Preventing and Tackling Bullying Policy

Effective from: August 2025
Last reviewed: August 2026
Next review due: August 2027

KING'S COLLEGE SCHOOL
PANAMA

School Ethos

King's College School Panama is committed to providing a safe, respectful and inclusive environment in which bullying in any form is not tolerated.

We recognise that bullying can have a serious and lasting impact on a child's wellbeing, relationships, learning and personal development. Preventing and responding effectively to bullying is therefore an important part of the School's safeguarding, pastoral and behavioural culture.

Our approach is guided by the following principles:

- we promote positive relationships and a culture of kindness, respect and inclusion throughout School life;
- we create an environment in which pupils feel confident to report concerns, knowing that they will be listened to and taken seriously;
- we recognise that some pupils may be more vulnerable to bullying and ensure appropriate support is provided;
- we act promptly, proportionately and consistently when harmful behaviour is identified;
- we distinguish carefully between bullying, conflict, isolated unkind behaviour and safeguarding concerns;
- we work in partnership with parents and guardians;
- we teach pupils to recognise harmful behaviour, seek help and act as positive upstanders; and
- we review patterns, trends and practice regularly to strengthen prevention and intervention.

Every pupil should feel safe, respected and able to participate fully in the life of the School.

Policy Objectives

This policy explains how King's College School Panama prevents, identifies and responds to bullying involving pupils.

The School aims to:

- prevent bullying wherever reasonably possible;
- ensure pupils understand what bullying is and how to report it;
- respond promptly and fairly to reported concerns;
- protect and support pupils who experience bullying;
- address the behaviour and needs of pupils who engage in bullying;
- recognise when bullying may constitute child-on-child abuse or another safeguarding concern;
- address online and technology-facilitated bullying as seriously as face-to-face behaviour;
- identify patterns and emerging risks; and
- maintain an anti-bullying culture across the whole School.

Scope

This policy applies to all pupils at King's College School Panama, including Early Years, Primary and Secondary.

It applies to bullying:

- on the School premises;
- during the School day;
- on School transport;
- during educational visits, residential trips, sporting events and co-curricular activities;
- during any activity organised or authorised by the School; and
- outside School or online where the behaviour affects the safety, welfare, relationships or education of pupils or has a material connection with School life.

The policy principally addresses bullying between pupils. Concerns involving the bullying or harassment of adults will be managed through the appropriate Behaviour Policy, Staff Code of Conduct, Human Resources, safeguarding, grievance or complaints procedures.

Definition of Bullying

Bullying is normally understood as behaviour by an individual or group that is:

- intended to hurt, intimidate, humiliate or exclude another person;
- repeated over time or forms part of a pattern; and
- characterised by a real or perceived imbalance of power.

The imbalance of power may arise from age, physical strength, social status, popularity, group size, access to information or images, technology, vulnerability or another characteristic.

Bullying may occur face-to-face, online or through a combination of both.

It may include:

- physical aggression;
- threats or intimidation;
- name-calling, taunting or insulting behaviour;
- deliberate exclusion;
- spreading rumours;
- humiliation;
- coercion or manipulation;
- interfering with possessions;
- discriminatory behaviour;
- sexualised behaviour;
- misuse of images, messages or personal information; or
- repeated harmful behaviour through digital platforms.

Intent and Impact

Both intent and impact must be considered when responding to harmful behaviour.

Bullying will normally involve repeated behaviour and an imbalance of power. However, a serious one-off incident may still constitute harmful behaviour, child-on-child abuse, harassment, sexual violence or another safeguarding concern and will be addressed accordingly.

The absence of an intention to cause harm does not prevent the School from taking appropriate action.

Distinguishing Bullying from Conflict and Other Harmful Behaviour

Not all disagreement, conflict or unkind behaviour constitutes bullying.

A one-off disagreement, friendship difficulty or isolated unkind act will not normally be classified as bullying where there is no pattern or imbalance of power. Such behaviour will nevertheless be addressed appropriately under the Behaviour Policy.

A serious one-off incident may constitute child-on-child abuse, harassment, violence or another safeguarding concern even where it does not meet the definition of bullying.

Where safeguarding thresholds are met or suspected, the Safeguarding and Child Protection Policy takes precedence.

Forms of Bullying

Bullying can happen to any pupil.

It may include behaviour related to:

- race, ethnicity, nationality, language or culture;
- religion or belief;
- sex or gender;
- sexual orientation;
- disability or special educational needs;
- physical appearance;
- physical or mental health;
- family circumstances;
- socioeconomic circumstances;
- caring responsibilities;
- nationality or immigration background; or
- any other actual or perceived difference.

Physical Bullying

Including:

- hitting;
- kicking;
- pushing;
- damaging property;
- taking possessions; or
- threatening physical harm.

Verbal Bullying

Including:

- name-calling;
- insults;
- threats;
- offensive comments;
- ridicule;
- humiliating remarks; or
- repeated prejudicial language.

Social or Relational Bullying

Including:

- deliberate exclusion;
- manipulation of friendships;
- spreading rumours;
- public humiliation;
- coercion;
- intimidation;
- encouraging others to exclude someone; or
- deliberately damaging another pupil's social relationships or reputation.

Discriminatory Bullying

Including bullying, prejudicial language or harassment related to a person's actual or perceived race, ethnicity, nationality, religion or belief, disability, sex, sexual orientation, identity, family circumstances or other personal characteristic.

This may include racist, homophobic, transphobic, sexist, ableist or other prejudicial language or behaviour.

Discriminatory behaviour may require intervention even where it is a one-off incident and does not meet the definition of bullying.

Sexual or Sexist Bullying

Including:

- sexualised comments;
- sexual harassment;
- unwanted sexualised attention;
- abusive sexual language;
- misogynistic or other sex-based abuse;
- sexual rumours;
- inappropriate sharing or manipulation of images; or
- other behaviour of a sexual nature intended to humiliate, intimidate or harm.

Where behaviour constitutes sexual harassment, sexual violence or harmful sexual behaviour, it will be treated as a safeguarding matter.

Cyberbullying and Technology-Facilitated Abuse

Cyberbullying includes bullying conducted through:

- messaging services;
- social media;
- online games;
- group chats;
- email;
- websites;
- shared documents;
- image-sharing services; or
- any other digital platform.

Technology-facilitated bullying may include:

- abusive or threatening messages;
- deliberate online exclusion;
- impersonation;
- spreading rumours;
- sharing private information;
- sharing humiliating images or recordings;
- coordinated online harassment;
- creation or distribution of manipulated images;
- AI-generated impersonation;
- deepfakes;
- deep nudes or sexualised AI-generated imagery; or
- using generative AI to create harmful, false or humiliating content about another person.

All incidents involving nude or semi-nude imagery involving a person under 18 require a safeguarding response and must be

managed in accordance with the Safeguarding and Child Protection Policy and Sharing Nudes and Semi-Nudes Policy.

Bullying as Child-on-Child Abuse

Bullying may constitute child-on-child abuse.

The School recognises that abuse between children may occur inside or outside School and online.

A bullying concern will be treated as a safeguarding matter where there is:

- significant or escalating harm;
- sexual harassment or sexual violence;
- harmful sexual behaviour;
- coercion or exploitation;
- serious physical violence;
- discriminatory abuse of a serious nature;
- sustained intimidation;
- significant emotional harm;
- sharing or creation of sexual imagery;
- risk of criminal behaviour; or
- any other indication that a child may be at risk of harm.

Staff must never dismiss harmful behaviour as "banter", "having a laugh", "part of growing up" or normal friendship behaviour.

Legislation and Guidance

King's College School Panama operates within the legal and regulatory framework of Panama.

This policy is informed by:

- applicable Panamanian legislation relating to the protection, welfare and rights of children;
- relevant MEDUCA requirements;
- the Standards for British Schools Overseas;
- Keeping Children Safe in Education 2026, adopted by the School as a British safeguarding benchmark where compatible with Panamanian law and the international context;
- Department for Education guidance, *Preventing and Tackling Bullying*;
- relevant Inspired Education safeguarding and behaviour requirements; and
- recognised international best practice in bullying prevention, safeguarding and online safety.

UK legislation and guidance may inform the School's approach as recognised British best practice but do not create statutory powers or duties for King's College School Panama under English law.

Where there is any conflict between overseas guidance and applicable Panamanian law, Panamanian law takes precedence.

Related Policies

This policy should be read alongside:

- Safeguarding and Child Protection Policy;
- Whole School Behaviour Policy;
- Online Safety Policy;
- Acceptable Use of Technology Policy;
- Mobile Phones and Personal Smart Devices Policy;

- Sharing Nudes and Semi-Nudes Policy;
- Inclusion Policy;
- PSHE Policy;
- Relationships Education, Relationships and Sex Education and Health Education Policy;
- Data Protection Policy;
- Searching and Confiscation procedures; and
- Complaints Policy.

Roles and Responsibilities

Preventing bullying and responding effectively when it occurs is a shared responsibility.

Designated Safeguarding Lead

The DSL has lead responsibility for safeguarding and child protection. Routine bullying concerns will normally be managed through the School's pastoral and behaviour structures. The DSL will provide oversight or take the lead where a bullying concern raises safeguarding issues or may constitute child-on-child abuse.

In relation to bullying, the DSL:

- provides safeguarding advice and oversight;
- ensures concerns with safeguarding implications are identified and managed appropriately;
- oversees or advises on serious child-on-child concerns;
- ensures appropriate safeguarding recording and escalation;
- monitors safeguarding patterns and trends;
- liaises with parents and external agencies where required; and
- ensures the School's response aligns with the Safeguarding and Child Protection Policy.

The Designated Safeguarding Lead is **Zoe Pett**.

Senior Leadership Team

The Senior Leadership Team:

- ensures effective implementation of this policy;
- promotes a consistent whole-school approach;
- monitors the effectiveness of prevention and intervention;
- ensures staff receive appropriate training;
- reviews significant incidents and emerging trends; and
- ensures appropriate pastoral, behavioural and safeguarding resources are available.

Heads of Section and Pastoral Leaders

Heads of Section and pastoral leaders have operational responsibility for routine bullying concerns within their areas.

They:

- ensure concerns are investigated fairly and promptly;
- coordinate support and interventions;
- communicate with parents where appropriate;
- apply or recommend appropriate consequences;
- identify patterns of concern;
- ensure appropriate follow-up; and
- escalate safeguarding matters to the DSL.

Teaching and Support Staff

All staff are expected to:

- model respectful behaviour;
- remain vigilant to signs of bullying and peer conflict;
- intervene appropriately when harmful behaviour occurs;
- listen carefully to pupils who raise concerns;
- report safeguarding concerns without delay;
- record relevant safeguarding concerns promptly on iSAMS Wellbeing Manager;
- record behavioural incidents through the appropriate School system;
- avoid minimising harmful behaviour; and
- help create an environment in which pupils feel safe to speak.

Pupils

Pupils are expected to:

- treat others with respect;
- avoid behaviour that humiliates, excludes or harms others;
- report bullying they experience or witness;
- seek adult help where another pupil may be at risk;
- behave responsibly online;
- avoid forwarding or amplifying harmful material;
- cooperate honestly with School investigations; and
- act as positive upstanders wherever it is safe to do so.

Parents and Guardians

Parents and guardians are expected to:

- reinforce respectful behaviour at home and online;
- report concerns to the School promptly;
- avoid escalating pupil disputes through social media or parent group chats;
- preserve relevant evidence of online bullying where appropriate;
- work constructively with the School;
- support reasonable interventions and consequences; and
- encourage their child to report concerns rather than retaliate.

Reporting Bullying

Pupils may report bullying to any trusted adult.

This may include:

- a class teacher;
- form tutor;
- Head of Year;
- Head of Section;
- pastoral leader;
- counsellor;
- DSL or DDSL; or
- another trusted member of staff.

A pupil does not need to prove that bullying has occurred before raising a concern.

Pupils who witness bullying are also encouraged to report it.

Reports will be taken seriously and handled sensitively.

Reporting by Parents and Guardians

Parents or guardians who are concerned that their child may be experiencing bullying should report the concern promptly to the child's Class Teacher, Form Tutor, Head of Year or Head of Section. Where the concern involves a safeguarding risk, they may also contact the DSL directly.

Parents should provide relevant factual information and any available evidence but should not investigate the matter themselves or directly confront another pupil.

Responding to Bullying

1. Immediate Response

Any member of staff who witnesses or receives a report of bullying will:

- ensure immediate safety;
- listen carefully;
- provide reassurance;
- avoid making premature judgements;
- establish whether urgent safeguarding action is required; and
- report the concern to the appropriate pastoral or safeguarding lead.

2. Initial Assessment

The relevant pastoral leader, Head of Section or DSL will consider:

- the nature of the behaviour;
- whether it appears repeated or patterned;
- any imbalance of power;
- the impact on the pupil;
- age and developmental stage;
- SEND or other vulnerabilities;
- whether discriminatory behaviour is involved;
- whether there is an online element;
- whether other pupils may be affected;
- whether the behaviour may constitute child-on-child abuse; and
- whether immediate protective measures are required.

The DSL must be informed where safeguarding concerns are present.

3. Investigation

The School will establish the facts fairly and proportionately.

This may include:

- speaking separately with the pupils involved;
- speaking with witnesses;

- reviewing relevant records;
- reviewing appropriate digital evidence;
- speaking with relevant staff;
- considering previous incidents or patterns; and
- contacting parents or guardians where appropriate.

Pupils will be given an appropriate opportunity to explain their perspective.

Investigations should avoid unnecessary repetition of a pupil's account or questioning that could compromise a safeguarding or external investigation.

4. Outcome and Action

Following the investigation, the School will determine:

- whether bullying occurred;
- whether other harmful behaviour occurred;
- whether safeguarding action is required;
- what support is needed;
- what behavioural consequences are appropriate; and
- what follow-up and monitoring are required.

Sanctions will be applied in accordance with the Behaviour Policy and will take account of:

- seriousness;
- frequency;
- intent;
- impact;
- age;
- vulnerability;
- power imbalance;
- previous behaviour; and
- any aggravating or mitigating circumstances.

Safeguarding action and disciplinary action are separate processes. A safeguarding response will not be replaced by a disciplinary consequence.

5. Follow-Up

A named member of staff will be responsible for follow-up after a substantiated bullying concern.

At an appropriate interval, the School will check that:

- the bullying behaviour has stopped;
- the pupil who experienced the bullying feels safe;
- agreed support remains effective;
- there has been no retaliation;
- there has been no recurrence; and
- any behavioural or pastoral intervention is having the intended impact.

Where concerns continue, the response and support plan will be reviewed and escalated as necessary.

Support for Pupils Who Experience Bullying

Support may include:

- reassurance and access to a trusted adult;
- regular pastoral check-ins;
- counselling;
- a safety or support plan;
- adjustments to supervision or routines;
- support with online safety;
- support rebuilding confidence and peer relationships;
- communication with parents or guardians;
- academic support where learning has been affected; or
- referral to external professional support where appropriate.

The School will follow up concerns to establish whether the bullying has stopped and whether further support is required.

Pupils Who Engage in Bullying Behaviour

A pupil who has bullied another pupil will be held accountable for their behaviour while also being supported to change it.

Intervention may include:

- appropriate consequences;
- discussion of the impact of the behaviour;
- pastoral intervention;
- parental involvement;
- behaviour support;
- education relating to respectful relationships or online behaviour;
- counselling;
- monitoring;
- restorative work where appropriate; or
- external professional support.

A pupil who engages in bullying behaviour may themselves have safeguarding, wellbeing or additional support needs. These will be considered separately from accountability for their behaviour.

Restorative Approaches

Restorative approaches may be used where they are safe, appropriate and likely to support positive change.

They will:

- never replace safeguarding action;
- never replace appropriate consequences;
- not be imposed on a pupil who has experienced harm;
- only take place when relevant pupils feel safe to participate;
- only be used where any power imbalance can be safely managed; and
- be facilitated by an appropriate member of staff.

No pupil will be expected to reconcile with another pupil as a condition of resolving a bullying concern.

Cyberbullying

Cyberbullying will be treated with the same seriousness as face-to-face bullying.

The School may:

- support pupils to preserve relevant evidence;
- review use of School-owned devices and systems where appropriate;
- work with parents;
- contact online platforms or service providers;
- request removal of harmful content;
- apply behavioural consequences;
- provide online-safety support;
- involve the DSL where safeguarding risks exist; or
- involve Panamanian authorities where appropriate.

Staff must not routinely view, download, copy or forward nude or semi-nude images involving a person under 18.

Any search, inspection or confiscation of a pupil's electronic device must be undertaken in accordance with applicable Panamanian law, the Behaviour Policy and the School's approved searching and confiscation procedures.

Incidents Outside School

The School may respond to bullying occurring outside the School premises or outside School hours where the behaviour:

- affects the welfare or safety of a pupil;
- affects relationships or behaviour within School;
- damages the orderly operation of the School;
- involves members of the School community;
- occurs online; or
- otherwise has a material connection with School life.

Responses may include pastoral support, safeguarding action and behavioural consequences where appropriate.

Where external criminal or child-protection concerns arise, the School may involve SENNIAF, the police or another appropriate Panamanian authority.

Preventing Bullying

Prevention is a central part of the School's approach.

School Culture

The School will:

- promote respectful relationships;
- challenge prejudicial and discriminatory behaviour;
- maintain clear behavioural expectations;
- promote positive pupil leadership;
- create trusted relationships between pupils and adults;
- ensure vulnerable pupils have appropriate support;
- encourage positive bystander and upstander behaviour; and
- reinforce that bullying is never normal or acceptable.

Curriculum and Education

Pupils will learn about:

- respectful relationships;
- friendship and conflict;

- bullying and discrimination;
- consent and personal boundaries;
- healthy online relationships;
- cyberbullying;
- digital citizenship;
- image sharing;
- harmful and manipulated content;
- misinformation and disinformation;
- generative AI;
- reporting concerns; and
- seeking help.

This education may be provided through:

- PSHE;
- Relationships Education and RSE;
- assemblies;
- tutor programmes;
- curriculum subjects;
- pastoral programmes; and
- age-appropriate online-safety education.

Pupil Voice

The School will gather pupil voice regularly to understand:

- pupils' sense of safety;
- where bullying may occur;
- barriers to reporting;
- online risks;
- peer-group dynamics; and
- the effectiveness of School responses.

Pupil voice will inform pastoral and safeguarding improvement.

Record Keeping

Bullying concerns and incidents must be recorded through the School's appropriate pastoral or behaviour recording system.

Where a bullying concern raises a safeguarding issue or may constitute child-on-child abuse, the safeguarding concern must also be recorded promptly on iSAMS Wellbeing Manager in accordance with the Safeguarding and Child Protection Policy.

Staff should avoid unnecessary duplication of sensitive safeguarding information across systems. Records must be factual, proportionate, secure and appropriately restricted.

Records should include:

- relevant facts;
- pupils involved;
- the nature of the concern;
- actions taken;
- decisions reached;
- support provided;
- consequences where appropriate;

- communication with parents;
- safeguarding considerations; and
- follow-up.

Records must distinguish clearly between allegation, established fact and professional judgement.

Monitoring and Review

The School will monitor the effectiveness of this policy through:

- behaviour records;
- safeguarding records;
- bullying incident data;
- pupil voice;
- pastoral information;
- parent concerns;
- staff feedback;
- online-safety incidents; and
- analysis of patterns and trends.

Particular attention will be given to:

- repeated incidents;
- discriminatory bullying;
- sexualised behaviour;
- online bullying;
- pupils experiencing repeated victimisation;
- locations or times associated with increased risk; and
- evidence of harmful peer cultures.

Significant concerns and trends will be reviewed through the School's safeguarding and leadership structures and, where required, through Inspired Education governance arrangements.

This policy will be reviewed annually or earlier where required by:

- changes in Panamanian law;
- revisions to BSO standards;
- changes to safeguarding guidance;
- changes to Inspired Education requirements;
- emerging technological risks;
- significant incidents; or
- lessons learned from monitoring and review.

Supporting Guidance

The School draws on guidance and resources from recognised organisations including:

- Anti-Bullying Alliance;
- UK Safer Internet Centre;
- Childnet International;
- appropriate Panamanian safeguarding authorities; and
- relevant Inspired Education safeguarding guidance.

Appendix 1: Student Guide to Preventing and Tackling Bullying

What Is Bullying?

Bullying is when someone repeatedly hurts, intimidates, humiliates or excludes another person and there is an imbalance of power.

It can be:

- physical;
- verbal;
- social;
- discriminatory;
- sexualised; or
- online.

Bullying can happen face-to-face or through phones, social media, games, group chats or other digital platforms.

What Is Not Normally Bullying?

Not every disagreement or unkind act is bullying.

Examples may include:

- an accident;
- a one-off disagreement;
- a friendship falling out;
- an isolated unkind comment; or
- a joke that everyone genuinely finds funny.

However, serious or hurtful behaviour will still be addressed even when it is not classified as bullying.

If you are unsure, tell an adult.

What Should I Do if I Experience Bullying?

- Tell a trusted adult as soon as possible.
- Speak to your teacher, tutor, Head of Year, Head of Section, counsellor or another adult you trust.
- Explain what has happened as clearly as you can.
- Keep screenshots or messages if the concern is online, but do not forward harmful material.
- Do not retaliate.
- Ask for help if you feel unsafe.

You will be listened to and your concern will be taken seriously.

What Should I Do if I Witness Bullying?

Do not encourage it, laugh at it, share it or forward it.

Where it is safe to do so:

- support the person being targeted;
- challenge unkind behaviour appropriately;
- do not amplify harmful online content; and
- tell a trusted adult.

Being an **upstander** means taking safe and positive action when someone else needs help.

What Will the School Do?

The School will:

- listen to you;
- make sure you are safe;
- establish what happened;
- speak with the people involved;
- involve parents where appropriate;
- provide support;
- take appropriate action;
- address harmful behaviour; and
- follow up to make sure the situation improves.

If You Have Bullied Someone

The School will expect you to take responsibility for your behaviour.

We will:

- listen to your account;
- help you understand the impact of your actions;
- involve your parents where appropriate;
- provide support to help the behaviour change;
- apply consequences where necessary; and
- consider appropriate ways of repairing harm.

Making a mistake does not remove your responsibility for it, but everyone can learn and make better choices.