengthened and built on the rights-based approach. It placed a duty on Welsh Ministers to have due regard to the requirements of the UNCRC when exercising any of their functions.

The 2011 Measure underpins the framework and values for schools. Children and young people have a right to be safe and a right to an education.

Public authorities have duties that contribute towards the realisation of the right of children and young people stated in the UNCRC and 2011 Measure.

United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)

The purpose of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) is to:

- promote, protect and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities
- promote respect for their inherent dignity.

Disabled people include those who have long-term physical, mental, intellectual or sensory impairments, which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others.

The principles of the UNCRPD are:

- respect for inherent dignity, individual autonomy including the freedom to make one's own choices, and independence of persons
- non-discrimination
- full and effective participation and inclusion in society
- respect for difference and acceptance of persons with disabilities as part of human diversity and humanity
- equality of opportunity
- accessibility
- equality between genders
- respect for the evolving capacities of children and young people with disabilities and respect for the right of children and young people with disabilities to preserve their identities

Criminal offences relevant to bullying behaviour

Some online bullying behaviours could be criminal offences under a range of different laws.

Malicious Communications Act 1988

Section 1 of the 1988 Act makes it an offence to send an indecent, grossly offensive or threatening letter, electronic communication or other article to another person with the intention that it should cause them distress or anxiety.

Protection from Harassment Act 1997

The 1997 Act is relevant for incidents that have happened repeatedly (on more than 2 occasions). Section 1 prohibits behaviour amounting to harassment of another and behaviour which the person knows or ought to know amounts to harassment.

Section 2 provides a criminal offence if guilty of harassment and section 3 provides a civil remedy for the victim of harassment in section 1. Section 4 provides a more serious offence of someone causing another person to fear, on at least 2 occasions, that violence will be used against them. A civil court may grant an injunction to restrain a person from conduct which amounts to harassment and following conviction of an offence under sections 2 or 4, restraining orders are available to protect targets of the offence.

Protection of Children Act 1978

Under the Protection of Children Act 1978 (as amended) and the Criminal Justice Act 1988 it is illegal to make, circulate or possess indecent images of a child under the age of 18 years.

Serious Crime Act 2015

Section 67 of the Serious Crime Act 2015 inserts a new offence into the Sexual Offences Act 2003, at section 15A, criminalising sexual communication with a child. Under the new law, it is illegal for anyone aged over 18 years in England and Wales to send a sexually explicit message to a child or attempt to encourage the child to send something explicit themselves.

Online Safety Act 2023

Part 10 of the Online Safety Act 2023 introduces new criminal offences covering encouraging or assisting serious self-harm, cyberflashing, sending false information intended to cause non-trivial harm, threatening communications, intimate image abuse, and epilepsy trolling. These offences apply directly to the individuals sending them.

If school staff or parents feel that an offence may have been committed, they should seek assistance from the police.

Counter-Terrorism and Security Act 2015

The Counter-Terrorism and Security Act 2015 places a duty on schools in relation to the Prevent agenda. Schools must demonstrate that they are protecting children and

young people from being drawn into terrorism by having robust safeguarding policies in place to identify children and young people at risk and, where necessary intervene as soon as possible. This is relevant in the context of bullying behaviour because children and young people who are isolated, victimised and/or who otherwise feel they do not belong, can be more likely to fall prey to recruitment and grooming. There are 3 UK Government Prevent training modules available online, [Prevent Awareness, Prevent Referrals and Channel Awareness](#), all of which can be accessed in Welsh.

Broader legislation that supports children's rights in Wales

The Well-being of Future Generations (Wales) Act 2015

The Well-being of Future Generations (Wales) Act 2015 came into force in April 2016 and seeks to improve the social, economic, environmental and cultural well-being of Wales. It makes public bodies think more about:

- the long-term
- working better with people, communities and each other
- looking to prevent problems and take a more joined-up approach

The Act has 7 well-being goals, creating a vision to (among other things) make Wales healthier, more equal, globally responsible and more resilient.

The Welsh Language Wales Measure 2011

The Welsh Language Wales Measure 2011 provides that the Welsh Ministers can specify 5 types of standards in regulations: service delivery standards, policy-making standards, operational standards, promotion standards, and record-keeping standards. Although it is the Welsh Ministers that specify the Welsh language standards, it is for the Welsh Language Commissioner to decide which standards a body has to comply with.

Further information to support compliance with safeguarding responsibilities

Wales Safeguarding Procedures

The All Wales Practice Guides on safeguarding children in specific safeguarding circumstances are to be used in conjunction with the Wales Safeguarding Procedures. This includes guides on the following subjects:

- Safeguarding children from online abuse
- Safeguarding children when there are concerns about harmful sexual behaviour
- Safeguarding children from radicalisation

All practice guides are [available on Safeguarding Wales, the Wales Safeguarding Procedures website](#).

Youth Justice Blueprint

The Youth Justice Blueprint for Wales sets out our vision for youth justice in Wales, taking a ‘children first’ rights approach. This means working in a child-centred, trauma informed, rather than service-focused way, meeting the individual needs of children in the justice system or those at risk of coming into contact with it.

The Blueprint highlights how early intervention and prevention activities carried out by Youth Justice Services and partners has significantly reduced the numbers of young people entering the criminal justice system. Youth justice services work with children where there are concerns about entry into the youth justice system. This does not always mean that offending has occurred, as youth justice services may also work with children who have completed a court order, but who need additional support and assistance. Preventative work is voluntary and relies on the skills and abilities of professionals to engage with children and their families and carers.

The [Youth Justice Prevention framework](#) is a key component of the Youth Justice Blueprint. There are many services which help to encourage children away from offending and towards fulfilling, crime-free lives. This includes ‘mainstream’ devolved services such as education, healthcare and youth services, as well as more specific prevention activity delivered by specialised teams based in local authorities.

The framework sets out a holistic, evidence-informed view of what works to prevent children coming into contact with the criminal justice system and how activity from across different sectors comes together to support this. The framework developed in partnership with devolved and non-devolved partners ensures a joined-up approach. It reflects the strategic and operational landscape in Wales, and the unique position of youth justice and its overlap with justice systems and services concerned with children’s welfare. The framework complements a variety of broader prevention work being taken forward by the Wales Violence Prevention Unit and Criminal Justice Boards for Wales.

Strategies to prevent bullying behaviour

The importance of a whole-school approach to emotional and mental wellbeing

Preventing bullying begins with strong whole school structures. A whole-school approach, grounded in trauma and ACE-informed practice, is essential. Approaches developed collaboratively with staff, parents, and community partners, implemented over time, and reviewed regularly will be more effective than standalone initiatives.

Collaboration means working with children and young people and their families on the anti-bullying strategy, policy or approaches rather than asking their views after decisions have been made.

Interventions should sit within a broader school ethos that promotes empathy, respect and consistent expectations, and align with the Curriculum for Wales and school's approach to emotional and mental wellbeing, which schools must keep under review.

Schools should consider establishing an anti-bullying lead or team with responsibility for coordinating policy development, implementation, evaluation, and record keeping. This includes monitoring interventions used, reporting arrangements and training needs, particularly around prejudice-based bullying and online behaviours. Staff also require support in understanding their role in relation to online incidents that may occur outside of school hours.

To achieve a whole-school approach to emotional and mental well-being, schools should:

- have a strong moral leadership from the headteacher, other senior leaders, and the governing body, which models values and high expectations, thereby 'leading by example' by valuing health and emotional well-being.
- embed a climate and culture, where learners feel safe, secure, and valued, which promotes the UNCRC and UNCRPD, around seeking and listening to the voice of the child or young person.
- have a strong understanding of the health and well-being of learners and effective methods to monitor and evaluate this
- provide a curriculum that meets the needs of learners (both now and for their future), with learning experiences that support with and challenge learners about their health and well-being
- establish and maintain strong and responsive care, support, and guidance
- create an environment that promotes health and well-being by implementing the Trauma and ACE-informed organisational toolkit (this includes space to play and relax, maximising the benefits of outdoor learning, suitable toilet facilities, supporting healthy food and drink and ensuring site security)
- ensure effective communication and partnership working with parents
- support professional learning for all staff, tailored to meet their needs and responsibilities

What should be considered before choosing the approach

Schools should always adopt a whole-school approach for promoting positive, respectful behaviour between staff and learners as part of their whole school approach to health and well-being. This approach should be woven through all

school activity. Creating an environment which encourages positive behaviour and addresses the root causes of unacceptable behaviour. This will help create an inclusive, engaging environment where learners feel safe and are ready to learn.

Developing an anti-bullying policy

Schools should develop their anti-bullying policy as a separate policy document. However, it should link to the school behaviour policy, which schools must have by law. Policies and procedures should support and promote a trauma and ACE-informed approach.

School anti-bullying policies should outline:

- the vision and values of the school
- use the definition of bullying behaviour outlined in this guidance
- why it is important to prevent and challenge bullying behaviour
- how awareness of bullying behaviour will be raised
- how anti-bullying work will be embedded in the curriculum rather than an isolated annual event (such as during anti-bullying week)
- involvement of staff, learners, parents and school governors in development and implementation of the policy which takes a trauma-informed approach
- signs a child or young person might be experiencing bullying behaviour
- how bullying behaviour will be prevented including on journeys to and from school
- when the school will take action in relation to bullying behaviour online and outside the school
- how the school will respond to incidents
- how to report bullying behaviour
- what learners can expect
- what parents, the school community and others can expect
- how incidents will be recorded and monitored
- how learners and/or parents, the school community and others can appropriately escalate the matter if they do not feel that their concerns are being taken seriously
- how you will evaluate and review the policy and strategy

The importance of involving learners

Without the involvement of the children and young people in a school, anti-bullying strategies are not likely to succeed. Schools should fully engage learners in all stages of anti-bullying work.

Useful questions schools might ask prior to implementing anti-bullying strategies include:

- Do learners understand what is meant by bullying behaviour?
- Do learners understand that they can report other types of incidents which are not bullying behaviour?
- How can learners report a concern or bullying behaviour and are these effective or being used?
- Have learners' suggestions and observations been considered when developing this strategy?
- Have learners been fully prepared for the launch of a new strategy?

The importance of parental engagement

It is vital that children and young people are taught, both at home and in school, about building and maintaining respectful relationships. This is the foundation on which positive behaviour is based.

Parents have a significant role to play, as part of the school community, in taking responsibility for their child's behaviour inside and outside school, so too do schools.

Partnership working between the school and parents to maintain high standards of behaviour and to encourage respect and kindness towards other people is vital.

Issues around attendance, behaviour and exclusions can have an impact on the well-being of children. Preventing attendance and behavioural concerns from escalating, with the right support, can maintain learner engagement in education.

How to engage with parents

Schools should engage with parents, taking into account the following considerations when developing and rolling out an anti-bullying strategy:

- Are they aware of the new or existing strategy?
- Do they know how you would like them to report any concerns and how to appropriately escalate matters should they not be satisfied with the outcome of their initial concern?
- Do they know who to speak to when raising a concern about bullying behaviour and what evidence to provide?
- Have they been engaged to support their children and support the vision and values of the school?

There are a variety of techniques schools can use to encourage parents to engage:

- online feedback forms
- group meetings with staff and parents
- parents evenings to help families provide support for learning as well as allowing parents the opportunity to provide quality feedback on their child's progress and learning environment

- designing activities that learners can work on with their families
- sending messages digitally
- sending messages home via their children

When everyone understands that prejudice and discrimination is unacceptable, it helps to deal with incidents when they occur. If parents are not satisfied with the way the school has dealt with a case of bullying behaviour, which they reported they should be notified of the complaints procedure.

Engaging with families is a key element of the Welsh Government's Community Focused Schools approach. The published [Developing family engagement in Community Focused Schools](#) guidance sets out how within a Community Focused School, families are made to feel welcomed, listened to and valued. Their needs, and those of their children, are understood and catered for. They are encouraged to play an active role in their child's learning and are supported to best utilise and enhance the home learning environment, which includes the physical characteristics of the home, but also the quality of the learning support that they provide themselves. The guidance details some of the ways that schools can develop their family engagement provision. It provides an overview to prompt discussion and links to other relevant guidance where appropriate.

Making the policy effective

An effective anti-bullying strategy should set out how the school intends to coordinate its anti-bullying work within its whole-school approach to emotional and mental well-being. It should include developing a holistic range of interventions, which include preventing, identifying, responding to, and challenging incidents of bullying behaviour.

The overall approach taken by the school should be clear to all, with fair and consistent consequences and sanctions explained. The policy should clearly support the vision and values of the school and set out the school's equality objectives to meet the Public Sector Equality Duty under the Equality Act 2010.

The policy should be regularly updated with a full review and any relevant updates made at least every 3 years or sooner in light of new initiatives or broader policy changes. As part of the review, members of the school community should be consulted, including staff, learners, parents and support agencies and organisations, such as the school nursing service. Following a serious incident of bullying behaviour, schools may wish to review their policy and strategy and make relevant adjustments.

As part of the school's approach to ongoing training and development, staff should receive regular training on their anti-bullying policy and procedures including in relation to any new trends or concerns arising within the school. On induction all new staff should be made aware of the policy, the approach taken by the school and how

the procedures are administered. Playground, lunch time and school transport supervisors and school administrators should be fully aware of the policy and the procedures they should follow.

The anti-bullying policy should not just align with the school's behaviour policy, it should also interlink with RSE and broader mandatory school policies such as:

- safeguarding
- attendance
- acceptable use of ICT
- online safety
- travel behaviour
- exclusions
- the work of wider agencies which support the learner and school

Aligning policies will help schools ensure a whole-school approach is taken to multifaceted issues. For example, where a learner is absent from school, schools should work with the learner and their parents alongside family engagement officers (FEOs) and education welfare officers (EWOs), where appropriate, to determine the nature of the absence. If it is determined the learner does not wish to attend school because of bullying behaviour, the school's priority should be to address the root cause of the absence. Where various policies within a school are written by different individuals or groups, checks should be made to ensure they do not result in conflicting advice and inconsistencies. All policies should interact seamlessly and consistently using the same definitions, terminology and values.

Sharing the anti-bullying policy

The anti-bullying policy should be made known to all teaching and support staff, learners and parents. Schools should publish the policy on the school's website. Where this is not an option, schools should clearly outline how it can be accessed. Schools may also adopt an approach whereby the policy, or specific elements of it, are made available for learners digitally or in hard copies. This may help to embed the policy into school culture and extend the message to learners' homes too.

Schools should be very mindful of the behaviours being promoted in their settings. Focus should be made on positive behaviour and action, emphasising what learners should be doing, rather than concentrating on negative behaviour underpinned by a 'must not' culture.

Schools should ensure that communications are accessible and meaningful for all learners. This may include adapting communication as necessary, for example, some learners with ALN may require information to be conveyed using alternative methods such as visual supports or social stories. Information should be user-friendly and available in the languages used across the school community.

Before launching a new anti-bullying strategy, schools should:

- engage widely with the school community to ensure policies and procedures are relevant and update them periodically
- set clear and realistic objectives about what the strategy aims to achieve (awareness raising activities should be undertaken to promote these objectives among staff and learners)
- if needed, provide training on how to implement the objectives of the strategy

Actions schools may need to take to address bullying behaviour

Schools should consider motivations when working with children and young people who display bullying behaviours. This will help them to understand and address the root cause of the behaviour and help to change it, thereby reducing further incidences of bullying behaviour. They should also consider whether the root cause may be the child or young person's own experiences within their own home or community, which means the behaviour has either been learnt or normalised, or is a reaction to their own distress and trauma. This may lead to the need to involve other services to support the child and young person and their family.

Where bullying behaviour may reflect attitudes held by families, in society or expressed in the media schools will sometimes need to challenge these attitudes with the wider school community beyond the individual case of bullying behaviour presenting in school.

The power of language in challenging bullying

There is a debate about the language used when talking about bullying. Using language that includes bullying or aggressive words such as 'stamp out', 'kick out' or 'combat' bullying has been challenged. It has not been shown to reduce bullying behaviour effectively. Instead, it entrenches the notion that bullies have power, leading learners to aim to be one of the 'powerful' rather than the 'victim'. The aim is to create a respectful community whose members learn to live alongside one another without aggression.

When referring to the roles played in bullying behaviour, schools will need to adopt standard terms for reporting purposes. However, it is better not to label children and young people as a 'victim', 'bully' or 'perpetrator' schools may wish to adopt 'softer' terminology because:

- learners are often encouraged to 'hate bullying' which can then translate into hating individuals who bully
- 'bully' is a label a child or young person can internalise and live up to, or it can impede their ability to change their behaviour

- not labelling someone a bully gives them an opportunity to change their unacceptable behaviour and use their power or leadership in other ways
- although somebody who displays bullying behaviour's behaviour is disliked or unacceptable, they are not hated as individuals

Similarly, schools may wish to adopt 'softer' terminology related to victims of bullying behaviour because:

- labelling learners 'victims' can make them feel singled out and hinder their sense of belonging
- using the term victim can make someone appear weak, and many children and young people avoid them for fear of being seen in the same way
- some children or young people who experience bullying behaviour may start to believe it is their fault and begin to see themselves as a victim

Behaviour outside of school or involving phones

Section 89(5A) of the Education and Inspection Act 2006 gives headteachers a statutory power to regulate learners' behaviour in these circumstances 'to such extent as is reasonable'. Bullying behaviour may be an example of where headteachers use this power. Individual schools are best placed to make judgements about what is reasonable in their circumstances.

While schools can regulate certain conduct off school premises, such as bullying behaviour, the situation will be discussed and addressed with the learner and a suitable consequence for their actions will be implemented and reviewed.

School staff may request a learner reveal a message or show them other content on their phone for the purposes of establishing if bullying behaviour has occurred. Where the text or image is visible on the phone, staff can act on this. Where the school's behaviour policy expressly allows it, a member of staff may search through the phone themselves where the learner is reasonably suspected of involvement. Staff are advised never to search through a learner's phone without another appropriate staff member present. This is best done with the designated safeguarding lead or the ICT manager. They should prepare a written note stating:

- the date
- time
- who was present
- purpose of the search
- any evidence why it was necessary

It is vital that these matters are well covered in the school's anti-bullying and behaviour policy.

Embedding inclusivity and respect through the Curriculum for Wales

Embedding work in curriculum design that progressively addresses relationships, positive behaviour and resilience is more effective than one-off lessons.

The [Curriculum for Wales](#) framework provides every school in Wales with the opportunity to design and adopt their own curriculum. It encourages schools to build their own vision for their learners within the context of the four purposes and the learning defined at a national level.

The Health and Well-being Area of Learning and Experience provides a holistic structure for understanding health and well-being. The fundamental components of the area are physical health and development, mental health and emotional and social well-being.

Relationships and Sexuality Education (RSE) is a mandatory requirement within the Curriculum for Wales in maintained schools and aims to keep children and young people safe from harm. The RSE Code sets out learning at developmentally appropriate phases and includes learning on a range of issues such as healthy relationships, keeping safe, online and offline, and being confident to raise issues with responsible adults.

RSE aims to reduce all forms of bullying behaviour and discrimination, and learners are supported to develop an understanding of the social, emotional, physical and legal nature and impact of harmful behaviours, and awareness of laws in place to protect from different forms of discrimination, violence, abuse, neglect and harassment.

The 'Empowerment, Safety and Respect' strand of the RSE Code sets out the requirement for schools to support learners to develop empathy, kindness and compassion towards each other and empowering them with the confidence to draw upon available support if they are concerned about their own safety or that of others.

The Curriculum for Wales has been developed to be inclusive for all learners, with the [enabling learning section](#) highlighting the importance of the role of the enabling adult to:

- set expectations for learning by creating emotionally safe environments where learners can express and regulate their feelings and behaviours positively
- ensure learners can navigate uncertainty and change, supporting them through transitions and daily routines
- be attentive and responsive to learners' interests, preferences, and choices, encouraging decision-making and helping them understand that others may have different thoughts and feelings

By valuing each learner's communication, enabling adults foster confidence and recognise communication develops uniquely for every child, supporting emotional safety. They also strengthen the connection between the learner's home and wider community, embracing past and present experiences to build a sense of belonging, while promoting inclusivity and respect for identity within the diverse culture of Wales.

Tailoring interventions

Children and young people who display bullying behaviours by using insults may not always understand the hurt they have caused and may be repeating what they have heard at home or in the community. Sensitive restorative work and education can be effective in these cases. Group activities exploring why some words are unacceptable can be used along with meetings with parents who should be reminded about the values of the school. Effective engagement with parents in developing the values and school's anti-bullying strategy from the outset may also encourage learners and their families to adopt the shared values in the wider community.

When young people become adolescents, they are more likely to be influenced by their peers and therefore interventions should adopt a whole-school approach, addressing all learners within a school or education setting so the majority opinion is heard.

Targeted approaches

Schools should adopt and maintain a whole-school approach, to build a supportive school culture and shared values. Implementing this approach, including through coproduction with those with lived experience, can be instrumental in enabling and empowering learners to acquire and maintain the social skills that will allow them to manage their relationships with others and equip them to respond to bullying behaviour in an appropriate and if necessary, assertive way. This approach to bullying behaviour enables the issue to be introduced progressively in an appropriate way and not treated as a 'one-off' lesson. Across the curriculum, use of literature, audio visual material, drama, music, debates and visits into and out of school can help develop learners' understanding.

Targeted initiatives provide an opportunity to reinforce a positive and inclusive school culture. This can include awareness days, workshops, sign-posting and drop-in sessions as well as involving the wider neighbourhood and using a variety of organisations to educate learners on equality and diversity.

Schools should not be restricted to embarking on targeted initiatives only within dates set aside for planned prevention activities. In fact, limiting discussion of equality or discrimination issues solely to publicised or scheduled events misses numerous opportunities for 'teachable moments' such as what is in the news.

Behaviour expectations and dealing with incidents of misconduct on and off school premises

Setting out behaviour expectations

Effective policies on school behaviour, anti-bullying and discipline should clearly set out expectations for positive behaviour of learners off the school site. This includes behaviour on activities arranged by the school such as:

- work experience placements
- educational visits and sporting events
- behaviour on the way to and from school
- behaviour online
- behaviour when wearing school uniform (if any) in a public place

What schools should consider when dealing with misconduct

Schools must act reasonably both in relation to expectations of learner behaviour and in relation to any measures determined for regulating behaviour by learners when off the school site and not under the lawful control or charge of a school staff member. Schools should decide what to consider in deciding whether a rule or sanction in a particular case is reasonable. Challenging bullying behaviour may be an example of when schools implement this provision. A school could sensibly take account of the following factors (which may not all apply to every incident):

- the severity of the misbehaviour
- whether the learner or learners in question was or were wearing the school uniform or otherwise readily identifiable as a member or members of the school
- the extent to which the behaviour in question would have repercussions for the orderly running of the school and/or might pose a threat to another learner or member of staff (for example bullying behaviour towards another learner or insulting a member of the staff)
- whether the misbehaviour in question was on the way to or from school (schools in collaboration with their local authority should consider whether to impose sanctions under the travel behaviour code or school behaviour policy when addressing misconduct on the journey to and from school)
- whether the misbehaviour in question was outside the school gates or otherwise in close proximity to the school
- whether the misbehaviour was while the learner was on work experience, taking part in a further education course as part of a school programme or

participating in a sports event with another school (when the learner might be expected to act as an ambassador for the school)

- whether the learner was or learners were truanting
- whether the incidents occurred online during school hours or outside school hours
- the extent to which the reputation of the school has been affected

How schools should deal with misconduct

There is a strong case for educating the learner in the first instance. Understanding the reasons behind behaviour should be the first step, with more formal restrictions the last resort, after restorative approaches have been exhausted. This also would apply if the learner has been abusing other people, including members of the public, while travelling on the way to or from school. However, disciplining a learner for abusing somebody who had no connection with the school at a weekend would be more challenging. This is not of course to say that schools should take no interest. Liaison between the school, parents and those in the local authority and wider community responsible for tackling antisocial and bullying behaviour may be particularly relevant in this context.

Schools may find it helpful to relate whatever factors they decide to use to a set of overall objectives that make clear why a policy for regulating behaviour, including strategies for challenging bullying behaviour and promoting respectful relations off school premises, is being applied. These objectives might be to:

- maintain good order on transport and while walking or cycling to and from school, educational visits or other placements such as work experience or college courses
- secure behaviour which does not threaten the health or safety of learners, staff or members of the public
- provide reassurance to learners who may feel threatened or intimidated by the behaviour of a small minority of their peers or are worried about 'stranger danger'
- provide reassurance to members of the public about school care and control over learners and thus protect the reputation of the school
- provide protection to individual staff from harmful conduct by learners of the school when not on the school site.

Many extended school activities take place off school premises. Behaviour during such activities may be dealt with in the same way as for any other on-site activity. It would be logical to deal with behaviour during off-site extended school activities which are not supervised by school staff in the same way as behaviour during further education, college or work experience placements.

How a school will know a strategy is effective

When a strategy is introduced a cycle of reflective practice begins measuring the situation at that point providing a baseline against which progress can be benchmarked. Schools should conduct a self-evaluation exercise seeking feedback from both staff and learners to measure the extent of bullying present. Surveys provide a useful method of collecting this information.

To determine how effective a school strategy is, it is important to consult with all those involved in implementing the strategy. Learners need to be actively involved in developing, implementing, and reviewing activity. In some schools, staff may believe it works well, while most learners may say the opposite. For strategies to be most effective there needs to be a consensus that the strategy is working. This involves ongoing dialogue between staff and learners. A key question, which should be asked continually is 'Are there ways in which it could be improved?' Some approaches might work better in some circumstances. Good ideas may not be working well because small, but significant, changes are needed.

An example of this is a school, which had gone to considerable trouble to train peer supporters and then found that not a single report was received for 2 terms. It found that the room allocated for children to meet and talk to the peer supporters, was nicknamed 'the fishbowl' by learners because it made them highly visible due to glass panels. They stayed away. Not because the peer support offered was inadequate but simply because the facility provided was unsuitable.

The importance of monitoring incidents of bullying behaviour

Monitoring incidents of bullying behaviour enables a school to identify patterns of behaviour and the extent of bullying behaviour. This in turn enables them to take steps to challenge unacceptable behaviour and bullying behaviour. Schools which use monitoring processes are best placed to be able to modify their anti-bullying policies effectively to respond to specific trends and issues.

Data can be used to evidence progress as part of self-evaluation and the school development plan, helping schools to:

- understand the current situation and show where to focus efforts
- achieve the equality goals they have set as a school
- measure and demonstrate success
- meet their general and specific obligations under the Public Sector Equality Duty

Further information can be found in the 'Evaluation and accountability' section.

Why anti-bullying strategies may not reduce bullying

Schools can find that the most challenging aspect of reducing bullying behaviour is to obtain a good resolution to cases. If learners come forward only to find that interventions either make no difference, or worsen the situation, trust is lost. Evaluations frequently reveal that this is the weakest point in a school's strategy.

Schools who report they have no bullying behaviour may not have the trust of their learners. Their reporting mechanisms or responses may also be ineffective. This may mean that learners do not feel safe raising their concerns, or that parents have removed the learner from school in response to bullying behaviour. Schools reporting zero cases of bullying behaviour may be challenged through the inspection process to clarify what mechanisms the school employs to ensure learner well-being and inclusivity.

If children and young people lack confidence that they will achieve a good outcome when they report what is happening to them, they tend to stay silent. The Children's Commissioner for Wales found that 'trust' was a recurring theme raised by children. Having a trusted person to talk to emerged as a key pathway to address bullying behaviour.

Responding when bullying behaviour occurs

Schools must comply with their legal duty to safeguard and promote the welfare of learners and any other legal duties. Headteachers and school governing bodies should ensure all teachers and administrative staff, are aware of their school's anti-bullying policy and the procedures to follow if a learner reports being bullied. In addition, there should also be clear communication with learners and parents promoting transparency in relation to the handling of bullying behaviour.

Staff should be mindful that a learner may approach any member of staff they trust. Staff training and regular updates will increase their readiness and confidence to notice and respond when issues of bullying behaviour may be present. School procedures outlining the steps to take for addressing bullying behaviour should be understood by all staff and applied in a consistent and fair manner. This will help to ensure that when a learner reports an issue of bullying behaviour to staff, irrespective of which staff member the learner approaches, the same procedure is followed.

Successful strategies provide a consistent framework with options to suit the situation. Bullying is complex behaviour, and the response should be appropriate, while also following standardised framework guidelines. A school's anti-bullying strategy should be child-centred and not lose sight of the needs of the learner, irrespective of whether they are the child or young person experiencing the bullying behaviour, displaying the bullying behaviour or a bystander. If the response is too

generic, heavy handed or lacks sincerity, it can have the opposite effect from that intended.

Effective schools use each incident as a learning opportunity. The school's role is to nurture and support learners to understand they are in the process of learning to be informed citizens of the future.

Undertaking work with all parties

Alongside the support provided to children and young people who experience bullying behaviour, schools should also acknowledge that those who display bullying behaviour need and should receive help, support and opportunities to change their behaviour as part of a restorative approach. Bullying behaviour can be a sign of some bigger problem at school, home or elsewhere in a child or young person's life. Domestic abuse, domestic violence, punitive parenting, neglect, abuse, bereavement or parents parting can be revealed when working with learners who display bullying behaviours. Staff should be appropriately prepared for such disclosures as part of broader training, such as safeguarding. Schools with an open culture and good safeguarding protocols will be responsive to all parties involved in bullying behaviour.

Schools should also support bystanders of bullying behaviour. Children and young people who witness bullying behaviour and do nothing to help or stop the situation may feel bad or guilty about it later. Bystanders who laugh or join in the bullying behaviour are at risk of becoming bullies themselves. Schools should ensure children and young people who are bystanders to bullying behaviour understand that they have the power to challenge the bullying behaviour, either by intervening – if they feel safe to do so or by reporting it immediately to a member of staff or trusted adult.

Educating learners by helping them to develop resilience by practicing the problem-solving and assertiveness skills they need to challenge unacceptable behaviour, stand up for themselves and for their peers and feel safe is important.

Routes to report

Learners may disclose an incident or incidence of bullying behaviour in a variety of ways and to an individual they view as a trusted adult. Schools should also offer a range of ways for learners to report bullying behaviour. These can include:

- trained peer supporters or 'buddies'
- a quiet and private space to talk
- anti-bullying pastoral leads and staff available at key times
- school nurses or counsellors
- 'I wish my teacher knew' cards
- feedback boxes

Effective listening

Effective listening can be used along with teaching relationship skills to those who display bullying behaviours. They should be guided to recognise and handle their difficult feelings and to learn positive communication skills.

Children and young people who experience bullying behaviour tend to feel powerless. One of the first steps when responding to incidents is to work to restore their capacity to make choices for themselves. Using effective listening techniques, staff (or a peer supporter where these are used) can help the child or young person to feel they are doing something about the problem. Acknowledge calmly the anger or distress of the child or young person speaking. If they need time to process their thoughts or articulate the story, try not to rush them. Learners must not be placed under any pressure or expectation to excuse bullying behaviour. Staff should be mindful that it may have required considerable courage to come and report what is happening. Learners should be thanked for reporting the problem. Learners should also be made aware of how their concerns will be taken forward. This will help to reassure them that their concerns are being taken seriously.

Consider the setting

Staff should consider the environment where discussions with learners about bullying behaviour take place. Ensuring the setting is neutral and offers suitable levels of privacy can make the difference between a learner engaging in discussion or not. Staff should sit at the same level as the learner reporting their experience of bullying behaviour. Placing chairs at a slight angle rather than directly opposite each other can also help reduce any conscious or unconscious sense of confrontation or opposition. Ensure privacy to avoid other learners overhearing what is said or seeing a meeting taking place, but for safeguarding best practice, it should be possible for other staff to observe the meeting.

Saving evidence

Learners who are bullied should be encouraged, where possible, to keep evidence of the activity. Evidence may be threats or images sent on or offline by messaging, conversations, notes or images, damaged clothing or other belongings, online conversations or notes. Bystanders may also be able to provide witness statements or additional evidence. Dates and times when things happened should be noted. Screenshots can be saved as online evidence.

Dealing with bullying behaviour and its effects

Bullying behaviour damages healthy self-esteem, replacing positive beliefs about oneself with beliefs linked to shame, disgust, criticism, incapacity, powerlessness and helplessness. When deciding on next steps to increase the self-efficacy of the

learner who reports being bullied, staff should try to include decisions made by the learner themselves where appropriate. Staff may wish to offer some choices unless, in doing so, there is a risk of evidence of significant harm. In that case staff should apply their school safeguarding procedures. Choices offered to the child or young person may include:

- How the incident could be handled?
- Whether changes to the learner's current journey to and from school should be considered in more detail?
- Whether the learner would like help from peers, a trusted adult, or group activity such as a club or lunch time activity?

Interventions may be at a class level, year group level or only with the individuals involved in the bullying behaviour incident.

There are a variety of intervention methods schools may choose to use.

Examples of these include the following.

Mediation

This involves helping the child or young person experiencing the bullying behaviour and the child or young person displaying the behaviour talk about the issue and agree on a solution.

Restorative approaches

Built on values, which separate the person from the behaviour. They promote accountability and seek to repair any harm caused in a situation.

Building resilience

Strengthening learners' ability to effectively cope, adjust or recover from being bullied or facing other sources of trauma, stress or adversity. Equipping learners with a solid foundation or emotional resilience by ensuring that they feel accepted.

Peer support

Peer support is about children and young people feeling accepted and included by other learners. It can help individuals feel like they belong in a school and can be an important factor in reducing bullying behaviour and conflict. It can be encouraged in schools in both informal and formal ways.

School sanctions

Schools can use disciplinary sanctions, as set out in their school policies to address bullying behaviour. The consequences of bullying behaviour reflect the seriousness of the incident so that others see that bullying behaviour is unacceptable.

There are various programmes schools can adopt to address bullying behaviour. It is for individual schools to determine the most effective way to address bullying

behaviour and implement anti-bullying policies in their school setting. This includes which, if any, programmes they choose to employ to support this provision.

There are frequent learning opportunities for the whole class or year group, which can be implemented without mentioning the name of the person who reported it. This protects against retaliation.

Interventions should consider the impact on individual learners and should not include removing a targeted learner from school. While this may safeguard the learner from further immediate harm, it could damage their self-esteem and emotional well-being and empower the child or young person displaying the bullying behaviour. It also sends a message that the bullying behaviour is acceptable, disrupts the child or young person's education and may make it more difficult for them to reintegrate. Therefore, it is not a suitable strategy for addressing the root cause of the issue or provide real solution.

If deemed appropriate, the school could provide separate on-site provision (for either learner) to provide respite for the child or young person affected by the bullying behaviour. Schools should make every effort to ensure that a bullied learner is able to attend school and that they feel safe doing so.

Key considerations when the intervention appears not to be working

It is not productive to continue using an intervention to address a case of bullying behaviour if the approach has failed to work. If an intervention is not working as intended, alternative approaches should be tried. Schools must not consider the issue resolved on the grounds that the intervention is completed, if the outcome is not successful.

If a case is persistent or the same child or young person is consistently reported for displaying bullying behaviour towards others, a different response is required. Some approaches may not be suitable for certain cases. For example, where there is an imbalance of power so great that the child or young person experiencing the bullying behaviour is afraid of the child or young person displaying the bullying behaviour, restorative approaches may be unwise until sometime later when work has been undertaken to address the power balance.

Resistant cases can cause immense distress to learners and their parents. Where a school's response is that it has followed its anti-bullying policy, there may be stalemate. The school insists they are addressing the matter, but the child or young person and their parents are not seeing any improvement in the situation.

Difficult behaviour does not always improve in a steady progression. It might improve for a time and then slip back. This may not indicate the approach is not working but

that it should be continued, reinforced or slightly altered. If it is not working at all, a new plan should be made.

Where cases are resistant to resolution, regular reviews and ongoing communication between all parties is vital to ensure interventions are working properly.

Responses can include work for the family to do at home. Schools may wish to remind parents that they should support the school's values. If the source of the prejudice-related behaviour is in the home or community, this should be acknowledged and help sought in the local area.

Responding to harmful attitudes

Prejudice-related bullying can, in some cases, escalate if harmful attitudes go unchallenged, with some learners becoming more vulnerable to extreme views. The UK government's [Prevent duty](#) is a legal requirement for educational institutions to safeguard learners from being drawn into terrorism or extremism by challenging radical ideologies.

As an early intervention programme, Prevent is about stopping people from becoming terrorists or supporting terrorism. It sits alongside long-established safeguarding duties on professionals to protect people from a range of other harms, such as substance abuse, involvement in gangs, and physical and sexual exploitation. Prevent seeks to intervene early and ensure that people who are susceptible to radicalisation to terrorism are supported as they would be under safeguarding processes.

The right of parents and learners to make a complaint

Having reported an issue regarding bullying behaviour to the school, if a learner or their parent does not feel that the school has taken it seriously or has not addressed their concern to a satisfactory standard, they can make a formal complaint.

Under Section 29 of the Education Act 2002, school governors are required to have and publicise a complaints procedure ensuring anyone with an interest in the school can raise a complaint, confident it will be considered properly and without delay.

A school complaints policy must be made available on request from the school or school governing body. The policy must explain the process for raising a complaint to enable the complainant to understand how the school governing body will deal with the issue.

In accordance with the principles of the UNCRC, all children and young people should be listened to and treated with respect. Schools should ensure a learner making a complaint has fully understood what is on the complaint form and any decisions or actions which may follow on from this.

Information should be recorded to enable the school to:

- be clear about the nature of the complaint
- keep the complainant informed of the progress of their complaint
- make reasonable adjustments to timescales if the complaint is complex
- keep an accurate record of the complaint and process followed
- monitor the progress of a complaint
- document what has been done and what needs to be done
- provide evidence that the complaint was considered properly
- record information for future reference given that bullying behaviour cases can recur so a full picture should be available
- identify trends or recurring themes in complaints cases, to inform wider school improvement processes
- compile reports to school governors and others on complaints

All complaints must be managed fairly, openly and without bias. Schools should investigate the concerns raised and make a decision quickly.

Evaluation and accountability

Reporting, recording, and monitoring

Where schools collect data about bullying behaviour incidents, most of this data would be personal data as defined under data protection legislation such as the EU General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018 (DPA).

Schools should have in place mechanisms for reporting and recording bullying behaviour which are clearly communicated to the whole-school community. The information schools record and monitor should directly relate to its definition of bullying behaviour and broader provisions outlined in their anti-bullying strategy and policy. Local authorities should work with schools and other local authorities to adopt a standard way of recording and reporting bullying behaviour.

Effective record maintenance enables schools to:

- review an incident
- check whether there are other reports concerning the learners involved
- use what is recorded to plan in a holistic and informed way

Monitoring incidents of bullying behaviour enables a school to identify patterns of behaviour and the extent of bullying behaviour. Schools should then take pro-active

steps to challenge it, provide support to affected learners and ensure that the issue can be resolved.

By law all schools are required to have in place a Data Protection Officer (DPO) to ensure that the school is aware of and able to meet their obligations under GDPR and DPA 2018. The Welsh Government and the Information Commissioner's Office expect schools to work with their DPO to ensure that all personal data is processed lawfully and with appropriate protection for individual's rights.

Schools have broader responsibilities regarding the collection and monitoring of data, including data relating to bullying behaviour. The lawful basis for processing data is set out in Article 6 GDPR (lawfulness of processing) and Article 9 GDPR (processing of special categories of personal data). Schools must determine a legal basis before processing any information about bullying behaviour. Schools will also need to ensure that they are not collecting more data than they need and have a clear retention schedule for the information. Processing of information for anti-bullying measures will need to be reflected within each school's fair processing information. Data Protection Impact Assessments (DPIA) will be required by individual schools in determining what data they need to collect to ensure that it is proportionate and that any appropriate steps that may be necessary to mitigate risks to individual's rights are taken.

Since April 2011, all public bodies, including schools and local authorities, have obligations under the Public Sector Equality Duty. In Wales, there are specific duties on public bodies to:

- develop and publish equality objectives and a Strategic Equality Plan
- collect, analyse and publish information about the progress they are making in achieving their obligations under the Public Sector Equality Duty

Where appropriate by law, schools should record all incidents of bullying behaviour outlining the specific types of bullying behaviour, including bullying behaviour around the Protected Characteristics. Schools should regularly monitor processes and the outcome of each recorded incident. This should include whether a formal complaint has been made in response to the school's approach to a bullying behaviour incident, or if a parent has removed their child from school because of bullying behaviour. This will enable schools to modify their anti-bullying policies to respond to specific trends and emerging issues in a swift and effective manner. Schools are likely to find this helpful in the context of their Public Sector Equality Duty under the Equality Act 2010. This information could also be used by schools when reviewing their equality objectives and monitoring the impact of their anti-bullying policies.

It is for individual schools to determine what data and information they collect in the context of the specific issues within their school and in compliance with data protection law. This should be done by:

- implementing an ongoing cycle of school-level data recording, monitoring and analysis of anti-bullying information
- using school level anti-bullying data to identify priority areas for implementing whole school improvement
- taking action to make those improvements, ensuring the cycle of improvement continues
- analysing data as part of self-evaluation

Estyn highlights that, historically, self-evaluation has been the weakest area in school inspections. All schools have areas on which they can improve. Self-evaluation and improvement processes underpinned by an open and honest collaborative culture should be an integral and ongoing feature of the work in all schools, regardless of current performance or situation. This is a constructive process and should be embedded into the culture and embraced by staff to improve for the future.

Through regular evaluation schools will be responsive to the trends in the school and community. It will be easier to be aware of improvements needed or the changes in procedures required if schools are in touch with changes in context.

Definitions of terms used in this document

Additional Learning Needs (ALN)

ALN is a learning difficulty or disability (whether the learning difficulty arises from a medical condition or otherwise), which calls for additional learning provision (Section 2 Additional Learning Needs and Education Tribunal (Wales) Act 2018).

Additional Learning Provision (ALP)

ALP refers to an educational or training provision that is additional to, or different from, that made generally for others of the same age in:

- a) mainstream maintained schools in Wales
- b) mainstream institutions in the further education sector in Wales
- c) places in Wales at which nursery education is provided.

ALP for a child aged under 3 means educational provision of any kind (Section 3 Additional Learning Needs and Education Tribunal (Wales) Act 2018).

Adverse Childhood Experiences (ACEs)

ACEs are stressful experiences occurring during childhood which:

- can directly harm a child (for example, sexual or physical abuse)

- affect the environment in which they live (for example, growing up in a household with domestic violence)

(Bellis et al 2016)

Research from Public Health Wales focuses on 10 ACEs that occur in the household or family environment and show the link between ACEs and risk of poor health and social outcomes across the life-course where there are no protective factors, or accessible support. Experience of ACEs, particularly multiple ACEs, is associated with maladaptive behaviours, including the adoption of health harming and anti-social behaviours. There are a range of other adversities that children and young people can experience; some of which are traumatic. These include racism, discrimination, structural inequalities and wider socio-economic factors.

Anti-racism

Anti-racism means identifying and eradicating the systems, structures and processes that produce radically differential outcomes for ethnic minority groups. It involves acknowledging that even when we do not regard ourselves as ‘racist’ we can, by doing nothing, be complicit in allowing racism to continue. It is not about “fixing” ethnic minority people or communities, but rather about fixing systems that have not benefited and at times even damaged ethnic minority people. It is about working with the considerable strengths and leadership of ethnic minority people and using their lived experiences in how we, collectively, shape and deliver. It is about making a positive and lasting difference. ([Anti-racist Wales Action Plan](#)).

Antisemitism

Antisemitism is a certain perception of Jews, which may be expressed as hatred toward Jews. Rhetorical and physical manifestations of antisemitism are directed toward Jewish or non Jewish individuals and/or their property, toward Jewish community institutions and religious facilities.

Asylum seeker

An asylum seeker is a person fleeing persecution in their homeland, has arrived in another country, made themselves known to the authorities and has exercised their legal right to apply for asylum. These individuals will be awaiting the outcome of their asylum claim.

Bystander

A bystander is a person who is present, whether on or offline, at an event or incident of bullying behaviour but does not take part or intervene.

Care-experienced

Care-experienced children and young people are those who:

- have previously been looked after by the local authority (for example, children who have been adopted or are in a Special Guardianship Order arrangement)
- are currently being looked after by a local authority (for example, children in foster or residential care).

Children and young people

Children and young people refers to those under 18 years of age, in line with the definition of 'children' within the Children Act 1989.

Coercive and controlling behaviour

Coercive and controlling behaviour refers to cruel behaviours a person uses to hurt, control or scare someone else (the victim). This is a type of domestic abuse. The abuser puts the victim down, uses violence and/or threats, or scares and frightens the victim. They do this so they can control the victim and make them do things they don't want to. This behaviour often happens with other abusive behaviours, including physical, sexual and financial abuse and can also occur online.

Direct discrimination

Direct discrimination refers to different treatment of a person compared with another person because of a protected characteristic. Circumstances must be similar enough to the other person being treated better for a valid comparison to be made. It includes discrimination because someone is perceived to have a Protected Characteristic or where someone is discriminated against because they are associated with someone else who has a Protected Characteristic.

Disability and disabled person

A person has a disability if

- a) the person has a physical or mental impairment; and
- b) the impairment has a substantial and long-term adverse effect on the person's ability to carry out normal day-to-day activities

A reference to a disabled person is a reference to a person who has a disability. (Section 6 of the Equality Act 2010).

Elective home education

Elective home education (EHE) is a term used to describe when parents educate their children at home instead of sending them to school.

Estyn

Estyn is the independent inspectorate of education and training in Wales. It provides public accountability to service users on the quality and standards of education and training in Wales through inspection.

The key reasons for inspection are to:

- evaluate the quality and standards of education and training.
- identify strengths and areas for improvement.
- support providers in their journey towards excellence.
- inform parents and the wider community about the quality of education provided.

Estyn informs the development of national policy by Welsh Government and Medr by offering evidence-based advice gathered through inspection activity and thematic reviews. Estyn also assists in building capacity for improvement of the education and training system in Wales through their regular reports and sharing of case studies and best practice.

Equity

Equity refers to fair and impartial treatment, including equal treatment or differential treatment to redress imbalances in rights, beliefs, language, obligations and opportunities.

Gender

Gender is a term used to refer to whether someone identifies as female, male or non-binary. Gender can also refer to the social and cultural norms and differences that different societies have about how people behave, look or dress. People often find an important sense of identity in these, but they can also perpetuate discrimination, inequalities and harms.

Gender non-conforming

Gender non-conforming describes a person whose behaviour, appearance or self-expression does not conform to prevailing cultural and social expectations about gender.

Harassment

Harassment is defined by section 26 of the Equality Act 2010. Harassment occurs when a person engages in unwanted conduct related to a Protected Characteristic, and the conduct has either the purpose or effect of violating the other person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment can also take the form of unwanted sexual behaviour or behaviour related to gender reassignment.

Hate crime

A hate crime can be any crime perceived by the victim or others to be motivated by hostility or prejudice of the victim's perceived race, religion, sexual orientation,

transgender identity and/or disability. A hate crime can include (but is not limited to) assault, damage to property, threats or intimidation, harassment, online attacks and verbal abuse.

Inclusive

Inclusive refers to the process of strengthening the capacity of the education system to reach out to all learners. An inclusive school recognises the importance of diversity and difference across a range of identities and that this diversity is a source of strength and is foundational to a cohesive, fair and equitable society.

Intersectionality

Intersectionality is related to the way in which different types of discrimination (that is unfair treatment because of a person's Protected Characteristics) are connected to and affect each other.

Anti-Muslim hostility (also known as Islamophobia)

Although this is not a formal agreed definition, Anti-Muslim hostility refers to the prejudicial stereotyping of Muslims. A form of prejudice targeted at those perceived to be Muslim or Islam in general. This hostility can be a form of religious hate crime or discrimination without a crime being committed.

LGBTQ+

LGBTQ+ stands for lesbian, gay, bisexual(bi), transgender (trans), queer or questioning. The + refers to other letters that can be added to represent other identities, including non-binary.

Migrant

Migrant is anyone who was born outside the United Kingdom but has come to the UK for work, study or other reasons.

Non-binary

A non-binary person is someone whose gender lies outside the traditional male or female binary idea of gender.

Online bullying

Online bullying describes all bullying behaviour via technology, also known as cyberbullying

Otherness

Otherness refers to being or feeling different in appearance or character from what is familiar, expected, or generally accepted

People seeking sanctuary

People seeking sanctuary is an umbrella term referring to refugees or asylum seekers from any background. This is to combat the dehumanising rhetoric which can occur when referring to people by the immigration status which they have been assigned.

Race

Race includes colour, nationality and ethnic or national origins (Section 9 Equality Act 2010).

Refugee

A refugee is a person who owing to a well-founded fear of being persecuted for reasons of race, religion, nationality, membership of a particular social group, or political opinion, is outside the country of his nationality, and is unable to or, owing to such fear, is unwilling to avail himself of the protection of that country.

Restorative approach

A restorative approach is a way of addressing conflict with a focus on repairing the harm that has been done. It includes all parties involved.

Personal resilience

Personal resilience is the ability to adapt, cope, and bounce back from adversity, stress, trauma, or significant challenges, rather than being overwhelmed by them, involving learnable behaviours and mindset shifts to maintain well-being and grow from difficult experiences. It's not about avoiding hardship but about navigating it effectively by learning from setbacks, staying positive, maintaining connections, and developing coping strategies.

Sex

Sex is attributed to a person on the basis of primary sex characteristics (genitalia) and reproductive functions (Section 11 of the Equality Act 2010).

Sexual orientation

Sexual orientation means a person's sexual orientation towards persons of the same sex, persons of the opposite sex or persons of either sex (Section 12 of the Equality Act 2010). People might use the terms heterosexual, gay, bisexual, bi, lesbian or straight to describe their sexual orientation.

School

Means:

(a) a community, foundation or voluntary school,

- (b) a community or foundation special school,
- (c) a maintained nursery school, and
- (d) a pupil referral unit

Transgender or Trans

Transgender or trans is an umbrella term used to describe people whose gender is not the same as, or does not sit comfortably with, the sex in which they were registered at birth. Some non-binary people regard themselves as falling under the trans umbrella, but not all.

Section 7 of the Equality Act 2010 protects those with the protected characteristic of gender reassignment if the person is proposing to undergo, is undergoing or has undergone a process (or part of a process) for the purpose of reassigning the person's sex by changing physiological or other attributes of sex.

Trauma

Trauma refers to any experience that is unpleasant and causes, or has the potential to cause, distress and/or anxiety. Such experiences can overwhelm our ability to cope, and result in lasting negative impacts. Trauma can stem from a single event or, or an ongoing series of events and experiences, happening over a period of time.

Trauma-informed

Trauma-informed is an approach which acknowledges anybody could have experienced trauma in their lives and seeks to avoid retraumatising behaviours and interactions. It recognises that everyone has a role in facilitating opportunities and life chances for people affected by trauma and adversity. It is an approach where a person, organisation, programme or system realises the widespread impact of trauma and understands potential paths for healing and overcoming adversity and trauma as an individual or with the support of others, including communities and services.

Further help and advice

Bullies out

[Anti-bullying charity](#) based in Wales who work with individuals, schools and colleges, as well as with youth and community settings.

The charity offers an [online e-mentor service](#).

Anti-bullying Alliance

[A coalition of organisations and individuals](#) who provide information for schools, parents, carers, children and young people on all aspects of bullying behaviour.

Kidscape

[Anti-bullying charity](#) who provide interventions with children and work with schools and the community.

The Diana Award

An [online resource and support centre](#) for young people, parents/carers and educators to access information.

Helplines and support services

General

Samaritans

A [registered charity](#) aimed at providing emotional support to anyone in emotional distress through its free to call telephone helpline, email, live chat, and other services.

Rethink

An [advice and information](#) service providing practical advice on a wide range of topics like access to mental health and social care, mental health treatments, and laws, and advice for carers .

Mencap

The [Wales Learning Disability Helpline](#) offers information and advice on the rights of people with a learning disability.

Meic

A [helpline service](#) providing information, advice and advocacy for children and young people up to the age of 25 in Wales.

Childline

Childline offer a confidential and available any time, day or night [service](#) where you can talk about anything.

Kooth

A [digital mental health support service](#) providing children and young people easy access to an online community of peers and a team of experienced counsellors.

CALL

[Mental health helpline](#) for Wales offering emotional support information and literature on mental health and related matters

Parents and carers

Family Lives

A confidential [helpline service](#) for families offering emotional support, information, advice and guidance on any aspect of parenting and family life. The helpline can be contacted on 0808 800 2222.

Parent Zone

Offers [services and resources](#) to parents and families to improve outcomes for children in the digital world.

Young Minds

A [helpline](#) for parents and carers providing information, advice and support with your child or young person's mental health or well-being. The helpline can be contacted on 0808 802 5544.

Schools and professionals

Education Workforce Council

The Education Workforce Council are the independent, professional regulator for the education workforce in Wales. They have published specific information on the [Code](#)

[of Professional Conduct and Practice](#), setting out standards for teachers, leaders, teaching assistants, and higher level teaching assistants.

Professionals Online Safety Helpline (POSH)

Operated by the [UK Safer Internet Centre](#) this helpline is solely dedicated to supporting all members of the community working with or for children with any online safety issues. The helpline can be contacted on 0344 381 4772 or [email](#).

Keeping safe online

The [Keeping Safe Online area](#) in Hwb allows you to report harmful content or activity that you have experienced or witnessed online.

ACE Hub Wales TrACE Toolkit

The [ACE Hub Wales Trauma and ACE \(TrACE\) Informed Organisations Toolkit](#) provides a practical guide to support organisations on their TrACE journey. It is a key resource for implementing the TrACE Framework effectively.

Advice and support networks

General

Internet Watch Foundation

The Internet Watch Foundation's [website](#) allows you to report suspected online child sexual abuse images or videos.

Wales Hate Support Centre (Victim Support)

The Welsh Government-funded Wales Hate Support Centre's [website](#) allows you to report hate crime and get tailored support. This includes a dedicated service for children and young people.

Child Exploitation and Online Protection

The Child Exploitation and Online Protection [website](#) allows you to report suspected child sexual abuse, exploitation or online sexual abuse.

NSPCC

The NSPCC's [helpline](#) allows you to report child abuse and neglect. You can also get advice if you are worried about a child and not sure what to do.

Adoption UK Cymru

Adoption UK Cymru provides support and services across Wales and works in collaboration with their partners in the National Adoption Service. [Adoption UK](#) has information for schools on supporting previously looked-after children to thrive in school.

Children and young people

Mental Health Matters

A [registered charity](#) providing support and counselling services to promote well-being.

Heads Above The Waves

A not-for-profit [organisation](#) that raises awareness and offers advice for depression and self-harm in young people.

Voices From Care Cymru

[Voices From Care Cymru](#) is a national organisation dedicated to upholding the rights and welfare of care-experienced children and young people.

Schools

Educational Action Challenging Homophobia (EACH)

A [charity](#) offering a confidential, homophobic, biphobic or transphobic bullying reporting service for children and young people aged up to 18 years of age. They also offer training and consultancy services.

Show Racism the Red Card

An [anti-racism charity](#) offering educational training, workshops, resources and activities, designed to educate young people and adults about the causes and the consequences of racism.

International Holocaust Remembrance Alliance

An [intergovernmental organisation](#) working to help people better remember, understand, and learn about the Holocaust and genocide of the Roma so that we can build a world without genocide.

Gov.uk

Through gov.uk, you can access statistics on [hate crimes](#) and access [training courses](#) on the Prevent duty.

Adverse Childhood Experiences (ACE) Hub Wales

Since 2017, ACE Hub Wales's [mission](#) has been to enable and support organisations and communities in making changes that make Wales a world leader in preventing, mitigating and tackling ACEs and trauma and their significant impact. Their aim is to challenge and transform ways of working and create a societal shift to break the long-term cycle of ACEs, adversity and trauma. Funded by Welsh Government and hosted within Public Health Wales, ACE Hub Wales have worked with the public sector and beyond to ensure that ACEs and their potential impacts across the life course are understood across Wales.

Trauma-Informed Wales Framework

The [Framework](#) supports a coherent, consistent approach to developing and implementing trauma-informed practice across Wales, providing the best possible support to those who need it most. Published in 2022, it was co-produced by people and organisations from across Wales and supported by the Welsh government. The implementation of the Framework is being implemented by the two lead organisations, ACE Hub Wales and Traumatic Stress Wales supported by an Implementation Steering Group [Trauma-Informed Wales](#):

Wales Without Violence Framework

The [Wales Without Violence is a strategic framework](#) outlines the key elements needed to successfully develop primary prevention and early intervention strategies to end violence among children and young people through a public health, whole-system approach. The 9 strategies are the core of this Framework and include examples of evidence informed interventions, as well as system change measures to prevent violence using a trauma-informed approach.

Public Health Wales – What Works Toolkit

The [toolkit](#) is designed to help schools implement evidence-based interventions for improving emotional and mental well-being among learners and school staff. It provides a summary of the effectiveness of various interventions. Details of the interventions are available on PHW's website and Hwb. Department of Quantitative Social Science, University of London

School Health Research Network (SHRN)

Interactive [dashboard](#) presenting updated survey results on the health and well-being of secondary school-aged children in Wales.

Neurodivergence Wales

Provides a range of [resources](#) for schools and colleges, which aim to raise understanding and awareness of neurodiversity.

The National Autistic Society

Published a short [guide to bullying](#) behaviour and lists some ways in which teachers can help.

Other

Beat Helpline

Offers a [service](#) which provides confidential advice and support to individuals affected by eating disorders, but also on body image and advice and support for pupils and teachers.

The Children's Society

A [report](#) titled The Good Childhood Report 2024, shows the latest trends in children's well-being, and shares research which seeks to understand how young people feel about different aspects of their lives.

The Children's Commissioner for Wales

Offers a [service](#) which shares advice and assistance to young people or those who care for them if they feel that a child has been treated unfairly.

A [report](#) titled 'Sam's Story' is the culmination of a large-scale consultation with over 2,000 children and young people and nearly 300 professionals' views about contemporary experiences of bullying behaviour in Wales.

Children in Wales

A national [umbrella](#) membership body for organisations and individuals who work with children, young people and their families in Wales.

UNICEF

Works to protect the [rights of every child](#) with the UN Convention on the Rights of the Child (UNCRC) especially the most disadvantaged and those hardest to reach.

Just Like Us

A published [report](#) titled Growing Up LGBT+: the impact of school, home and coronavirus on LGBT+ young people which sheds light on the disproportionate challenges they face and ways we can work together to improve the lives of LGBT+ young people across the UK.

Lucy Faithfull Foundation

Offers a [helpline](#) and [advice](#) for teenagers worried about sexual behaviour, including guidance on healthy relationships and boundaries.

National Education Union (NEU)

Provides a [toolkit](#) with resources and information to help schools understand the impact of trauma, support affected students, and create inclusive, safe learning environments.

Welsh Government

The Welsh Government has published the following:

- [Keeping learners safe guidance](#) which includes safeguarding responsibilities for schools and education settings
- [guidance and practical support](#) for governing bodies in preventing and responding to incidents of bullying in schools
- [guidance and practical support](#) for parents and carers to support their child deal with bullying
- [Keeping Safe Online online bullying](#) classroom resources, information and advice for schools, learners and their families
- [the Behaviour toolkit](#) to support positive behaviour in schools through relationships, the environment, teaching and learner-focused strategies
- [Mental health and well-being strategy](#) to support anti-bullying and promote mental health and well-being in education
- [Peer-on-peer sexual harassment in education settings action plan](#) to prevent and respond to peer-on-peer sexual harassment and abuse in education settings
- [guidance on pupil inclusion, well-being, behaviour and attendance](#) to support practitioners

- [Sanctuary website](#) to help sanctuary seekers to understand their rights.
- [360 safe Cymru](#) a free, bilingual tool to support schools to review their online safety provision
- [app guides](#) providing families with key information about the most popular social media and gaming apps children and young people are using today
- guidance for [schools](#) providing advice on understanding and responding carefully to online viral challenges and hoaxes
- [guidance](#) for designated safeguarding persons (DSP), headteachers and senior leadership teams which outlines how to respond to an incident of sharing nudes or semi-nudes.
- [information](#) sharing updates and supporting materials for the Curriculum for Wales
- [strategy](#) on Cymraeg 2050, setting out plans to increase the number of Welsh speakers and promote the Welsh language across education and communities
- [information on attendance and absence](#) to support practitioners
- [information on behaviour and discipline](#) to support practitioners
- [Celebrate and participate: Education guidance to support Gypsy, Roma and Traveller children and young people](#)
- [Community Focused Schools guidance](#) to help schools develop their family engagement provision
- [The Framework on embedding a whole-school approach to emotional and mental well-being](#) to support the delivery and evaluation of the approach
- [Child poverty strategy for Wales: strategy and progress](#) for 2025 together with an update on the Monitoring Framework and an analysis of the lived experience of child poverty, providing an overview of progress towards meeting the objectives

- [School Governors' guide to the law](#) providing school governors' with a reference guide to the law on the roles and responsibilities of a school governing body
- [Information on additional learning needs and statutory guidance to support inclusive education for all learners](#)