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AMBASSADOR INTERNATIONAL ACADEMY, MANKHOOL

Anti-Bullying Policy

Whole School

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Contents

Section 2: Commitment and policy statement 4

Section 3: Purpose 4

Section 4: Scope 4

Section 5: Legal & Regulatory Framework 5

Section 6: Guiding Principles 5

Best interests and safety 5

Child-centred practice 5

Early intervention 5

Equity and inclusion 5

Proportionality and fairness 6

No retaliation 6

Privacy 6

Repair and change 6

Section 7: Definitions 6

7.1 Bullying 6

7.2 Important distinctions 6

Section 8: Forms of Bullying 7

Section 9: Signs and Indicators 8

Section 10: Roles and Responsibilities 9

10.1 Principal 9

10.2 Head of Counselling and Safeguarding / DSL 9

10.3 Vice Principal/Pastoral Lead 9

10.4 Teachers and all staff 9

10.5 Students 10

10.6 Parents and guardians 10

Section 11: Prevention and whole-school culture 10

Section 12: Reporting a concern 11

Reporting routes 11

Section 13: Staff response and immediate safety 11

Section 14: Assessment and investigation 12

14.1 Initial assessment 12

14.2 Investigation process....12
14.3 Timeliness....12
Section 15: Outcomes, support and consequences....12
15.1 Support for the student who experienced harm....13
15.2 Intervention for the student displaying bullying behavior....13
15.3 Support for peers and groups....13
15.4 Follow-up and closure....13
Section 16: Restorative practice....13
Section 17: Parent and guardian communication....14
Section 18: Cyberbullying....14
18.1 Student and family response....14
Section 19: Safeguarding escalation and external referal....15
Section 20: Recording, confidentiality and information sharing....15
Section 21: Monitoring, evaluation and review....15
Section 22: Related policies and references....15
22.1 Related AIAM policies....15
22.2 Authoritative references....16
Appendix A: Staff response pathway....16
Appendix B: Initial assessment and follow-up checklist....17
Appendix C: Student reporting guidance....17

Section 2: Commitment and policy statement

Ambassador International Academy, Mankhool, does not tolerate bullying. Every concern will be heard, recorded, assessed and responded to. The school will protect the student who has experienced harm, address the behaviour, support behavioural change and monitor whether safety and belonging have been restored.

AIAM is committed to a safe, inclusive and respectful learning community in which every student is known, heard and protected. Bullying, discrimination, harassment, retaliation and child-on-child abuse are incompatible with this commitment and will be addressed promptly and proportionately. AIAM recognizes that bullying can affect emotional safety, attachment to school, peer belonging, attendance, learning and mental health. The school therefore treats anti-bullying work as a shared safeguarding, pastoral, behavioral and educational responsibility. Prevention is embedded through relationships, curriculum, supervision, student voice, digital citizenship and early intervention rather than relying only on sanctions after harm has occurred.

All reported concerns will be taken seriously, including concerns that do not meet the formal definition of bullying. A behavior does not need to be labelled “bullying” before the school acts to stop harm and provide support.

Section 3: Purpose

This policy establishes a consistent whole-school framework to:

- prevent bullying and strengthen a culture of dignity, belonging, empathy and responsible action;
- define bullying and distinguish it from conflict, friendship difficulties and isolated harmful incidents;
- provide accessible reporting routes for students, parents, staff and bystanders;
- set out how concerns are recorded, assessed, investigated, responded to and monitored;
- ensure proportionate support for the student experiencing harm, the student displaying bullying behavior and affected peers;
- identify when behaviour must be managed under safeguarding and child protection procedures;
- clarify responsibilities and promote consistent practice across the school; and
- use incident patterns, student voice and wellbeing data to improve prevention and supervision.

Section 4: Scope

This policy applies to all students and to all adults working for or on behalf of AIAM. It covers behavior:

- on the school site and during the school day;
- on school transport;
- during extracurricular activities, clubs, trips, competitions and school events;
- during remote learning or through school-managed digital environments;
- online or outside school when the conduct affects a student's safety, wellbeing, relationships or participation in school; and
- in interactions involving AIAM students where the school has a reasonable safeguarding or duty-of-care interest.

Concerns involving an adult and a student are not managed as bullying between students. They must be referred immediately to the DSL and managed under the Safeguarding and Child Protection Policy and the procedure for allegations against adults.

Section 5: Legal & Regulatory Framework

This policy is informed by the following UAE and international frameworks, as amended from time to time:

- Federal Law No. 3 of 2016 on Child Rights (Wadeema's Law), including the child's right to protection from physical, psychological and moral harm;
- Cabinet Resolution No. 52 of 2018 concerning the Executive Regulations of the Child Rights Law;
- Federal Decree-Law No. 34 of 2021 on Countering Rumours and Cybercrimes, as amended;
- the UAE National Child Protection Policy in Educational Institutions;
- Ministerial Resolution No. 645 of 2020 concerning bullying prevention in public schools and private schools following the Ministry curriculum, used as relevant national guidance;
- KHDA expectations concerning student protection, wellbeing, safety and effective school response to bullying; and
- the United Nations Convention on the Rights of the Child, particularly Articles 2, 3, 12, 19, 28 and 29.

Where conduct may constitute abuse, a criminal offence or an immediate threat to safety, AIAM will follow its safeguarding procedures and cooperate with the competent UAE authorities. This policy does not replace statutory reporting obligations.

Section 6: Guiding Principles

Best interests and safety.
The student's safety, dignity and welfare guide decision-making.

Child-centred practice.
Students will be listened to, informed about next steps and involved in decisions in a developmentally appropriate way.

Early intervention.
Staff respond to emerging patterns and harmful conduct before they escalate.

Equity and inclusion.
The school considers disability, additional needs, communication differences, culture, language, gender and other identity-related factors.

Proportionality and fairness.
Decisions are based on evidence, context, impact, developmental stage, pattern and risk. All students are given an opportunity to be heard.

No retaliation.
Retaliation against a person who reports, supports or participates in an investigation is prohibited and will be addressed.

Privacy.
Information is shared only with those who need it to protect students and manage the concern.

Repair and change.
Consequences, education, support and restorative approaches are used to stop harm and reduce recurrence.

Section 7: Definitions

7.1 Bullying

Bullying is harmful behavior by an individual or group that is repeated, or has a strong likelihood of being repeated and involves a real or perceived imbalance of power. The behavior may be physical, verbal,

relational, psychological, discriminatory, sexualized, material or online. It causes, or is reasonably likely to cause, fear, humiliation, exclusion, distress, injury or interference with learning and participation.

Power imbalance may arise from physical strength, popularity, group size, age, status, access to information or images, digital reach, social influence, language, disability, vulnerability or another circumstance that makes it difficult for the affected student to stop the behavior or protect themselves.

7.2 Important distinctions

Term	Meaning in this policy
Conflict	A disagreement between students with relatively equal power and some capacity for mutual problem-solving. Conflict can still be harmful and requires support, but is not automatically bullying.
Isolated harmful behaviour	A one-off act of aggression, cruelty, exclusion, intimidation or online harm. It may not meet the repeated-pattern definition but will still be addressed under the Behavior Policy and, where relevant, safeguarding procedures.
Teasing	Playful interaction is only mutual when everyone experiences it as safe and can freely ask for it to stop. Repeated or unwanted teasing that humiliates or targets vulnerability may constitute bullying.

Banter or joking	The label "joke" does not remove impact or responsibility. Harmful, discriminatory, sexualized or coercive conduct will not be dismissed as banter.
Child-on-child abuse	Harmful behavior by one child towards another that may include physical, sexual or emotional abuse, coercion, exploitation, harassment or serious violence. It is a safeguarding concern and may overlap with bullying.
Harassment	Unwanted conduct related to identity or personal characteristics that violates dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. A single serious incident may require action.
Bystander	A person who witnesses, knows about or receives online content relating to harmful behavior. A bystander may reinforce, ignore, interrupt, report or support.
Upstander	A person who takes a safe, constructive action such as reporting, seeking help, refusing to share content or supporting the affected student.

Section 8: Forms of Bullying

1. Physical:

hitting, kicking, pushing, tripping, restraining, unwanted touching, damaging possessions, blocking movement or using physical presence to intimidate.

2. Verbal:

repeated insults, threats, humiliating comments, mocking, name-calling or remarks about appearance, ability, family, language or background.

3. Relational or social:

deliberate and repeated exclusion, group manipulation, silent treatment, malicious gossip, rumour spreading, friendship coercion or attempts to damage reputation and belonging.

4. Psychological:

intimidation, threats, stalking, coercion, humiliation, manipulation, extortion or making a student fear what will happen next.

5. Cyberbullying:

harm through messages, posts, images, videos, impersonation, exclusion, gaming platforms, group chats, altered media, sharing private information, coordinated attacks or repeated unwanted contact.

6. Identity-based:

targeting actual or perceived race, nationality, ethnicity, culture, religion, language, sex, gender, disability, special educational need, health condition, appearance, family circumstance or another identity characteristic.

7. Sexualised:

sexual comments, gestures, rumours, pressure, unwanted sexual attention, sharing sexual content or images, or conduct that may amount to sexual harassment or abuse.

8. Material or property-related:

stealing, hiding, damaging or demanding possessions or money, including coercing another student to obtain items.

A single online post, image or recording may be treated as bullying when its reach, permanence, repeated viewing or sharing creates continuing harm.
AIAM does not require repeated posting by the original sender before acting.

Section 9: Signs and Indicators

No single sign proves that bullying is occurring. Repeated changes or clusters of indicators require sensitive enquiry.

Possible indicators include:

- reluctance or refusal to attend school, use transport, enter particular spaces or participate in activities;
- unexplained anxiety, withdrawal, irritability, tearfulness, sleep disturbance, nightmares or somatic complaints such as headaches or stomach aches;
- decline in concentration, attainment, engagement or attendance;
- missing, hidden or damaged belongings, unexplained requests for money or loss of lunch/items;
- unexplained injuries or damaged clothing;
- changes in friendships, isolation, avoidance of peers or fear of particular students;

- distress after using a device, reluctance to discuss online activity, deletion of accounts or sudden changes in digital use;
- self-blame, reduced self-esteem, hopelessness, self-harm statements or behavior; and
- reluctance to explain what is wrong because of fear, shame, retaliation or concern about not being believed.

Students displaying bullying behavior may also require support. Behavior may be associated with difficulties in empathy, emotional regulation, belonging, impulse control, peer status, learned behavior, unmet needs or the student's own experiences of harm. These factors inform intervention but do not excuse harmful conduct.

Section 10: Roles and Responsibilities

10.1 Principal

- approves this policy and holds ultimate accountability for implementation;
- ensures sufficient staffing, training, systems and resources;
- promotes a safe, respectful school culture and consistent application of related policies;
- receives trend and effectiveness reports from the Head of Counselling and Safeguarding and relevant leaders; and
- authorizes serious behavioral outcomes and external liaison in line with AIAM procedures and UAE requirements.

10.2 Head of Counselling and Safeguarding / DSL

- owns and reviews this policy and serves as the central safeguarding lead for bullying concerns;
- advises on risk, child-on-child abuse, protective measures and external referral;
- ensures accurate, secure recording on CPOMS and appropriate follow-up;
- supports or leads complex investigations with the Vice Principal/Pastoral Lead;
- coordinates psychological support and safety planning where needed;
- analyses patterns and reports themes without unnecessary identifying information; and
- provides staff training and preventive guidance.

10.3 Vice Principal/Pastoral Lead

- coordinates the operational response and investigation with the Counsellor/DSL;
- ensures immediate safety, appropriate supervision and timely communication;
- gathers and reviews evidence fairly, including relevant behavioral history;
- determines behavioral responses with authorized leaders under the Behavior Policy;
- coordinates staff actions, parent meetings, reintegration and monitoring; and
- checks that the behavior has stopped and the affected student's sense of safety is recovering.

10.4 Teachers and all staff

- remain vigilant and intervene safely when harm is witnessed;
- listen calmly, reassure the student and avoid promising confidentiality;
- record and report concerns promptly on CPOMS, including facts, exact words and immediate action;
- do not conduct informal mediation, confront alleged students together or ask students to investigate;
- reinforce respectful behavior, inclusion and safe reporting;
- provide reasonable classroom and supervision adjustments; and
- protect students from retaliation and maintain confidentiality.

10.5 Students

- treat others and their property with dignity and respect;
- do not participate in, encourage, record, like, forward or conceal bullying;
- report concerns about themselves or another student to a trusted adult;
- preserve relevant online evidence without redistributing harmful content;
- follow safety plans and school expectations; and
- participate honestly in support, reflection and repair when appropriate.

10.6 Parents and guardians

- reinforce respectful and responsible behavior, including online conduct;
- report concerns promptly through school channels and provide relevant information;
- avoid confronting another student or family directly, posting allegations online or conducting an independent student investigation;
- work collaboratively with the school during assessment, intervention and follow-up;
- monitor wellbeing and digital use while respecting the child's dignity; and
- understand that confidentiality prevents the school from disclosing another student's personal information, consequences or support plan.

Section 11: Prevention and whole-school culture

AIAM will use a developmental, relational and data-informed prevention approach that includes:

- clear expectations for behavior, relationships and digital citizenship;
- age-appropriate learning about bullying, consent, boundaries, empathy, help-seeking, safe bystander action and online conduct;
- restorative classroom practice, community-building circles and explicit teaching of social-emotional skills;
- visible and accessible trusted-adult and reporting pathways;
- active supervision informed by incident patterns and student feedback;
- induction and refresher training for teaching and non-teaching staff, including transport and support personnel;
- student voice, surveys and consultation to identify unsafe spaces, peer dynamics and barriers to reporting;
- inclusive practices and reasonable adjustments for students of determination and students with communication or additional needs;
- parent information on signs, reporting, digital safety and constructive partnership; and
- recognition and reinforcement of kindness, courage, inclusion and responsible upstander behavior.

Section 12: Reporting a concern

A student may report verbally, in writing, through a parent, through an available school reporting mechanism or to any trusted adult. Reports may also come from witnesses, peers, staff, surveys or digital evidence. Anonymous information will be considered and investigated as far as reasonably possible.

Reporting routes

- class or homeroom teacher;
- any teacher, teaching assistant or support staff member;
- Vice Principal/Pastoral Lead;
- School Counsellor/DSL or another safeguarding team member;
- Principal, school nurse, administration or transport staff;
- a parent or guardian, who should contact the school; or
- CPOMS for staff recording and internal escalation.

Students should report again, or approach another trusted adult, if they remain unsafe or believe the concern has not been resolved. Reporting is a protective action, not “telling tales”.

Section 13: Staff response and immediate safety

When a concern is received, the adult must:

- listen without judgement and allow the student to speak in their own words;
- acknowledge the student’s experience and thank them for reporting;
- check immediate physical and emotional safety, including risk of retaliation, self-harm or further online spread;
- take urgent protective action within their role and seek the DSL immediately where risk is significant;
- explain that information will be shared only with people who need to help;
- record the concern factually on CPOMS before the end of the working day, or immediately where risk is urgent; and
- notify the Vice Principal/Pastoral Lead and Counsellor/DSL through the agreed internal route.

Staff must not promise secrecy, ask leading or repeated questions, require the student to confront another student, arrange an immediate joint meeting, or delay reporting while attempting to establish whether the behavior “really is bullying”.

Section 14: Assessment and investigation

The Vice Principal/Pastoral Lead will manage the investigation with the Counsellor/DSL. The scope and personnel will be proportionate to the concern and potential safeguarding risk.

14.1 Initial assessment

The initial assessment considers immediate safety, seriousness, frequency, duration, power imbalance, intent where known, impact, vulnerability, identity-based factors, digital reach, possible criminal conduct, previous concerns and the risk of recurrence or retaliation.

Immediate protective measures do not depend on a final finding.

14.2 Investigation process

- meet students separately and in a suitable, private setting;
- use open, non-leading questions and record the student's account accurately;
- identify dates, locations, witnesses, patterns, context and impact;
- obtain relevant staff observations and review existing CPOMS or behavior records;
- preserve relevant digital evidence lawfully and avoid unnecessary redistribution;
- consider communication needs, age, disability, language and whether a trusted adult or specialist support is required;
- give the student alleged to have displayed the behavior a fair opportunity to respond;
- avoid assumptions based on popularity, attainment, prior reputation or whether the affected student appears resilient; and
- record the rationale for the outcome, actions, responsible persons and review dates.

The finding will use the balance of probabilities for internal school decision-making.

Possible outcomes include:

- bullying substantiated;
- harmful behavior substantiated but the bullying threshold not met;
- insufficient information to determine;
- or concern not substantiated.

'Not substantiated' does not mean that a report was dishonest, and support or monitoring may still be appropriate.

14.3 Timeliness

Urgent safety action is immediate. The school will aim to complete the initial assessment within two school days and the investigation within five school days. Complex cases may require longer.

Families will be informed of material delays and the protective arrangements in place.

Section 15: Outcomes, support and consequences

AIAM will select actions according to risk, severity, impact, repetition, age, developmental understanding, vulnerability, previous interventions and the student's response.
Behavioral consequences are determined under the AIAM Behavior Policy. A bullying label is not required before a behavioral response is applied.

15.1 Support for the student who experienced harm

- a named trusted adult and regular check-ins;
- an individual safety plan, including safe routes, supervision, seating, transport or transition arrangements;
- counselling or social-emotional support with appropriate consent;
- support to restore peer connection, learning participation and attendance;
- digital safety steps and assistance preserving or reporting online content;
- reasonable academic or environmental adjustments; and
- scheduled review to confirm that harm and retaliation have stopped.

15.2 Intervention for the student displaying bullying behavior

- clear limits and proportionate consequences under the Behavior Policy;
- developmentally appropriate reflection and accountability;
- a behavior support plan with explicit replacement behaviors and monitoring;
- counselling, emotional regulation, empathy, social problem-solving or relationship support;
- increased supervision or restricted access where needed for safety;
- parent partnership and review meetings; and
- safeguarding assessment where the behavior may indicate that the student is also experiencing harm or exploitation.

15.3 Support for peers and groups

- safe bystander education and reinforcement of reporting;
- targeted classroom, group or year-level intervention without identifying students;
- support for witnesses who are distressed, fearful or pressured; and
- action to address group norms, online circulation, exclusion dynamics or unsafe locations.

15.4 Follow-up and closure

The case is not closed solely because an investigation or consequence is complete. The responsible lead will review safety and wellbeing at agreed intervals, ordinarily within one week, two weeks and four to six weeks, adjusted to risk. Closure requires evidence that the behavior has stopped, protective measures are effective, the affected student feels safer, retaliation has not occurred and ongoing support has a clear owner. The record will document the student's voice and closure rationale.

Section 16: Restorative practice

AIAM may use restorative conversations, reflection, problem-solving or carefully facilitated meetings to support accountability and repair. Restorative practice complements, but does not replace, safeguarding action or Behavior Policy consequences.
A joint restorative process will occur only when it is safe, voluntary, developmentally appropriate and desired by the student who experienced harm. It will not be used where there is coercion, intimidation, a significant unresolved power imbalance, sexual harm, serious violence, exploitation, fear of retaliation or another safeguarding concern. An apology alone is not evidence that safety has been restored.

Section 17: Parent and guardian communication

The Vice Principal/Pastoral Lead or delegated leader will communicate with the parents or guardians of students directly involved at an appropriate stage, unless doing so may increase safeguarding risk or conflict with direction from a competent authority.
Communication will be timely, factual, respectful and focused on safety, process and the child's own support or responsibilities.
The school will not disclose another student's confidential information, counselling details, personal circumstances or specific consequences. Families may be told that appropriate action has been taken in accordance with school policy. Records of significant communication will be stored on CPOMS.

Section 18: Cyberbullying

Cyberbullying may occur through messaging, social media, group chats, email, shared documents, games, video platforms, altered or AI-generated media, anonymous accounts or any other digital channel. It can occur at any time and may create persistent harm through copying, forwarding, searchability and audience reach.

18.1 Student and family response

- do not reply, retaliate or redistribute harmful content;
- save relevant evidence such as screenshots, usernames, dates, links and context;
- block or report accounts where appropriate, while preserving evidence first;
- inform the school when the conduct involves AIAM students or affects school safety and participation; and
- contact emergency services or competent authority where there is an immediate threat, extortion, sexual content, exploitation or serious criminal risk.

The school may act when out-of-school online conduct has a direct and material effect on school safety, wellbeing, relationships or learning. Device searches, evidence handling and external reporting will follow applicable UAE law and AIAM policies.

Section 19: Safeguarding escalation and external referral

The Safeguarding and Child Protection Policy takes precedence where a concern involves serious violence, credible threats, coercion, extortion, sexual harassment or sexual abuse, exploitation, discriminatory abuse, self-harm or suicide risk, weapons, criminal activity, harmful sexual behavior, sharing intimate images, or a significant risk to any child.

Staff must make an immediate verbal referral to the DSL and record the concern on CPOMS. The DSL will assess risk, consult the Principal as appropriate, implement protection measures and liaise with the competent UAE authorities or specialist services where required. Staff must not contact alleged perpetrators, delete evidence or independently notify external parties outside the safeguarding procedure unless emergency action is necessary to preserve life or immediate safety.

Section 20: Recording, confidentiality and information sharing

- All concerns, decisions, actions, communications and reviews will be recorded factually on CPOMS.
- Records must distinguish observed facts, reported information, professional assessment and decision rationale.
- Access is restricted to authorized staff on a need-to-know basis.
- Information may be shared without consent where necessary to protect a child, comply with law or cooperate with a competent authority.
- Students and families must not be promised absolute confidentiality.
- Bullying data used for monitoring will be anonymized or aggregated wherever possible and handled under AIAM's data protection and retention arrangements.

Section 21: Monitoring, evaluation and review

The Head of Counselling and Safeguarding will monitor implementation with the Vice Principal/Pastoral Lead.

Review will consider:

- number, type, location and timing of reports;
- repetition, retaliation, identity-based patterns and online incidents;
- time from report to safety action, assessment, follow-up and closure;
- student and parent confidence in reporting and response;
- student voice, wellbeing surveys and perceptions of safety and belonging;
- groups, spaces or transitions requiring targeted prevention or supervision;
- recurrence after intervention and effectiveness of support plans; and
- staff training needs and consistency of recording.

The Principal will receive periodic assurance on trends and effectiveness without unnecessary personal information. This policy will be reviewed annually, and earlier following significant legislation, guidance, school change, a serious incident or evidence that procedures require improvement. Student and parent voice will inform review where appropriate.

Section 22: Related policies and references

22.1 Related AIAM policies

- Safeguarding and Child Protection Policy
- Behavior Policy
- Online Safety / Cyber Safety Policy
- Acceptable Use Policy
- Wellbeing Policy
- Inclusion Policy

- Complaints Policy
- Whistleblowing Policy
- Data Protection and Records Retention Policy
- Staff Code of Conduct

22.2 Authoritative references

- **UAE Federal Law No. 3 of 2016 on Child Rights (Wadeema's Law):** https://uaelegislation.gov.ae/en/legislations/1176
- **UAE Federal Decree-Law No. 34 of 2021 on Countering Rumours and Cybercrimes:** https://uaelegislation.gov.ae/en/legislations/1526
- **UAE National Child Protection Policy in Educational Institutions:** https://uaelegislation.gov.ae/en/policy/details/lsy-s-lotny-lhm-y-ltfl-fy-lm-ss-t-ltaalymy
- **Ministry of Education Resolution No. 645 of 2020 on Bullying Prevention:** https://www.moe.gov.ae/en/about-us/legislations/Pages/ministerial-resolution-645-2020-bullying-prevention-policy.aspx
- **KHDA Wellbeing Matters framework:** https://web.khda.gov.ae/en/Resources/Publications/School-Inspection/Wellbeing-Matters-A-guiding-framework-for-the-moni
- **United Nations Convention on the Rights of the Child:** https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child

Appendix A: Staff response pathway

Step	Action	Minimum expectation
1	**Receive and reassure**	Listen calmly. Thank the student. Do not promise secrecy or ask leading questions.
2	**Protect**	Check immediate safety, injury, retaliation, self-harm risk and online spread. Seek urgent help where needed.
3	**Record**	Enter a factual CPOMS record promptly, using the student's own words where relevant.
4	**Report**	Notify the Vice Principal/Pastoral Lead and Counsellor/DSL through the agreed route. Escalate safeguarding risk immediately.
5	**Assess and investigate**	Separate accounts, review evidence and history, assess pattern, power, impact and risk.
6	**Respond**	Apply protective measures, support, Behaviour Policy consequences and targeted intervention.
7	**Review**	Check at agreed intervals that behaviour and retaliation have stopped and safety and belonging are recovering.
8	**Close or continue**	Record the student's voice, outcome and rationale. Continue monitoring or reopen if concerns recur.

Appendix B: Initial assessment and follow-up checklist

Immediate safety

☐ Student is physically safe and any injury has been addressed.
☐ Risk of retaliation, further contact or online circulation has been considered.
☐ Self-harm, suicide, serious violence, sexual harm, coercion and criminal risk have been screened.
☐ Temporary supervision, seating, transport, device or movement arrangements have been considered.

Assessment quality

☐ Each student has been spoken with separately and fairly.
☐ Pattern, repetition or likelihood of repetition has been considered.
☐ Power imbalance, vulnerability and identity-related factors have been assessed.
☐ Impact on wellbeing, attendance, learning and belonging has been recorded.
☐ Relevant witnesses, staff observations, digital evidence and prior records have been reviewed.
☐ The outcome and rationale have been recorded on CPOMS.

Response and review

☐ Named adult and support plan are in place for the student who experienced harm.
☐ Behavioral response and intervention are aligned with the Behavior Policy.
☐ Parents/guardians have been informed appropriately.
☐ Review dates and responsible people are recorded.
☐ Retaliation and recurrence are being monitored.
☐ Closure includes student voice and evidence that safety has improved.

Appendix C: Student reporting guidance

If something keeps happening, makes you feel unsafe or excluded, uses power against you, or spreads online, tell a trusted adult. You will not be in trouble for asking for help.

- Tell any trusted adult at school or at home.
- Say what happened, where, when, who was involved and whether anyone saw it.
- Show or save online evidence, but do not forward harmful content.
- Tell the adult if you are afraid of what may happen after reporting.
- Ask what will happen next and who will check in with you.
- Tell another adult if you still feel unsafe or the behaviour continues.
- If you witness bullying, do not join in, like, record or share it. Get help and support the person safely.