Anti-Bullying Policy

Preventing and Tackling Bullying for the whole school, including the EYFS

The British International School, Belgrade (BIS) is committed to safeguarding and promoting the welfare of children and expects all staff and volunteers to share this commitment.

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BRITISH INTERNATIONAL SCHOOL

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Rationale

At BIS we respect every child's need for, and rights to, an environment where safety, security, praise, recognition and opportunity for taking responsibility are available.

Bullying of any kind is unacceptable in our school. The anti-bullying policy ensures that all our children can learn in a supportive, caring and safe environment without fear of being bullied. If bullying does occur, all students should know that any incidents will be dealt with promptly and effectively. We are a TELLING school which means that anyone who knows that bullying is happening is expected to tell the staff or parents.

This policy forms part of BIS Belgrade's whole-school safeguarding and behaviour framework. It is designed to meet the British Schools Overseas (BSO) Standards, in particular Standard 16 (Preventing bullying), which requires a proactive and effective anti-bullying strategy, accessible and effective reporting systems for children, and effective action when bullying occurs. It has regard, where relevant and appropriate to the international context, to Keeping Children Safe in Education (KCSIE) 2026; Working Together to Safeguard Children 2026; Preventing and Tackling Bullying (DfE, 2017, current publication); Behaviour in Schools; the revised Relationships Education, Relationships and Sex Education (RSE) and Health Education statutory guidance for introduction from 1 September 2026; Mobile Phones in Schools statutory guidance for schools to follow from 1 September 2026; Searching, Screening and Confiscation guidance; and UKCIS advice on sharing nudes and semi-nudes (updated 2024). The policy must be read alongside the BIS Safeguarding & Child Protection Policy 2026-2027, E-Safety Policy 2026-2027, Primary and Secondary Behaviour Policies, RSE/PSHE policies, SEND arrangements, Staff Code of Conduct, Complaints Procedure and other related school policies. BIS operates in Serbia: applicable Serbian law and competent-authority requirements take precedence where they differ from UK guidance adopted by the school as a good-practice framework.

What is Bullying?

As defined by the DfE guidance "Preventing and Tackling Bullying" July 2017, bullying is:

"Behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, special educational needs or disabilities, or because a child is adopted, in care or has caring responsibilities. It might be motivated by actual differences between children, or perceived differences."

Bullying commonly involves an actual or perceived imbalance of power. This may be physical, psychological, social, technological or related to age, development, popularity, vulnerability, access to a group or information, or the ability to isolate another person. Online behaviour can intensify this imbalance because harmful content can be shared rapidly, repeatedly and to a wide audience.

Harmful, discriminatory, sexualised or intimidating behaviour must not be dismissed as "banter", "just having a laugh", "part of growing up" or similar. A single incident may not meet the definition of bullying, but it may still be serious harmful behaviour or child-on-child abuse and must be addressed under the Behaviour and/or Safeguarding & Child Protection Policy as appropriate.

Although bullying can occur between individuals, it often takes place in the presence of others who may also join in or who become 'bystanders'.

Bullying can be:

- **Verbal** - e.g. name calling, taunting, mocking, making offensive comments (including comments related to any protected characteristics and sexually abusive comments).
- **Physical** - e.g. kicking; hitting; biting, hair pulling, taking belongings; producing offensive graffiti, sexual violence.
- **Emotional** - e.g. gossiping; excluding people from groups and spreading hurtful and untruthful rumours.
- **Cyber bullying -** This includes the same unacceptable behaviours expressed online, sometimes called online bullying or cyberbullying. This can include: sending offensive, upsetting and inappropriate messages by phone, text, instant messenger, through gaming, websites, social media sites and apps, and sending offensive or degrading photos or videos.

Child-on-Child Abuse (including harassment and violence)

BIS Belgrade recognises that children can abuse, harass or harm other children and that this can occur **inside or outside school and online**. Child-on-child abuse is a safeguarding concern and must never be dismissed as "banter", "just having a laugh", "part of growing up" or similar behaviour. The absence of reported incidents must not be taken as evidence that child-on-child abuse is not occurring. Child-on-child abuse may include, but is not limited to:

- bullying, including cyberbullying, prejudice-based and discriminatory bullying;
- physical abuse;
- harassment, intimidation, threats, coercion or controlling behaviour;
- abuse within intimate personal relationships between children;
- sexual violence and sexual harassment;
- harmful sexual behaviour;
- causing someone to engage in sexual activity without consent;
- consensual or non-consensual sharing of self-generated intimate images and/or videos, including those generated or manipulated using artificial intelligence, such as deepfakes;
- upskirting;
- initiation or hazing-type violence and rituals; and
- harmful behaviour through social media, messaging services, gaming platforms, group chats or other digital technologies.

Bullying is one of the behaviours that may constitute child-on-child abuse. However, not every disagreement, friendship difficulty or isolated incident between children will constitute bullying or child-on-child abuse. The School will consider the nature and context of the behaviour, the harm caused or risk of harm, any imbalance of power, the ages and developmental stages of the children involved, SEND or communication needs, vulnerabilities, discriminatory factors, whether the behaviour forms part of a pattern, and any other relevant circumstances.

Importantly, **a safeguarding response does not depend on behaviour being repeated**. Although repetition and an imbalance of power are commonly relevant when determining whether behaviour meets the definition of bullying, a single incident may nevertheless constitute abuse, harassment, violence or another safeguarding concern. Staff must therefore **not wait for behaviour to become repeated or severe before raising a safeguarding concern**.

Where bullying or other harmful behaviour indicates that a child may be suffering, or may be at risk of suffering, harm, or where there are concerns involving child-on-child abuse, sexual violence or sexual harassment, harmful sexual behaviour, serious or repeated physical violence, coercion, exploitation, discriminatory abuse, significant emotional harm, intimate imagery, serious online harm or any other safeguarding risk, the concern must be reported to the **Designated Safeguarding Lead (DSL) or an appropriately trained Deputy DSL (ADSL) without delay**, in accordance with the BIS Safeguarding & Child Protection Policy. If a member of staff is unsure whether the safeguarding threshold has been met, they must seek advice from the DSL/ADSL.

The immediate priority is the **safety and welfare of the child or children involved**. The School will take appropriate steps to protect and support the child who has experienced harm and will also

consider the safeguarding and support needs of the child whose behaviour has caused harm. A child who harms another child may themselves be vulnerable or in need of support; this does not reduce the seriousness of the behaviour or the need for appropriate boundaries, safeguarding action and proportionate consequences.

BIS adopts a **zero-tolerance approach to abusive, discriminatory, sexualised, intimidating and violent behaviour**. Such behaviour will always be challenged and addressed. This does not mean that every incident will result in the same response; action will be proportionate, child-centred and based on the circumstances, the harm caused and the level of risk.

All concerns will be managed in accordance with this Anti-Bullying Policy and, where applicable, the School's **Safeguarding & Child Protection Policy, E-Safety Policy and relevant Behaviour Policy**. Safeguarding concerns will be reported, recorded and managed through the School's safeguarding procedures, including **iSAMS Well-being Manager**.

Responding to Bullying

BIS Belgrade takes all reports of bullying and harmful behaviour seriously and will respond **promptly, effectively and proportionately**. Every pupil has the right to learn in a safe, respectful and supportive environment.

The School's response will aim to:

- stop the bullying or harmful behaviour;
- ensure the immediate safety and wellbeing of the pupil or pupils involved;
- support the pupil who has experienced bullying;
- help the pupil whose behaviour has caused harm to understand the impact of their behaviour and develop more appropriate ways of behaving;
- apply appropriate and proportionate consequences where required;
- identify and address any wider peer-group, discriminatory, online or safeguarding concerns;
- prevent recurrence or retaliation; and
- refer concerns to the **DSL/ADSL without delay where there is a safeguarding concern**, in accordance with the Safeguarding & Child Protection Policy.

The School will not delay necessary safeguarding action while determining whether behaviour meets the formal definition of bullying.

Objectives of this Policy

The objectives of this Policy are to:

- ensure that pupils, staff and parents/carers understand what bullying is and recognise its different forms;
- maintain a **proactive and effective whole-school approach** to preventing bullying, including cyberbullying, prejudice-based and discriminatory bullying;
- ensure that pupils have **safe, accessible and effective ways to report bullying and seek help**;
- ensure that all staff know how to recognise, report, record and respond to bullying appropriately;
- ensure that bullying concerns are responded to promptly, consistently and proportionately;
- ensure appropriate support for pupils who experience bullying and for pupils whose behaviour has caused harm;
- ensure that bullying which raises a safeguarding concern is referred to the **DSL/ADSL without delay** and managed in accordance with the Safeguarding & Child Protection Policy;
- work in partnership with parents/carers and, where necessary, relevant external agencies and competent authorities; and
- monitor incidents and patterns of bullying so that the School can evaluate and continually improve its preventative measures and response.

Bullying, discrimination and vulnerability

BIS Belgrade is committed to providing an inclusive environment in which all pupils are treated with dignity and respect. Bullying may be motivated by actual or perceived differences between pupils and may be **prejudice-based or discriminatory**.

The School will challenge bullying, discrimination, harassment and derogatory language related to a pupil's identity, background, circumstances or perceived characteristics.

Pupils may be particularly vulnerable to bullying because of factors including, but not limited to:

- disability, Special Educational Needs and/or Disabilities (SEND), neurodiversity or communication needs;
- race, ethnicity, nationality, national origin, culture or language;
- religion or belief;
- sex;
- sexual orientation;
- gender-related prejudice or stereotyping;
- age, physical development or maturity;
- appearance;
- physical or mental health needs;
- family or home circumstances;
- socioeconomic circumstances;
- caring responsibilities;
- being new to the School, community or country; or
- any other actual or perceived difference that is used to target, exclude, humiliate or intimidate a pupil.

BIS recognises that some pupils may experience **multiple or intersecting vulnerabilities** and that bullying may have a greater impact on pupils who already experience disadvantage, isolation or barriers to communicating their concerns.

Staff must be alert to the possibility that pupils with **SEND, disabilities, communication needs or other vulnerabilities** may be disproportionately affected by bullying and may find it more difficult to recognise, report or explain what has happened. The School will make appropriate and reasonable adjustments to reporting, support and intervention arrangements according to the individual needs of the pupil.

Prejudice-based or discriminatory behaviour will be challenged and addressed even where it does not meet the School's definition of repeated bullying. Where discriminatory behaviour may constitute abuse, cause significant harm or otherwise raise a safeguarding concern, it must be reported to the **DSL/ADSL without delay** and managed in accordance with the BIS Safeguarding & Child Protection Policy.

The School's approach to discrimination and prejudice is implemented in accordance with **applicable Serbian legislation and regulations** and the School's policies. BIS also has regard to the **British Schools Overseas Standards** and relevant UK safeguarding and education guidance as a framework for good practice appropriate to the international-school context.

Signs and Symptoms

A child may not always tell an adult directly that they are being bullied. Staff and parents/carers should therefore be alert to changes in a pupil's behaviour, emotional wellbeing, relationships, attendance, learning or use of technology.

Possible signs that a pupil may be experiencing bullying include, but are not limited to, a pupil who:

- becomes reluctant or unwilling to attend school, use school transport or take part in particular lessons, activities or social situations;
- becomes withdrawn, anxious, distressed, unusually quiet or lacking in confidence;
- shows unexplained changes in mood, behaviour or emotional wellbeing;
- becomes tearful, has difficulty sleeping or experiences nightmares;
- frequently reports feeling unwell, particularly before school;
- shows an unexplained decline in attendance, engagement, concentration or academic progress;
- has belongings, clothing or equipment repeatedly damaged, lost or taken;

- has unexplained injuries or gives explanations that appear inconsistent or concerning;
- asks for, loses or takes money without a clear explanation;
- becomes isolated from friends or experiences sudden changes in friendship groups;
- appears frightened or reluctant to explain what is wrong;
- begins displaying bullying, aggressive or harmful behaviour towards other pupils or siblings;
- shows significant changes in eating or other usual routines;
- becomes unusually anxious about using a phone, device, social media, messaging service, gaming platform or other online environment;
- becomes distressed, nervous or secretive when receiving messages or notifications;
- suddenly stops using particular online platforms or changes accounts;
- shows concern about photographs, videos, messages or other content being shared online; or
- shows any other significant or unexplained change in behaviour or wellbeing.

These signs **do not necessarily mean that bullying is occurring** and may indicate other difficulties or safeguarding concerns. However, they should not be ignored. Staff should respond with professional curiosity, listen to the pupil and consider whether bullying, child-on-child abuse or another safeguarding concern may be present.

Where a member of staff has a safeguarding concern about a child, the concern must be reported to the **DSL/ADSL without delay**, in accordance with the BIS Safeguarding & Child Protection Policy. Staff should not wait for a child to make a direct disclosure before raising a safeguarding concern.

Procedures – Reporting Bullying and Harmful Behavior

BIS Belgrade aims to ensure that all pupils have **safe, accessible and effective ways to report bullying and harmful behaviour**. All reports will be taken seriously and responded to promptly and proportionately.

Pupils, staff and parents/carers are **not expected to determine whether behaviour meets the formal definition of bullying or reaches a safeguarding threshold before raising a concern**. Where there is uncertainty, the concern should still be reported.

Awareness and Education

BIS supports the reporting and prevention of bullying through the curriculum, including **PSHE, RSE, assemblies, Form Time and other age-appropriate learning opportunities**.

Pupils are taught to recognise different forms of bullying and harmful behaviour, including discriminatory and online behaviour; understand their impact on others; develop empathy and respectful relationships; recognise the role of bystanders and upstanders; and understand **how, when and to whom they can report concerns and seek help**.

More detailed preventative work is set out in the **Preventing Bullying** section of this Policy.

Children

Children are encouraged to **tell someone and seek help** if they experience, witness or become aware of bullying or other harmful behaviour.

Pupils may report a concern to **any member of staff they trust**, including their Class Teacher, Form Tutor, Key Stage Coordinator, Head of Primary, Head of Secondary, DSL/ADSL or another trusted adult in School. They may also speak to a parent/carer or another trusted adult who can help them report the concern to the School.

Pupils should report behaviour that makes them or another pupil feel unsafe, threatened, intimidated, humiliated, excluded, discriminated against or repeatedly upset, even if they are unsure whether it constitutes bullying.

Children who witness bullying or harmful behaviour are encouraged to be **upstanders** by reporting what they have seen or heard to a trusted adult. They should not place themselves at risk by intervening physically or engaging with harmful behaviour online.

BIS recognises that some pupils may find it more difficult to report concerns. The School will provide **age-appropriate and accessible reporting opportunities and make appropriate adjustments for pupils with SEND, disabilities, communication needs, language barriers or other vulnerabilities**.

A pupil will not be punished or disadvantaged for making a bullying or safeguarding report **in good faith**, even where it is later determined that the behaviour did not meet the definition of bullying.

Staff

All staff have a responsibility to help prevent, recognise and respond to bullying and harmful behaviour.
Staff should:

- listen calmly and carefully when a concern is raised;
- take all reports seriously;
- reassure pupils that they were right to report the concern;
- make an accurate and factual record;
- challenge bullying, discrimination, harassment and derogatory or abusive behaviour;
- remain alert to pupils who may be vulnerable or who may find it difficult to report concerns; and
- follow the School's reporting, behaviour and safeguarding procedures.

Bullying, discrimination, harassment or abusive behaviour must not be dismissed as **"banter", "just having a laugh", "part of growing up" or similar behaviour**.
Staff should remain alert to bullying and harmful behaviour during lessons, breaks, lunchtimes, transitions, School transport, trips, activities and online where this affects pupils or the School community.
Concerns should be passed promptly to the relevant **Class Teacher, Form Tutor, Key Stage Coordinator, Head of Primary, Head of Secondary or other appropriate member of the Senior Leadership Team, in accordance with the School's pastoral and management structure.**
Where behaviour **raises or may raise a safeguarding concern**, it must be reported to the **DSL/ADSL without delay**, in accordance with the BIS Safeguarding & Child Protection Policy.

Initial Information and Evidence
When a concern is reported, staff should make an **accurate, factual record** of what has been reported, witnessed or disclosed, including, where relevant, dates, times, locations, persons involved and any available supporting information.
Where appropriate, relevant evidence should be **preserved rather than deleted**. This may include messages, emails, usernames, photographs, videos, screenshots or other information that may assist the School in establishing what has occurred.
Staff should not ask pupils to repeatedly recount an incident or conduct an extensive investigation before the concern has been appropriately referred.
Where evidence involves **intimate imagery, potentially illegal content or another safeguarding concern**, staff must not intentionally view, copy, download, forward or otherwise distribute the material and must seek advice from the **DSL/ADSL without delay**, in accordance with the BIS Safeguarding & Child Protection Policy and E-Safety Policy.
Detailed procedures relating to online incidents and online evidence are set out in **Procedures – Responding to Cyberbullying and Online Harm**.

Parents/Carers

Parents/carers are encouraged to report concerns about bullying or harmful behaviour as early as possible to the pupil's **Class Teacher, Form Tutor, Key Stage Coordinator, Head of Primary/Secondary or another appropriate member of staff**.
Safeguarding concerns may be raised directly with the **DSL/ADSL**.
The School will work in partnership with parents/carers when responding to bullying, while maintaining appropriate confidentiality and protecting the privacy and safeguarding information of all pupils involved.
Parents/carers who have concerns about the way a bullying matter has been handled may raise these through the School's **Complaints Procedure**.

Bullying Outside School and Online

Bullying and harmful behaviour may occur **inside or outside School and online**.
Where behaviour involving BIS pupils outside School, including on School transport, during School-related activities or online, affects the safety, wellbeing or relationships of pupils or the safe and orderly operation of the School, BIS will consider an appropriate response in accordance with

applicable School policies and Serbian law.
Online incidents will be managed in accordance with the **Procedures – Responding to Cyberbullying and Online Harm** section of this Policy and the BIS E-Safety Policy.
Where an incident outside School or online raises a safeguarding concern, it must be reported to the **DSL/ADSL without delay**.

Procedures - Responding to Cyberbullying and Online Harm

Cyberbullying is bullying that takes place through digital technology. Online harmful behaviour may also constitute **child-on-child abuse or another safeguarding concern**, whether or not it meets the definition of repeated bullying.
Cyberbullying and online harm may occur through social media, messaging services, group chats, email, gaming platforms, websites, applications, shared documents, photographs, videos or other digital technologies and devices. It may occur both during and outside School hours.
Online harm may include, but is not limited to:

- abusive, threatening, intimidating or humiliating messages or comments;
- repeated unwanted contact or online harassment;
- spreading rumours, gossip or false information online;
- deliberate exclusion from online groups or activities where this is intended to cause harm;
- discriminatory, prejudicial or hateful content;
- impersonating another person or creating fake accounts or profiles;
- sharing, altering or distributing photographs, videos or other content in order to embarrass, humiliate, threaten or harm another pupil;
- recording or sharing incidents of bullying, violence or humiliation;
- sharing private or personal information without permission;
- coercion, threats, blackmail or exploitation using technology;
- harmful behaviour through online gaming or gaming communications;
- sexual harassment or harmful sexual behaviour online;
- consensual or non-consensual sharing of **self-generated intimate images and/or videos**;
- creating, sharing or threatening to share **AI-generated, digitally manipulated or altered intimate or harmful content, including deepfakes**; and
- encouraging, supporting or participating in harmful online behaviour, including through sharing, forwarding, commenting on or otherwise amplifying harmful content.

Responding to an Incident

When cyberbullying or online harm is reported or identified, the School will respond **promptly and proportionately**.
The School will, as appropriate:

- consider the immediate safety and wellbeing of the pupil or pupils involved;
- provide appropriate support to the pupil who has experienced the behaviour;
- consider the safeguarding and support needs of the pupil whose behaviour has caused harm;
- establish the basic facts and context of the incident;
- consider whether the behaviour forms part of a wider pattern of bullying or abuse;
- identify relevant witnesses where appropriate;
- consider whether other pupils have received, viewed, shared or been affected by the content;
- consider whether the behaviour has continued or may continue outside School;
- take reasonable steps to prevent further circulation or escalation of harmful material;
- provide appropriate advice about blocking, reporting and privacy or security settings;
- advise pupils **not to retaliate, respond to or redistribute harmful content**;
- involve relevant pastoral, safeguarding, senior leadership or IT staff where appropriate;
- apply proportionate consequences in accordance with relevant School policies; and
- arrange appropriate follow-up and monitoring.

Where online behaviour involves or may involve **child-on-child abuse, sexual violence or sexual harassment, harmful sexual behaviour, intimate imagery, coercion, exploitation, threats, serious discriminatory abuse, significant emotional harm or another safeguarding concern**, it must be

reported to the **DSL/ADSL without delay** and managed in accordance with the BIS Safeguarding & Child Protection Policy and E-Safety Policy.
Staff must not wait for online behaviour to become repeated before making a safeguarding referral where there is a risk of harm.

Preserving Evidence

Where appropriate, pupils may be encouraged to preserve relevant evidence of cyberbullying or online harm, for example by retaining messages, usernames, dates, times, URLs or other information that may assist the School in understanding what has occurred.
Screenshots may be appropriate for some forms of cyberbullying. However, **pupils, parents/carers and staff should not intentionally view, copy, download, forward or create screenshots of suspected intimate images or videos of a child** for the purpose of providing evidence.
Where intimate imagery or other potentially illegal or highly sensitive content is involved, staff must refer the matter to the **DSL/ADSL immediately** and follow the Safeguarding & Child Protection Policy and E-Safety Policy.

Devices, School Systems and Online Content

Where appropriate and lawful, the School may review relevant information available through **School-owned systems, accounts, networks or devices** in accordance with applicable Serbian law and BIS policies.
Staff must not assume that powers or procedures relating to searching or confiscating pupils' personal devices under UK legislation automatically apply in Serbia. Any action involving a pupil's personal device must be undertaken in accordance with **applicable Serbian law and School policy**, with advice from senior leadership and/or the DSL where appropriate.
The School may work with its IT staff and, where appropriate, online platforms or service providers to:

- preserve relevant technical information;
- restrict access to harmful content through School systems;
- support the reporting of harmful content;
- request or assist with the removal of content where appropriate; and
- reduce the risk of further sharing or exposure.

The School will not require a pupil to delete potentially relevant evidence before appropriate consideration has been given to whether it needs to be preserved or reported.
Intimate Imagery, AI-Generated Content and Deepfakes
Any incident involving the creation, request, possession, sharing or threatened sharing of **self-generated intimate images and/or videos involving children**, including images or videos created or manipulated using artificial intelligence, such as **deepfakes**, must be treated as a potential safeguarding concern and referred to the **DSL/ADSL without delay**.
Staff must **not intentionally view, copy, print, save, forward or otherwise distribute intimate imagery involving a child** unless there is a specific safeguarding or legal basis and this is undertaken as part of an authorised response.
The DSL/ADSL will determine the appropriate safeguarding response in accordance with the BIS Safeguarding & Child Protection Policy, E-Safety Policy, applicable Serbian law and, where appropriate, relevant safeguarding guidance.

External Reporting and Support

Where cyberbullying or online harm may involve a criminal offence, significant risk of harm, exploitation or another matter requiring external intervention, the DSL and/or School leadership will consider whether the matter should be referred to the **competent Serbian authorities or other appropriate services**, in accordance with applicable Serbian law and safeguarding procedures.
The School may also support pupils and parents/carers in using appropriate platform reporting and content-removal mechanisms.

Education and Prevention

BIS will provide pupils with age-appropriate education about cyberbullying and online harm through

PSHE, RSE, E-Safety education, assemblies, Form Time and other relevant curriculum and pastoral opportunities.
This will include, as appropriate:

- respectful and responsible online communication;
- recognising and reporting cyberbullying and online abuse;
- privacy and the responsible sharing of personal information;
- the risks associated with sharing photographs and videos;
- consent and appropriate online relationships;
- the potential permanence and reach of online content;
- responsible use of social media, messaging and gaming platforms;
- how to block and report harmful users or content;
- the role of bystanders and upstanders online;
- the risks associated with manipulated and AI-generated content, including deepfakes; and
- how and where pupils can seek help if something happens online.

BIS will reinforce the principle that **online behaviour is subject to the same expectations of respect, safety and responsibility as behaviour offline**.

Procedures – Outcomes

The School's response will aim to stop the bullying, ensure the safety and wellbeing of the pupils involved, address the behaviour that has caused harm and reduce the likelihood of recurrence. Outcomes will be determined on a case-by-case basis and will be appropriate and proportionate to the nature, seriousness and circumstances of the behaviour.

Pupil Who Has Experienced Bullying

The pupil who has experienced bullying will be listened to, reassured and provided with appropriate support. The School will take steps to stop the behaviour and help the pupil feel safe and secure in School.
Depending on the circumstances, support may include:

- regular opportunities to speak with a trusted member of staff;
- pastoral and/or counselling support;
- appropriate safety or support arrangements;
- support with peer relationships or online concerns where appropriate; and
- reasonable adjustments or additional support for pupils with SEND, disabilities, communication needs or other vulnerabilities.

The relevant Class Teacher, Form Tutor and/or pastoral member of staff will periodically check in with the pupil to ensure that the bullying has stopped, that there has been no retaliation or recurrence, and that the pupil feels safe.

Pupil Whose Behaviour Has Caused Harm

The pupil whose behaviour has caused harm will be clearly informed that bullying is unacceptable, must stop and must not be repeated.
The School will support the pupil to reflect on their behaviour, understand its impact and, where appropriate, develop empathy and more appropriate ways of managing relationships and conflict.
Depending on the circumstances, action may include:

- structured reflection and clear behavioural expectations;
- increased supervision or monitoring;
- a behaviour plan or behaviour contract;
- pastoral support and/or referral to the School Psychologist/Counsellor where appropriate;
- restorative work where this is safe and appropriate;
- involvement of parents/carers; and
- proportionate consequences in accordance with the relevant Behaviour Policy, which may include loss of privileges, internal or external suspension or, in the most serious cases,

permanent exclusion.

The School will consider whether the pupil whose behaviour has caused harm may themselves have safeguarding, wellbeing, SEND or other support needs. This does not reduce the seriousness of the behaviour or the need for appropriate boundaries and consequences.
The pupil's behaviour will be monitored following intervention to reduce the risk of recurrence.

Parents/Carers

Parents/carers of the pupils directly involved will normally be informed where appropriate, taking account of safeguarding considerations and the safety and best interests of the pupils involved.
The School will work collaboratively with parents/carers and keep them appropriately informed about support, interventions and relevant developments concerning their own child.
The School will maintain appropriate confidentiality and may not be able to disclose another pupil's personal circumstances, safeguarding information, support arrangements or specific disciplinary consequences.

Restorative Approaches and Reconciliation

Where appropriate, the School may use restorative approaches to help pupils understand the impact of what has happened, repair relationships where possible and support a safe way forward.
An apology, either written or in person, may form part of this process where it is genuine, appropriate and welcomed by the pupil who has experienced bullying.
A pupil who has experienced bullying will not be required to participate in mediation, reconciliation, a restorative meeting or a face-to-face apology.
Pupils are not required to become friends following an incident, but they are expected to behave safely and respectfully towards one another.
Restorative approaches will not replace necessary safeguarding action or appropriate behavioural consequences.

Recording, Monitoring and External Referral

Bullying concerns, decisions and actions will be recorded appropriately in accordance with School procedures.
Where the incident involves or indicates a safeguarding concern, it will be reported to the DSL/ADSL without delay and recorded and managed in accordance with the BIS Safeguarding & Child Protection Policy, including through iSAMS Well-being Manager.
Where required following safeguarding assessment, the DSL/ADSL will make or coordinate referral to appropriate external agencies and/or competent Serbian authorities, in accordance with the BIS Safeguarding & Child Protection Policy and applicable Serbian safeguarding requirements.
The School will monitor cases following intervention to establish whether the behaviour has stopped and whether further support or action is required.
Patterns or recurring concerns identified through bullying records will inform the School's preventative work and wider monitoring of bullying.

Procedure for Responding to all Reported or Suspected Bullying Incidents

1. Concern Reported or Identified
Where bullying or harmful behaviour is reported, witnessed or otherwise identified, the member of staff will respond promptly, establish the basic facts and consider the immediate safety and wellbeing of the pupils involved.
The concern will be passed promptly to the relevant **Class Teacher, Form Tutor, Key Stage Coordinator or appropriate pastoral or senior leader, depending on the age of the pupils, nature of the incident and School's management structure.**
Where the behaviour **raises or may raise a safeguarding concern**, it must be reported to the **DSL/ADSL without delay**. Staff must not conduct their own safeguarding investigation before

referral or wait for behaviour to become repeated or severe.

2. Establishing What Has Happened
Where the matter can appropriately be managed through the School's anti-bullying and behaviour procedures, the relevant member of staff will establish the nature, context and seriousness of the incident.
This may include speaking separately with the pupils involved and relevant witnesses, considering available information and seeking feedback from staff where appropriate.
In determining whether behaviour constitutes bullying, consideration will be given to:

- repetition or pattern of behaviour;
- imbalance of power;
- intention and/or impact;
- distress, fear, humiliation or harm caused;
- SEND, communication needs and other vulnerabilities;
- prejudice or discrimination; and
- the wider context, including online behaviour.

A single incident that does not meet the definition of bullying may nevertheless constitute **harmful behaviour or a safeguarding concern** and must be responded to accordingly.

3. Where Bullying is Not Substantiated
Where bullying is not substantiated but inappropriate or harmful behaviour has occurred, the School will:

- provide appropriate support;
- address the behaviour in accordance with the relevant Behaviour Policy;
- inform parents/carers where appropriate;
- record the concern and action taken;
- monitor the situation where necessary; and
- refer to the DSL/ADSL if a safeguarding concern is identified.

The fact that behaviour is not substantiated as bullying does **not** mean that no action is required.

4. Where Bullying is Substantiated

Where bullying is substantiated, the relevant Key Stage Coordinator, Head of Primary, Head of Secondary or designated senior leader will coordinate the response, with support from the Class Teacher/Form Tutor and other relevant staff.

The School will:

- provide appropriate support to the pupil who has experienced bullying;
- address the behaviour of the pupil who has caused harm;
- inform parents/carers where appropriate;
- apply proportionate consequences in accordance with the relevant Behaviour Policy;
- record the incident and actions taken appropriately;
- provide pastoral, counselling or other support where appropriate; and
- monitor the situation to ensure that the bullying has stopped and there has been no retaliation or recurrence.

The **Head of School/Principal or appropriate member of SLT** will be informed in accordance with School procedures.
Where the incident also constitutes or indicates a safeguarding concern, the **DSL/ADSL will oversee the safeguarding response and make or coordinate referrals to appropriate external agencies or competent Serbian authorities where required**, in accordance with the BIS Safeguarding & Child Protection Policy.

5. Recording and Follow-Up
All reported bullying concerns, decisions and actions will be recorded appropriately. Safeguarding concerns will additionally be recorded and managed in accordance with the **BIS Safeguarding & Child Protection Policy, including through iSAMS Well-being Manager**.
The relevant Class Teacher, Form Tutor, Key Stage Coordinator and/or pastoral member of staff will continue to monitor the situation for an appropriate period and escalate any further concerns as necessary.

Preventing Bullying

Environment

The whole school community will:

- Create and support an inclusive environment which promotes a culture of mutual respect, consideration and care for others, which will be upheld by all.
- Recognise that bullying can be experienced by any pupil and that bullying between children may, depending on its nature and circumstances, also constitute **child-on-child abuse or another safeguarding concern**.
- Openly and appropriately discuss differences between people that may become a focus for bullying, including **disability or SEND, race, ethnicity, nationality, religion or belief, sex, sexual orientation, gender-related prejudice, appearance, family circumstances, communication needs and other actual or perceived differences**.
- Challenge practice and language which does not uphold the values of tolerance, non-discrimination and respect towards others.
- Promote the **safe, positive and responsible use of technology**, including mobile phones, social media, messaging services, gaming platforms and emerging technologies, and address risks associated with harmful or manipulated online content, including **AI-generated content and deepfakes**.
- Work with staff, the wider community and outside agencies to prevent and tackle concerns including all forms of prejudice-driven bullying.
- Ensure that pupils, including those who may be particularly vulnerable or experience barriers to reporting, know **where and how they can seek help and access appropriate support**.
- Celebrate success and achievements to promote and build a positive school ethos.

Policy and support

The whole school community will:

- Provide accessible routes for students, staff and parents/carers to report concerns and obtain support, including clear escalation routes where a concern is not resolved or a child remains unsafe.
- Keep practice under review in response to emerging technology and safeguarding risks, including social media, group messaging, gaming, manipulated media, deepfakes, generative AI and image-based abuse.
- Take appropriate, proportionate and reasonable action in relation to bullying connected to the school even where it occurs off-site or online, while acting within Serbian law and the school's authority.
- Implement appropriate disciplinary sanctions; the consequences of bullying will reflect the seriousness of the incident, so that others see that bullying is unacceptable.
- Use appropriate pastoral, educational and, where suitable, restorative approaches to address bullying and reduce the risk of recurrence. Restorative approaches will only be used where they are safe, appropriate and in the best interests of the pupils involved.

Education and training

The school community will:

- Train all staff, including teaching staff, support staff (e.g. administration staff, lunchtime support staff and site support staff) and pastoral staff, to identify all forms of bullying and take appropriate action, following the School's policy and procedures, including recording and reporting incidents.
- Ensure that all staff know who the DSL and ADSLs are and understand how to report

concerns which involve or may involve safeguarding.

- Address bullying and harmful behaviour through age-appropriate opportunities across PSHE, RSE, Form Time, assemblies, the wider curriculum, pupil leadership and other School activities, including learning about respectful relationships, discrimination and prejudice, online safety, bystander and upstander behaviour, and how to report concerns and seek help.
- Provide systematic opportunities to develop students' social and emotional skills, including building their resilience and self-esteem.

Involvement of students

We will:

- Regularly seek pupils' views on the extent and nature of bullying and their experiences of safety within the School community.
- Ensure that all students know how to express worries and anxieties about bullying.
- Ensure that all students are aware of the range of sanctions which may be applied against those engaging in bullying.
- Involve students in anti-bullying campaigns in School and embed anti-bullying and inclusion messages in the wider School curriculum.
- Publicise the details of internal support, as well as appropriate external helplines and websites.
- Ensure that pupils who experience bullying know how to access support and encourage pupils whose behaviour causes harm to seek appropriate help and support to change their behaviour.

Involvement and liaison with parents and carers

We will:

- Make sure that key information about bullying, including policies and named points of contact, is available to parents/carers online and as a paper copy should they wish to consult this.
- Ensure all parents/carers know who to contact if they are worried about bullying and where to access independent advice.
- Work with parents/carers to address issues beyond the school gates that give rise to or contribute to bullying.
- Encourage parents/carers to work in partnership with the School to model and reinforce respectful and responsible behaviour, both online and offline.
- Ensure all parents/carers know about our Complaints Procedure and how to use it effectively to raise concerns in an appropriate manner.

Monitoring and review: putting policy into practice

- The School will regularly monitor and evaluate the implementation and effectiveness of this Policy to ensure that it is being applied consistently across the School.
- Bullying concerns and incidents will be reviewed, as appropriate, to identify patterns, trends or emerging concerns, including those relating to particular groups of pupils, locations, times, types of behaviour, discriminatory or prejudice-based bullying and online behaviour.
- Information from incident records, safeguarding and pastoral information, pupil voice and other relevant sources may be used to inform this review, while maintaining appropriate confidentiality.
- Where patterns, gaps or areas for improvement are identified, these will inform appropriate School action planning, preventative work, staff training, supervision, curriculum provision and/or pastoral support.
- Significant or recurring bullying concerns and relevant trends will be reported to the Board of Directors as appropriate, while maintaining the confidentiality of individual pupils.
- This Policy will be reviewed at least annually and earlier where necessary, including following significant incidents, changes in applicable Serbian requirements, relevant changes to the British Schools Overseas Standards, or significant changes to relevant safeguarding guidance or School practice.

Policy framework, related BIS policies and support

- British Schools Overseas: Standards for Schools, particularly Standard 16: Preventing Bullying.
- Keeping Children Safe in Education 2026.
- Working Together to Safeguard Children 2026.
- Preventing and Tackling Bullying: Advice for Headteachers, Staff and Governing Bodies (DfE).
- Relationships Education, Relationships and Sex Education (RSE) and Health Education (DfE, 2026).
- Behaviour in Schools: Advice for Headteachers and School Staff (DfE).
- UKCIS: Sharing Nudes and Semi-Nudes – Advice for Education Settings Working with Children and Young People.
- Applicable Serbian safeguarding and education legislation and protocols, as set out in the BIS Safeguarding & Child Protection Policy 2026–2027, including the 2024 Rulebook on the Protocol for Institutional Response to Violence, Abuse and Neglect and the 2022 General Protocol for the Protection of Children from Violence.

Related BIS Policies

- Safeguarding & Child Protection Policy 2026–2027
- E-Safety Policy 2026–2027
- Primary and Secondary Behaviour Policies
- RSE/PSHE Policies
- SEND arrangements
- Complaints Procedure