# Countering Bullying Policy

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**Introduction**

At Cameron and Cooper Limited, we are committed to creating a safe, inclusive, and nurturing environment where every young person feels valued, protected, and supported. We recognise that for young people to thrive, they must feel emotionally safe as well as physically safe. Bullying undermines this and can cause lasting harm to a young person's well-being, development, and ability to trust others.

We believe in a proactive and relational approach to preventing bullying. Our adults model values of kindness, fairness, and respect in all interactions and actively build positive peer and adult relationships. When incidents of bullying do occur, they are treated seriously and responded to with care, structure, and clear expectations, in line with our ethos of Love, Care, and Consistency.

Our approach to tackling bullying is fully aligned with legislation, statutory guidance, and sector best practice. This includes:

- **Children Act 1989 and 2004**
- **The Equality Act 2010**
- **Education and Inspections Act 2006**
- **Education Act 2011**
- **Children's Homes (England) Regulations 2015** and the **Guide to the Children's Homes Regulations including the Quality Standards (April 2015)**
- **Keeping Children Safe in Education (September 2025)**
- **Preventing and Tackling Bullying (Department for Education, latest edition)**

We understand that both prevention and education are key. All adults receive regular training on identifying, preventing, and responding to bullying, including online abuse and discriminatory bullying. Young people are supported through key adult sessions, group work, and access to safe spaces to talk about friendship, difference, and respect. Where bullying is identified, we act quickly to safeguard everyone involved and ensure the young person responsible is supported to reflect and change.

This policy must be read alongside:

- **Equality, Diversity, and Inclusion Policy**
- **Complaints Policy**
- **Children's Guide**
- **Behaviour Management Policy**
- **Online Safety and Digital Wellbeing Policy**

**Definition of Bullying**

At Cameron and Cooper Limited, we define bullying as deliberate, repeated behaviour that causes harm, distress, or intimidation to another person. It involves a real or perceived

imbalance of power, where one person or group uses power, whether physical strength, social influence, or emotional control, to target another.

Bullying can be:

- **Physical** – hitting, pushing, or physically intimidating someone.
- **Verbal** – name-calling, threats, or hurtful language.
- **Emotional** – spreading rumours, isolating others, or manipulative behaviour.
- **Online (cyberbullying)** – abusive messages, sharing personal content without consent, or exclusion from online groups.
- **Discriminatory** – targeting someone based on their race, faith, gender, disability, sexuality, or any protected characteristic.

**Bullying as a Safeguarding Concern**

Bullying is often underpinned by prejudice or discrimination, and we treat all such behaviour as a safeguarding concern. Our focus is on safety, understanding, and accountability. We support those affected and help those displaying harmful behaviour to reflect and change.

While many incidents can be addressed within our setting through relational and restorative responses, some forms of bullying may amount to criminal behaviour or represent a serious safeguarding risk. Where bullying behaviour constitutes or may constitute abuse, harm, or a criminal offence, we will follow the Safeguarding and Child Protection Policy. A referral will be made to children's social care and, where appropriate, the police.

If the behaviour involves an adult working with children, such as an allegation that an adult has bullied, intimidated, or harmed a young person, this will be treated as a safeguarding allegation. In these cases, we will refer the concern to the Local Authority Designated Officer (LADO) without delay. This is in line with Working Together to Safeguard Children (2023). The referral may lead to a formal investigation, disciplinary action, or removal from the role depending on the outcome.

We are also clear that bullying is not limited to young people. Adults at Cameron and Cooper Limited are expected to model respectful, inclusive, and professional behaviour at all times. Concerns about bullying or inappropriate conduct among colleagues will be addressed through the Staff Disciplinary, Grievance, Harassment, and Whistleblowing Policy. These concerns may also be escalated further if required.

At Cameron and Cooper Limited, we do not label young people as "bullies" or "victims". These are behaviours, not identities. Bullying behaviour is often a response to unmet needs, distress, or learned patterns. With the right support, it can be unlearned. Our aim is always to understand, intervene, and rebuild trust while ensuring that everyone feels safe, respected, and supported.

**Online Bullying**

The growth of digital technology means that bullying now extends beyond physical spaces into online environments. Online bullying, sometimes called cyberbullying, can happen at any time and in any place, often without adult oversight. Its impact can be just as serious as in-person bullying, particularly because harmful content can be shared widely, instantly, and anonymously.

At Cameron and Cooper Limited, we treat online bullying as a safeguarding concern. It includes harassment, exclusion, impersonation, the sharing of hurtful content, or the disclosure of private information without consent. We respond with care, curiosity, and clear safeguarding action, always prioritising the emotional safety of the young person.

**Forms of online bullying include:**

- **Harassment and trolling**: Repeated, unwanted, and offensive messages, including name-calling or humiliation via social media or games.
- **Spreading rumours or lies**: Sharing harmful information, true or false, about someone's personal life, including their identity or relationships.
- **Impersonation**: Pretending to be someone else to embarrass or harm them, including sharing false or humiliating content.
- **'Outing'**: Disclosing someone's private or sensitive information (e.g. gender identity or sexuality) without their permission.
- **Exclusion**: Intentionally leaving someone out of online groups, chats, or digital activities to isolate or humiliate them.

Where online bullying raises concerns about abuse or criminal behaviour, we follow our Safeguarding and Child Protection Policy. This may involve referral to children's social care or the police, depending on the nature and severity of the behaviour. All concerns involving the sharing of sexualised images, grooming, exploitation, or hate speech are treated with the utmost seriousness and escalated appropriately. We do not wait for harm to escalate before acting.

This section is informed by the following legislation and statutory guidance:

- Children Act 1989 and 2004
- Education Act 2011
- Equality Act 2010
- Online Safety Act 2023
- Data Protection Act 2018 and UK GDPR
- Keeping Children Safe in Education (2025)
- Guide to the Children's Homes Regulations and Quality Standards (2015)
- Working Together to Safeguard Children (2023)

We use resources from CEOP, Thinkuknow, and Childnet to guide safe and effective responses.

**Advice for Young People (from Thinkuknow.co.uk):**

1. **Tell an adult you trust**
   Do not deal with bullying alone. Talk to a trusted adult such as a parent, carer, or key adult in your home or school. You can also contact **Childline on 0800 1111** or speak with a counsellor online.

2. **Talk to someone your age**
   Peer support helps. If you are not ready to talk to an adult, you can speak to a friend or post safely on **Childline's message boards**.

3. **Block the bullies**
   Most platforms allow you to block people or mute conversations. This can help stop further harm.

4. **Keep the evidence**
   Save screenshots or messages in case they need to be reviewed or reported.

5. **Report harmful content**
   Websites and apps have tools to report offensive or inappropriate material. If someone is threatening you or sharing images without consent, report it immediately.

6. **If your nude images have been shared or you are being pressured to share one**
   You can report this directly to **CEOP**. CEOP works with law enforcement and safeguarding teams to keep young people safe from exploitation.
   Visit: https://www.thinkuknow.co.uk

We actively monitor online activity where appropriate and in line with our Online Safety and Digital Wellbeing Policy. Young people are supported to use devices safely and are helped to understand privacy, respectful behaviour, and the risks associated with digital life.

**Protected Characteristics**

At Cameron and Cooper Limited, we treat any behaviour that excludes, marginalises, or targets a person because of their identity or background as a serious safeguarding concern. This includes language, actions, or attitudes that relate to any of the protected characteristics set out in the Equality Act 2010.

We are clear that bullying rooted in discrimination is unacceptable. Whether explicit or subtle, prejudice-based behaviour can cause deep harm, especially for young people who may already feel isolated or misunderstood. All adults are expected to challenge discrimination confidently and sensitively, ensuring that all young people feel seen, valued, and safe.

**Protected characteristics under the Equality Act 2010 include:**

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

This includes, for example, bullying or exclusion based on a young person's sexual orientation, gender identity, ethnicity, or perceived difference. It also includes harm caused through association, such as bullying someone because they have a sibling or parent who is disabled or LGBTQ+.

When any incident of this nature occurs, it will be treated with urgency and care. The steps outlined in this policy will be followed, including safeguarding checks, restorative responses, and engagement with the young person and relevant professionals. Repeated or serious incidents may lead to further action, including external referrals or review of placement suitability.

All adults have a responsibility to promote equality, dignity, and inclusion in everything they do. Training and reflection on unconscious bias, inclusive language, and trauma-informed responses are part of our commitment to a culture of Love, Care, and Consistency.

**Working Proactively with Young People**

At Cameron and Cooper Limited, we prioritise building trust, clarity, and confidence from the point of placement. Every young person is supported to understand their rights and responsibilities, including expectations around safe and respectful behaviour.

Upon moving in, each young person is guided through the Children's Guide, which includes key information about our expectations, how we manage behaviour, and how we respond to bullying. The organisation's approach to anti-bullying is also explained clearly during the placement meeting.

As part of this process, young people are supported to understand and agree to our Multimedia Agreement, which outlines safe, respectful, and appropriate use of phones, devices, and social media. This sets the foundation for ongoing conversations about online conduct and respectful relationships.

To deepen understanding, key adults use tailored key working sessions to explore bullying and respectful relationships in ways that are meaningful to each young person. These sessions are creative, responsive, and adapted to the individual's communication style, needs, and experiences.

Alongside this, all young people take part in PSHE sessions through home-based or school learning. These sessions explore themes such as self-esteem, healthy relationships, diversity, and digital safety.

To promote collective awareness, the organisation also runs awareness days, group discussions, and themed projects that give young people the chance to reflect, share experiences, and learn from each other in a safe, supportive environment.

Adults use monitoring systems such as Qustodio to receive alerts linked to inappropriate or concerning online activity. Where a safeguarding concern is raised, this is immediately reviewed and responded to in line with the Safeguarding and Child Protection Policy. Adults are trained to take proportionate, child-centred action, involving young people in safety planning wherever possible.

In some cases, adults may request access to a young person's device where there is a clear safeguarding concern. If access is refused or concerning content is found, decisions are made

with management oversight and in line with legal and safeguarding guidance. Where appropriate, this may include consultation with the police, children's social care, or other relevant agencies.

Our proactive, relationship-based approach supports young people to stay safe, make informed choices, and develop the skills to navigate relationships, both offline and online with confidence and respect.

**Procedure**

At Cameron and Cooper Limited, we take all reports of bullying seriously and respond promptly and proportionately. Every young person is supported to understand the expected standards of behaviour from the point of admission, including clear information within the Children's Guide and through ongoing key adult sessions.

When a concern about bullying is raised, adults will act without delay. The young person raising the concern will be listened to, supported, and reassured that they have done the right thing in speaking up. Adults will gather information in a sensitive and proportionate way, taking account of the young person's wishes and the context of the concern.

Investigations may involve:

- Speaking with those directly involved, including any young people or adults who witnessed or were affected by the behaviour.
- Reviewing relevant written or digital records, where appropriate and lawful.
- Consulting with the Registered Manager or senior staff to agree next steps, especially where there are safeguarding implications.

Following initial information gathering, adults will respond in a way that:

- Centres the safety, well-being, and voice of the young person who has been affected.
- Seeks to understand and address the underlying causes of the bullying behaviour.
- Uses restorative approaches wherever possible to rebuild relationships and accountability.
- Ensures that behaviour support plans or risk assessments are updated in light of any new information.

If the incident involves a serious safeguarding concern or may constitute a criminal offence, the Safeguarding and Child Protection Policy will be followed. This may involve referral to external agencies such as children's social care or the police.

All incidents will be recorded on ClearCare, with management oversight and review to ensure responses are consistent, proportionate, and focused on learning.

**Supporting the Young Person Affected by Bullying**

At Cameron and Cooper Limited, the safety, dignity, and emotional well-being of young people is our highest priority. When an incident of bullying is witnessed or reported, adults must respond immediately to support the young person affected.

This includes checking in with them at the time of the incident, offering reassurance, and making sure they feel safe and heard. Adults must remain calm, non-judgemental, and present, providing the young person with space to express how they feel.

Support does not end with the initial response. Adults will follow up with the young person later that day or in the following days, depending on their needs. This gives the young person time to process the incident and lets them know that they remain a priority beyond the moment itself.

As part of this response:

- Emotional support and guidance will be offered through key adult time or another trusted relationship.
- Adults will ensure the young person understands that what happened is not their fault and that they will not be blamed.
- The young person's views will shape any next steps, including whether restorative work is appropriate and how it should take place.
- Any safeguarding concerns will be addressed in line with the Safeguarding and Child Protection Policy.

Adults will also:

- Record the incident clearly on ClearCare, including the young person's views and any actions taken.
- Inform the shift leader or relevant senior as soon as possible to ensure oversight and consistency.
- Revisit and, if necessary, update the young person's Behaviour Support Plan or Risk Assessment.

The young person will be supported to understand that restorative practice is not about blame or punishment, but about healing, understanding, and creating a safer and more respectful environment for everyone. Adults must also be clear that retaliation is not appropriate and that the adult team is there to take action on their behalf.

Our goal is to ensure that every young person affected by bullying feels safe, respected, and supported to recover, rebuild confidence, and continue to thrive.

**Recording**

At Cameron and Cooper Limited, adults are responsible for maintaining clear and accurate records to ensure bullying is monitored effectively and persistent behaviours are addressed with the right support.

All incidents of bullying must be recorded on ClearCare within 24 hours. The official Bullying Form should also be completed to capture key information, including the circumstances, individuals involved, actions taken, and the views of the young people. The form includes space to record young people's comments, any support offered, and whether a key working session has been triggered.

Young people should be encouraged to contribute their views as part of a restorative process. Where they decline to do so, this must be noted clearly with an explanation. Adults must record all incidents, even those resolved immediately, to ensure patterns can be identified and appropriate support is provided.

Bullying logs are reviewed regularly by the Home Managers and the Senior Management Team. This enables oversight of any recurring issues and ensures that timely action is taken to address both relational harm and safeguarding concerns.

We are committed to recognising and reinforcing positive change. When young people begin to move away from harmful behaviours and show growth, this should be acknowledged and celebrated as part of our wider culture of Love, Care, and Consistency.

**Monitoring Arrangements**

At Cameron and Cooper Limited, the implementation and effectiveness of this policy are closely monitored to ensure it remains responsive, consistent, and aligned with safeguarding expectations.

The Responsible Individual will oversee the review and ongoing development of this policy, ensuring that it reflects current legislation, guidance, and best practice. Reviews will take place at least annually, with additional updates made if circumstances, practice, or statutory guidance change.

The Senior Leadership Team will monitor the application of this policy across the organisation, reviewing data from bullying records, restorative interventions, and safeguarding reports to ensure that practice remains consistent and effective.

Within the education setting, the Head of school is responsible for embedding the policy within the school curriculum and pastoral system. This includes promoting awareness of bullying, delivering key PSHE content, and ensuring that incidents are identified and addressed swiftly.

In the homes, Home Managers are responsible for ensuring that all adults are familiar with the policy, confident in applying it, and proactive in addressing concerns. They will oversee the use of the bullying form, lead regular reviews of recorded incidents, and ensure that any themes are responded to through staff development or practice discussions.

Through this joined-up approach, Cameron and Cooper Limited maintains high standards of oversight and ensures that all young people feel safe, seen, and supported.