



**KELLETT SCHOOL HONG KONG**

## **Anti Bullying Policy**

DATE	May 2026
REVIEW DATE	31 August 2028
Owner	ESLT
Working Date:	10/04/26
Legal Sign-off by:	n/a
Legal Sign-off date:	n/a
Type of Policy:	Safeguarding/Pastoral
Authorised by Exec:	14/5/2026
Authorised by Board:	n/a
Circulation:	Parent Portal, staff intranet

## 1. POLICY STATEMENT

1.1 The policy outlines Kellett School's approach to managing bullying behaviours and bullying

1.2 For the purpose of this policy, the term 'child' refers to any student at the school, from ages 4 to 18.

1.3 This policy reflects Kellett School's commitment to student wellbeing and is not an indication of a bullying culture. Kellett School works to foster a culture and learning environment rooted in respect, kindness and integrity. Using recommendations and best practice shared in 'Keeping Children Safe in Education' (KCSIE) and Relationships and Sex Education (RSE, UK) guidance 2026, this policy acts as a proactive and preventive approach to addressing bullying.

## 2. ROLES, RESPONSIBILITIES AND IMPLEMENTATIONS

2.1 A range of staff and/or teams with different responsibilities contribute to the updating, implementation and review of this policy.

- The Safeguarding team lead on content related to safeguarding, reporting thresholds, and statutory compliance
- Senior Leadership Team (SLT) ensure alignment with school ethos, values, and other policies
- Pastoral Leaders / Heads of Year contribute practical procedures and contextual knowledge
- PK/Wellbeing Leads inform the curriculum and student education elements
- Student Voice, particularly in the Senior School, students may contribute to definitions and reporting mechanisms
- Principal and/or the Board of Governors may have oversight or approval responsibility

### 2.1.1 Implementing the Policy

- All staff are responsible for following procedures, logging concerns, and using consistent language
- DSL / Pastoral Team oversee case management, monitoring CPOMS logs, and family communication
- Heads of Year/Phase Leaders lead on day-to-day response and restorative processes
- Class Teachers/Form Tutors/PK teachers deliver curriculum content, monitor student wellbeing and try to provide early interventions to rectify issues. All staff are responsible for logging incidents and maintaining records of actions.
- In the Senior School, a Case Leader leads investigations and family communication for Level 4+ concerns

### 2.1.2 Reviewing the Policy

- DSL ensures continued compliance with DfE, KCSIE, and EDB requirements
- ESLT reviews effectiveness and alignment with school-wide policies
- Pastoral Team provide feedback on practical effectiveness
- Student Voice can contribute to review through focus groups or student council

2.2 The school is committed to safeguarding and promoting the welfare of children and young people and expects all to refer to this policy where appropriate.

### 3. AIMS

3.1 To have a proactive and preventative approach to minimising bullying behaviours and to create a supportive, safe environment for all students.

3.2 To foster an open and transparent culture that enables the early identification of concerning behaviours, minimising the risk of escalation to bullying.

3.3 To ensure that all students, parents, and staff understand the definition of bullying and are clear about how the school will respond, in line with its ethos and values, to maintain a safe and respectful environment free from bullying.

3.4 To underpin a community approach to raising awareness of bullying through student curriculum, parent education, and staff professional development. Students are children and young people who make mistakes; Kellett School is a safe place to learn, reflect, and develop empathy.

3.5 To ensure that all bullying concerns involving students are properly identified, recorded on CPOMS, and addressed transparently and sensitively by the relevant member of the SLT or Pastoral team, in consultation with the safeguarding team, depending on the nature of the concern.

3.6 To ensure Kellett refers to best practice and guidance from the DfE and KCSIE, whilst maintaining accurate definitions of bullying in the Hong Kong context. This policy takes note of EDB recommendations for addressing bullying in the Code of Practice for Private Schools (Jan 2026) and has adapted for the specific context of Kellett School. Where an incident is deemed to be a safeguarding/child protection issue, the Mandatory Reporting criteria will be referred to.

### 4. WHAT IS BULLYING?

#### 4.1 Definition of Bullying

There are four key elements that must all be present for a behaviour to be defined as bullying. In isolation, these would be identified as bullying-type behaviours rather than bullying itself:

- Hurtful — the behaviour causes harm to the target

- Repetitive — it occurs more than once
- Power imbalance — there is an unequal dynamic between those involved
- Intentional — the behaviour is deliberate

Kellett School uses the Anti-Bullying Alliance definition as its foundation:

*"Bullying is the repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power. Bullying can be physical, verbal, or psychological. It can happen face-to-face or online."*

Building on this, Student Leaders in the Senior School worked with the wider Kellett community to develop their own agreed definition:

*"Bullying encompasses a range of repeated, intentional behaviours aimed at causing harm to an individual or group. It typically involves an imbalance of power, with the intention to hurt, intimidate, or undermine the target on an ongoing basis."* November 2024

4.2 Bullying can take many forms. Keeping Children Safe in Education (KCSIE, 2025) states that the following are defined as examples of bullying.

**Physical:** Includes hitting, pushing, kicking, or the theft and deliberate damage of personal property.

**Verbal:** Includes name-calling, persistent teasing, or the use of threatening language or gestures.

**Emotional/Social:** Includes deliberately excluding individuals from social groups, spreading malicious rumours or gossip, or coercing others into harmful behaviour.

**Cyberbullying:** Includes sending harmful or threatening messages, sharing private images without consent (please refer to the Sexual Harassment Policy for further guidance), or creating and distributing hateful content via social media or other online platforms.

**Prejudice-Based Bullying:** Includes bullying motivated by, or targeting, protected characteristics such as gender, race, religion, sexual orientation, disability, or family status.

**Sexualised Bullying:** Includes sexist, homophobic, or biphobic taunts, comments, or behaviours directed at an individual or group.

## **5. A PROACTIVE APPROACH**

### **5.1 Student Education and Awareness**

5.1.1 Through the Positively Kellett curriculum, tutor time (Senior School), and circle time/form time (Prep School), students will receive age-appropriate education on the nature of bullying and how to recognise it. The Safeguarding Team will review PK lesson content regularly to ensure relevance, appropriateness, and alignment with RSE guidance and KCSIE.

5.1.2 Assemblies across both the Prep and Senior School are used proactively, to educate students on expected behaviours and what constitutes bullying, and reactively, to address specific behaviours as and when appropriate. Assemblies may be delivered to specific year groups, targeted cohorts, or to the wider school community, depending on the nature of the concern or topic being addressed.

5.1.3 In consultation with the Safeguarding team and wider Pastoral Team, assembly and tutor time topics will be shaped by trends in concerning behaviours, as identified through KOMODO and CPOMS data, ensuring that education remains responsive to the needs of the school community.

5.1.4 Student focus groups are utilised in the Senior School to provide staff with a deeper understanding of students' lived experiences, both inside and outside of school. The insights gathered will inform and shape the curriculum, assemblies, and tutor time discussions, ensuring they remain relevant and responsive to the needs of the school community.

## **5.2 Reporting and Recording**

5.2.1 In the Senior School, students have access to an anonymous reporting tool monitored by the DSL to raise concerns about bullying. In the Prep School, students are supported to feel confident approaching a named, trusted adult, such as their class teacher, teaching assistant, or school counsellor. This is regularly reinforced through circle time, Positively Kellett, and assemblies.

5.2.2 All staff are required to log any concerns related to bullying behaviours on CPOMS as soon as they become aware of them. This ensures that patterns can be identified over time and that no student becomes a victim of ongoing bullying.

## **5.3 Staff Response**

5.3.1 All staff will ensure they respond to bullying behaviours with kindness, respect, and integrity. Staff will create a non-judgmental, safe space and engage with students from a position of curiosity, responding in a way that avoids shame or blame. Where appropriate, sanctions will be applied and families will be supported in helping their child reflect on and address their behaviour.

5.3.2 All staff contribute to addressing bullying and are supported by guidance on suggested responses, described in section 7. Whilst these are not prescriptive, they provide a framework, ensuring consistency in how concerns are communicated and reducing the potential for misinterpretation.

5.3.3 Staff responsible for teaching bullying awareness within the Positively Kellett curriculum will ensure they are thoroughly prepared to deliver lesson content and are clear on relevant laws and regulations.

5.3.4 Staff addressing bullying through their own curriculum or tutor time will ensure they are prepared and will discuss any concerns about the content ahead of time with the relevant Pastoral Middle Leader, DSL, or AHP/DHHP.

## 5.4 Safeguarding Team Responsibilities

5.4.1 The Safeguarding Team will ensure that all staff receive training as part of their induction outlining what bullying is, how to identify it, and their obligations as educators to address it in order to ensure a safe learning environment.

5.4.2 The Safeguarding Team will monitor KOMODO and CPOMS data to identify patterns and trends in bullying at Kellett, sharing feedback for policies and curriculum content. Assembly topics, tutor time messages, and PK lessons will be updated to reflect any emerging trends in the community.

5.4.3 The Safeguarding Team, supported by relevant SLT and/or Pastoral Team members, will ensure that bullying and related topics — including banter, humiliation, and isolation — are thoroughly covered across both the student and parent curriculum.

5.4.4 The parent curriculum, *Feeling Supported*, will share key research, community trends, and PK lesson content, and will invite speakers where appropriate. It will be delivered across a variety of formats to reach as many families as possible, including webinars, in-person sessions, articles in the K News and MSP, and direct communications via iSAMS.

## 5.4 Staff Training

5.4.1 All staff will receive annual Safeguarding training in accordance with Level 1 KCSIE safeguarding requirements. This refers to the identification of bullying and its possible impact on child safety and wellbeing.

5.4.2 All staff are given the opportunity to complete the 'Girls on Board' and 'Working with Boys' training, enabling them to identify friendship turbulence and support students in proactively resolving concerns before they escalate to bullying.

## 6. REPORTING BULLYING

### 6.1 Staff Reporting

6.1.1 All concerns related to bullying must be reported to the DSL via CPOMS in writing within 24 hours of witnessing an incident or receiving a disclosure from a student.

6.1.2 Written reports must be factual in nature and should not include the personal feelings or conjecture of the reporting member of staff. Staff should be aware that reports may be referred to by external authorities and must therefore be accurate and objective.

6.1.3 Where the threshold for mandatory reporting is met, a report will be submitted by the DSL, who will notify the relevant staff member that they have been included in the report.

### 6.2 Parent Reporting

6.2.1 Parents wishing to raise a concern should contact their child's class teacher or Form Tutor directly, in writing. The member of staff receiving the concern is responsible for

logging it on CPOMS, and appropriate escalation will be determined in line with school procedures.

### 6.3 Student Reporting

6.3.1 Students are encouraged to report concerns through any of the following channels:

- In person, to a trusted member of staff
- Via email
- Via KOMODO
- Via the anonymous Reach Out survey at [reachout@kellettschool.com](mailto:reachout@kellettschool.com) (*Senior School only*)
- By approaching a named, trusted adult such as their class teacher, teaching assistant, or school counsellor (*Prep School*)

## 7. RESPONDING TO BULLYING BEHAVIOURS AND BULLYING

7.1 The steps below outline the school's response to bullying concerns. No sanctions will be issued without assessing which **relevant** steps. Where there is an immediate safety concern, the Head of School or Principal may implement a circuit breaker whilst the matter is investigated. The school reserves the right to adapt the responses below to meet the needs of the individual student or to ensure age-appropriate/incident appropriate actions are taken. Each case is considered individually and the Head of School will guide the final response procedures.

### 7.2 Senior School Response

7.2.1 Response by Level

- Teachable Moment, Level 1–3: The Head of Year will issue a reflection and communicate with the family in line with usual school procedures.
- Level 4 and Above: A case leader will be identified within one working day and will appoint one or two deputies to be present in all student discussions. This protects both students and staff and ensures continuity of resolution.

7.2.2 Investigation (Level 4 and Above)

The case leader and deputy will hear all perspectives individually, without bias, using the Mattering Framework (Appendix A). Where possible, discussions will take place during break or lunch. Students will be encouraged to speak openly with their parents following each discussion. The CPOMS log will be updated in detail throughout. The investigation should be completed within one week of the concern being raised and will proceed regardless of whether a family wishes to engage. The case leader will consult with at least two other leaders (HOY, AHP, DHP, HOS) to determine next steps.

7.2.3 Outcomes and Communication

- Bullying behaviours identified, bullying not established: Parents of all students involved will be contacted verbally, followed by written communication via iSAMS for organisational record-keeping.
- Bullying established: The case leader will invite all families to a meeting, face-to-face or via Teams. The meeting is exploratory in nature. A summary and agreed action points will be shared in writing via iSAMS and recorded on CPOMS.

A key question for all parties: *"Why has this happened, and what was the root cause?"* This supports the identification of alternative pathways and provides clarity for families.

Once all meetings have taken place, the case leader will return to consultation, where possible with the same colleagues, and CPOMS will be updated with agreed next steps. Where bullying is established, a sanction will be issued in consultation with the Head of School and, where required, the Principal. Where required by the EDB, a log will be made.

#### 7.2.4 Restorative Process

Where bullying is established, the case leader will communicate the school's use of the Restorative RED Approach (Appendix B) to all students and families. The timing need not be rushed unless there is a safety or belonging concern. Where a family declines to participate, the student will be asked to write a letter of apology, read in the presence of the case leader and/or HOY and retained by the pastoral leader. Parents will be notified by email of restorative outcomes, recorded on CPOMS by the case leader.

#### 7.2.5 Follow-Up

The case leader will set a CPOMS reminder to follow up with the student who has experienced bullying three weeks after the restorative conversation.

## 7.3 Prep School Response

### 7.3.1 Safety and Immediate Support

Where a bullying concern has been investigated and substantiated, the school will take immediate steps to ensure the safety and wellbeing of the student who has been targeted. This may include increased supervision, adjustments to seating or grouping arrangements, or temporary separation of the students involved during lessons, break times, or other school activities. A named, trusted adult will be identified as a consistent point of contact for the student, whom they can approach if they feel unsafe or need support.

### 7.3.2 Support for the victim

The school will provide age-appropriate emotional and practical support, which may include access to the school counsellor or Wellbeing Team, regular check-ins with a trusted

member of staff, and opportunities for the student to express concerns in a safe and supportive environment.

### 7.3.3 Response by Level and Consequences

The Prep Leadership Team will determine the appropriate level of response. Disciplinary action will be taken in accordance with the school's Behaviour and Discipline Policy, with each case considered individually in light of the age and needs of the students involved.

### 7.3.4 Behaviour Support and Intervention

Interventions will be put in place to address underlying issues and prevent further incidents. These may include restorative practices, targeted sessions on respect and empathy, or specific work with the school counsellor or Wellbeing Team. The school will also consider whether a class or whole-school response is appropriate, such as assemblies, circle time discussions, or community-wide initiatives to reinforce a culture of kindness and respect.

### 7.3.5 Communication with Parents

Parents of all students involved will be kept informed throughout the process. Regular updates will be provided as appropriate, and families will be invited to participate in discussions or meetings. All communications will be recorded on CPOMS and, where appropriate, followed up in writing via iSAMS.

### 7.3.6 Monitoring and Follow-Up

Ongoing monitoring will be conducted to ensure that the bullying does not continue and that all students feel safe. Staff will observe interactions, check in regularly with the students involved, and adjust interventions as needed. A CPOMS reminder will be set to follow up with the student who has experienced bullying three weeks after the restorative process has been completed.

### 7.3.7 Escalation

If bullying continues or the situation does not improve following initial interventions, a formal response will be initiated. Depending on the nature of the case, this may include involvement of the Principal, a formal warning, or temporary exclusion.

### 7.3.8 Documentation

All actions taken, meetings held, and outcomes determined will be recorded on CPOMS. This ensures a clear and accurate record is maintained and provides a basis for any further action if required.

## 8. RECORD KEEPING AND CONFIDENTIALITY

8.1 All bullying concerns will be recorded confidentially on CPOMS to enable the identification of patterns over time. Access to these records will be restricted to DSLs, PLT/SLT and the relevant pastoral lead.

8.1.1 Records will be shared with the EDB where the Mandatory Reporting safeguarding threshold is met.

8.1.2 Where relevant, details of behavioural incidents will be included in transitional documentation when a student moves to a new school.

8.2 The Principal and Safeguarding Governor will periodically review CPOMS records to ensure that all concerns are being managed promptly and appropriately, and that any emerging patterns of concerning or inappropriate behaviour are identified and addressed.

## APPENDIX A

### THE MATTERING AT KELLETT FRAMEWORK

#### RATIONALE

At Kellett, we are committed to ensuring that all students, including both those who have experienced harm and those whose behaviour is being addressed, feel safe, supported, and respected throughout any pastoral process. This applies across all areas of concern, including bullying, sexual harassment, and discrimination.

This framework sets out the principles that underpin how Kellett conducts discussions and enquiries with students. It is designed to instill confidence in our pastoral leaders as professionals, and to reassure students, parents, and staff that all concerns will be handled with care, fairness, and integrity.

We believe that a Kellett education extends beyond academic excellence. We are committed to developing the whole person, nurturing the values of respect, kindness, and integrity in every member of our community. For this to be meaningful, students and families must trust that our procedures are always in the best interests of the individual child and the wider community.

This is particularly important when addressing behavioural concerns, which can feel frightening, threatening, or overwhelming for a child or young person. On occasion, students may exhibit behaviours that are not in line with our expectations. In such circumstances, children and young people can experience feelings of shame, vulnerability, or humiliation. As outlined in *When Girls Fall Out* and *Working with Boys*, these feelings can sometimes lead students to withhold information from their families, which in turn can create tension and distrust between home and school.

It is with this understanding that Kellett's pastoral approach is rooted in curiosity, empathy, and a genuine commitment to helping every student learn, reflect, and grow.

## **AIMS**

1. To ensure that all students, including both those who have experienced harm and those whose behaviour is being addressed, feel safe, supported, and respected throughout any pastoral process.
2. To provide a consistent and transparent approach to pastoral discussions and enquiries, ensuring that students, parents, and staff have confidence in Kellett's processes and pastoral leaders.
3. To create an environment in which students feel safe to communicate honestly, reducing the risk of information being withheld due to fear, shame, or vulnerability.
4. To address the potential for distrust between home and school by ensuring that families are kept informed and that all procedures are clearly understood to be in the best interests of the child and the wider community.
5. To approach all behavioural concerns from a position of curiosity and empathy, avoiding shame or blame, and recognising the emotional complexity that children and young people may experience when their behaviour is being addressed.
6. To distinguish between friendship turbulence and bullying, drawing on the principles of the Girls on Board and Working with Boys approaches, and responding proportionately and appropriately to each.
7. To support every student to learn, reflect, and develop empathy, in line with Kellett's commitment to the holistic development of the whole person.

This framework, in the public domain and widely shared with parents and students is intended to create transparency in process.

## **USING THE FRAMEWORK**

At Kellett, our intention is for every student to feel, and to know, that they matter - that they are a valued member of our community at all times.

This framework is specifically designed to provide rigour, transparency, and robust assurance to students and families when a concern related to bullying, discrimination, sexual harassment, or other serious pastoral matters is raised. It sets out a clear process that Kellett staff will follow, with the best interests of every student at its heart, including all parties involved and the wider school community.

In practice, this framework will be applied during the school day. All discussions will take place in a private setting, away from other students, to avoid unnecessary discomfort or speculation. Where possible, students will be given advance notice of where to go and when, and discussions will be scheduled during lunchtime to minimise disruption to learning. It is acknowledged, however, that on occasion these conversations may need to take place during lesson time.

## THE MATTERING CORE

**“** The Mattering Core

**Recognition:** You and your actions are valued, and your absence would be felt.

**Reliance:** You feel needed because others depend on you.

**Importance:** You feel significant because you're prioritized.

**Ego Extension:** You feel cared for because others are invested in your well-being.

**Attunement:** You feel deeply understood and meaningfully responded to.

— Jennifer Breheny Wallace **”**

When a concern is raised, two members of the Pastoral Team will be identified to work with the students involved. Throughout every stage of the process, staff will ensure that each student feels and knows that they matter: to their teachers and to the school as a whole.

### Recognition

Staff will acknowledge recent successes, drawing on House points, academic achievements, and tutor check-ins, to establish a warm and supportive environment that puts the student at ease from the outset.

### Reliance

Recognising their own capabilities is powerful for young people. Staff will help each student understand that they are a valued member of the community and that the school is relying on them to help maintain a respectful and relational culture.

### Importance

Every student will be treated as a priority. This is demonstrated practically by involving them in next steps, such as how they would like their parents to be informed or which lesson they will miss for a follow-up and by ensuring they receive the undivided attention of both staff members in a non-judgmental, kind, and supportive environment that allows space for reflection.

### Ego

Feeling cared for is paramount. Every student will be offered practical gestures of support: a glass of water, a tissue, a break, the opportunity to call a parent, or access to the school counsellor. This care extends beyond the initial investigation, continuing through follow-up check-ins in the days and weeks after the concern has been resolved.

### Extension

### Attunement

Whilst it may not always be possible to measure whether a student feels deeply understood, our aim is for restorative work, workshops, and reflective activities to give every student a voice and agency, to share how they feel, what they have learned, and, where relevant, to inform improvements to policy and practice for the benefit of themselves and their peers.

## COMMUNICATION WITH PARENTS

Kellett asks that parents and guardians approach this process with trust in the school and its staff. The school's intention is never to misjudge, misguide, or misinterpret a student's behaviour. Rather, it is to acknowledge that a mistake, which may be serious in nature, has been made, and to support the student in adjusting their behaviour going forwards.

This is the nature of schools, and it is something Kellett cares deeply about. Significant investment is made in staff training to ensure that concerns are handled with care, professionalism, and fairness. Kellett's ultimate aim is for every student to develop the confidence, values, and character to be a good person: embodying kindness, respect, and integrity throughout their lives.

Where a concern has been raised relating to behaviours that may constitute sexual harassment, bullying, discrimination, or other serious pastoral matters, the school will communicate with parents and guardians at every stage of the process:

- The relevant member of staff will contact parents by telephone in the first instance, to outline the concern that has been identified.
- This will be followed up in writing, with an invitation to attend a meeting with the school.
- At the meeting, held in person or via Teams, all parties will have the opportunity to discuss the concern openly and constructively.
- Where a sanction is issued, parents will be informed in writing of what was completed as part of the sanction. The student will also communicate directly with their parents, sharing their personal reflection on the matter.
- Where a sanction includes a fixed-term exclusion, a return-to-school meeting will be held prior to the student's reintegration.

## APPENDIX B

### THE RED APPROACH: RESTORE, EVALUATE, DECIDE ON NEXT STEPS

#### Supporting the targeted individual

- Notify all teachers highlighting students of concern and provide guidance regarding seating plans and monitoring
- Offer regular check-ins with the Wellbeing team
- 1:1 restorative conversations can be facilitated by the case leader
- Ensure the student's voice is heard
- Case leader check-in after 1:1s
- Tutor increases sessions (HOY directed), log on ISAMS
- Csse leader follows up with student and family at three weeks. (CPOMS reminder and Outlook calendar note to be used as prompts).

#### Supporting individuals whose behaviours need to be addressed

Restorative conversation, facilitated by case leader, between the students.  
(Letter of apology if restorative process is declined)

Evaluation of individual/group agreement of Kellett Values alignment:

- Each student individually reflects on where the Kellett Values were missed in this specific instance
- Case leader guides students to identify both strengths and shortcomings
- Values reflection captured as an image or written document is shared with the tutor, HOY, Case leader, DHP and HOS
- Student includes a contextual paragraph: how they arrived at their reflection and what they will action going forwards
- If the behaviour is individual in nature: creation of a Positively Kellett resource is the expected learning task.

Decide on a way forward.

Where a group is involved, this will be held as a workshop style activity and will be aligned as either Girls on Board or Working with Boys where the incident is gendered.

Focus on rebuilding relational culture and agreeing shared values going forwards.

### Wider School Response

- All teachers notified via ISAMS with appropriate detail, protecting the privacy of all student involved
- DHP/HOS raises awareness at staff briefing if appropriate
- Safeguarding governor informed if appropriate
- Case leader and consultation group create a tailored assembly to share learning whilst protecting individual privacy
- All actions, meetings and outcomes recorded on CPOMS

## REFERENCES

[HTTPS://ANTI-BULLYINGALLIANCE.ORG.UK/TOOLS-INFORMATION/WHAT-BULLYING/BULLYING-GROUP-BEHAVIOUR](https://anti-bullyingalliance.org.uk/tools-information/what-bullying/bullying-group-behaviour)

[HTTPS://WWW.GOV.UK/GOVERNMENT/PUBLICATIONS/KEEPING-CHILDREN-SAFE-IN-EDUCATION--2](https://www.gov.uk/government/publications/keeping-children-safe-in-education--2)