Meadow Pathways Wellbeing and Education Cornwall (MPWEC)

Anti-Bullying Policy

Responsibility to update: Zoe Waitz and Michelle Pascoe

Applies to: All staff, contractors, volunteers and visiting professionals working with children and young people (CYP) engaged in Meadow Pathways EOTAS packages (including tuition in homes, community venues and online).

Version No: 2
Date: September 2026
Review Date: September 2027

Summary of Changes – September 2026

This policy has been reviewed and updated to reflect Keeping Children Safe in Education (KCSIE) 2026 (in force 1 September 2026) and Working Together to Safeguard Children 2026 (in force 18 March 2026). Design, branding and layout are unchanged; the changes are:

- References to KCSIE 2025 updated to KCSIE 2026 throughout (Introduction, Specialist tier, Training and workforce development, and Appendix E), and a reference to Working Together to Safeguard Children 2026 added to the Introduction.
- Definition: added nudes/semi-nudes and AI-generated or "deepfake" image-sharing to the definition of cyberbullying, and added misogyny and harmful sexual behaviour (HSB) to the definition of prejudice-based bullying.
- Cyberbullying: added a bullet setting out what staff must do if cyberbullying involves the sharing of nude/semi-nude or AI-generated/deepfake images of a CYP (do not view, copy, print, share or store; follow the Safeguarding and Child Protection Policy and involve the DSL immediately).
- Prejudice-based and protected characteristic bullying: strengthened wording on racism and faith-based prejudice (including Islamophobia and antisemitism), and added that misogyny and harmful sexual behaviour are treated as prejudice-based bullying and may indicate wider peer-on-peer abuse requiring DSL involvement.
- Version, date and review date: updated from Version 1 (September 2025, review September 2026) to Version 2 (September 2026, review September 2027).

Introduction

Meadow Pathways is committed to providing a safe, inclusive and respectful environment free from bullying for all children, young people, staff and visitors. This policy sets out our approach to preventing, identifying and responding to bullying, and aligns with Keeping Children Safe in Education (KCSIE 2026) and Working Together to Safeguard Children 2026, and Anti-Bullying Alliance best practice.

This policy covers all Meadow Pathways settings and delivery modes including 1:1, 2:1, small group, offsite, and online tuition and sessions.

Definition

Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual either physically or emotionally. Bullying can be:

- Physical (hitting, taking belongings)
- Verbal (name-calling, threats, taunts)
- Relational (exclusion, spreading rumours)
- Cyber (online messages, social media, images), including the sharing of nude/semi-nude images and AI-generated or “deepfake” images
- Prejudice-based (linked to protected characteristics: race, religion, disability, sex, sexual orientation, gender identity, pregnancy/maternity, age), including misogyny and harmful sexual behaviour (HSB)

Bullying may be targeted, opportunistic, or persistent and should be distinguished from single incidents or conflict which are dealt with through restorative/relational approaches.

Principles

- Safety and welfare of CYP are paramount and take precedence in all responses.
- We adopt a relational, trauma-informed and neurodiversity-affirming approach; behaviour is communication.
- Prevention is central: high expectations are paired with high support and reasonable adjustments for SEND and neurodivergence.
- Responses are proportionate, lawful, recorded and restorative where possible.
- We work in partnership with CYP, families, commissioners and external agencies.
- All staff have a safeguarding responsibility and must follow reporting procedures where bullying raises safeguarding concerns.

Roles and responsibilities

Directors

- Ensure policy oversight, resource allocation and statutory compliance.
- Review trend data and commissioning implications.

Designated Safeguarding Lead (DSL)

- Maintain oversight of reported bullying incidents; ensure timely action and multi-agency liaison when needed.
- Provide staff guidance and ensure statutory reporting where thresholds for harm are met.

Staff, tutors & therapists

- Model respectful behaviour; teach pro-social skills; intervene early; record incidents accurately; seek support and training.
- Report concerns, support investigations and contribute to restorative work.

Parents/carers

- Share concerns promptly with Meadow Pathways and participate in planning and restorative actions.

Children & young people

- Are encouraged and supported to report bullying, contribute to safety plans and access support.

Prevention strategies (Universal)

Universal approaches reduce incidence and create an inclusive culture:

- Explicit teaching of expectations: respect, kindness, safety and responsibility tailored to CYP.
- Whole-service induction for staff on anti-bullying definitions, reporting and restorative practice (aligned with ABA recommendations).
- Positive behaviour curricula and social skills coaching embedded in sessions.
- Clear online safety routines and guidance for remote sessions (see Online Safety policy).
- Visual supports, predictable routines and reasonable adjustments for CYP with SEND.
- Regular pupil voice, wellbeing checks and anonymous reporting options where appropriate.
- Recording and reviewing environment and supervision arrangements to reduce opportunities for bullying (including during travel/transport to sessions and in online platforms).

Three-tiered response model

Universal (Prevent)

- Apply to all CYP via taught expectations, relationships, routine, supervision and accessible reporting routes.
- Use restorative conversations at first signs of conflict.
- Provide awareness sessions for families on identifying and reporting bullying.

Targeted (Identify & Intervene)

- For CYP showing repeated or escalating concerns.
- Create an Individual Anti-Bullying Plan (IABP): triggers, early warning signs, agreed adult responses, pupil voice, support strategies and measurable outcomes.
- Regular short reviews (weekly/fortnightly) with family and relevant commissioning contact.
- Offer small-group social skills, emotion coaching or mentoring, if appropriate.
- Use restorative conferencing between parties where safe and agreed.

Specialist (Complex / Persistent / Harmful)

- Multi-agency planning and specialist therapeutic input.
- Bespoke risk assessment and updated Behaviour Support Plan (BSP) with safeguarding measures.
- Consider changes to session location, staffing ratios or temporary pauses to support safety.

- Where bullying constitutes criminal behaviour, involve appropriate authorities and follow safeguarding thresholds (KCSIE 2026).
- Maintain careful records and follow up with reintegration and long-term monitoring.

7. Responding to reported incidents

Immediate safeguarding

- If an incident raises immediate safeguarding concerns (abuse, exploitation, credible threats), follow the Child Protection & Safeguarding Policy and contact the DSL and relevant agencies.

Initial response

- Listen to the CYP, take concerns seriously, record facts (who, what, where, when), preserve evidence (screenshots, messages) and avoid criminalising language.
- Provide immediate support to the victim and separate all parties if necessary.

Investigation

- Gather statements from involved parties and witnesses; involve family/carers as appropriate.
- Maintain confidentiality proportionate to need and safeguarding.

Action and resolution

- Use restorative methods where appropriate to repair harm and agree next steps.
- Apply proportionate consequences only when lawful, recorded and explained, taking SEND/trauma factors into account.
- Where necessary, implement targeted or specialist plans and notify commissioning LA where relevant.

Recording & communication

- Record incidents on the incident log with pupil voice, impact and actions.
- Inform parent/carer of outcomes and planned next steps (same day where prohibited items or criminal acts identified).
- Keep records of follow up reviews and evidence of reduced risk.

Cyberbullying

- Cyberbullying may occur outside Meadow Pathways sessions but can affect safety and participation.
- Staff must treat online reports seriously, preserve evidence, involve DSL and family, and follow reporting routes for platform abuse.
- Provide guidance to CYP and families on privacy, blocking, reporting and safe use of technology. Ensure remote sessions use secure platforms and appropriate supervision.
- Where cyberbullying involves the sharing of nude/semi-nude images, or AI-generated or “deepfake” images, of a CYP, staff must not view, copy, print, share or store the image; follow the Safeguarding and Child Protection Policy and KCSIE 2026 guidance, and involve the DSL immediately.

Prejudice-based and protected characteristic bullying

- All prejudice-based incidents must be recorded and reviewed. Where incidents are motivated by protected characteristics, consider escalation, contextual safeguarding and proportionate response.
- Racist and faith-based prejudice, including Islamophobia and antisemitism, will not be tolerated; such incidents are recorded, investigated and responded to robustly, reflecting KCSIE 2026's emphasis on tackling discrimination in all its forms.
- Misogyny and harmful sexual behaviour (HSB) are treated as prejudice-based bullying; where they may indicate wider peer-on-peer abuse, staff must also follow the Safeguarding and Child Protection Policy and involve the DSL (KCSIE 2026).
- Use appropriate restorative reparative work, repair harm and ensure affected CYP feel safe and supported.

Support for those involved

Victim

- Offer immediate regulation and safety, ongoing pastoral or therapeutic support, and involvement in planning reintegration.

Perpetrator

- Focus on education, accountability, restorative repair and access to support (trauma, mental health, mentoring). Use specialist intervention if underlying needs are identified.

Bystanders

- Encourage reporting, provide education about positive bystander action and recognise helpful interventions.

Training and workforce development

- Induction training for all staff includes anti-bullying awareness, recording procedures and restorative approaches.
- Regular CPD updates: KCSIE 2026 changes, cyberbullying, prejudice-based incidents and trauma-informed de-escalation.
- Senior staff and DSL maintain awareness of Anti-Bullying Alliance resources and recommended practice.

Recording, monitoring and evaluation

- Maintain an anti-bullying incident log enabling analysis by type, location, protected characteristic, and outcome.
- DSL/SLT/Directors review data half-termly and include a summary to commissioners or governance as required.
- Use findings to adapt prevention plans, training, placement arrangements and service design.

Reporting and escalation

- Where behaviour constitutes a safeguarding concern, follow Child Protection & Safeguarding procedures.
- Where criminal activity is suspected, advise and involve police in line with local protocols.
- Escalate to commissioning LA where repeated incidents impact placement safety or duties under commissioning agreements.

Partnership with families, CYP voice and communication

- Share this policy with families and include anti-bullying expectations in Home/EOTAS Agreement.
- Capture pupil voice in planning, reviews and restorative processes; provide accessible summaries for CYP.
- Provide clear guidance to parents on reporting routes and expected timelines for response.

Equality, inclusion and reasonable adjustments

- Ensure the policy is implemented fairly, recognising the needs of disabled and neurodivergent CYP.
- Reasonable adjustments must be made so that prevention and response processes are accessible to all.

Complaints

- Families or CYP dissatisfied with outcomes should use the Meadow Pathways Complaints Policy. Safeguarding concerns about professional practice should follow local whistleblowing and escalation routes.

Monitoring and review

- The policy is reviewed annually or sooner following:
    - Changes to KCSIE or national guidance;
    - Serious incidents or safeguarding learning;
    - Feedback from CYP, families, staff or commissioning bodies.

Linked policies/procedures

- Child Protection & Safeguarding
- Behaviour Policy
- Online Safety & Acceptable Use
- SEND & Reasonable Adjustments
- Data Protection & Record Retention
- Complaints
- Positive Handling / Use of Reasonable Force (if applicable)
- Home/EOTAS Agreement

Appendices (templates and quick guides)

Appendix A: Reporting and Incident Record Template

- Date/time; location; CYP involved; description; witnesses; evidence (screenshots); immediate actions; safeguarding checks; parent/carer notified; follow up actions; reviewer.

Appendix B: Individual Anti-Bullying Plan template

- Identified concerns; early warning signs; agreed staff responses; restorative goals; measurable outcomes; review dates.

Appendix C: Guidance for responding to cyberbullying

- Preserve evidence; advise on safety and blocking; report to platform; inform parents and DSL; consider police if criminal.

Appendix D: Parental guidance summary

- How to report; what to expect; support and timescales; safeguarding thresholds.

Appendix E: Resources and references

- Keeping Children Safe in Education (KCSIE 2026) – DfE
- Anti-Bullying Alliance: policy recommendations and resources (2025)
- Childnet, NSPCC and other specialist agencies for cyber and prejudice-based bullying.