Anti-Bullying (including Cyber Bullying) Policy

APRIL WELL LIMITED — Company No. 11924473

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This policy is publicly available. It will be shared with staff and homestays and made available to students, parents, agents, partner schools and inspectors on request.

Document Control

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This document is reviewed at least annually in October and whenever statutory guidance, safeguarding requirements or AEGIS Standards change. This revision reflects the AEGIS Guardianship Organisation Quality Standards, September 2026, including Standards 6.9.1 and 6.9.2.

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Policy Statement

The purpose of this policy is:

- to help prevent bullying from happening to students in our care
- to make sure bullying is stopped as soon as possible if it does happen and that those involved receive the support they need
- to provide information to all staff, homestays, volunteers, students and their parents about what we should all do to prevent and deal with bullying.

April Well Limited believes that:

- children and young people should never experience abuse of any kind;
- we have a responsibility to promote the welfare of all children and young people, to keep them safe and to practise in a way that protects them.

April Well Limited is a small guardianship organisation. Students supported by April Well normally live in boarding accommodation at their schools or with their parents. April Well Limited does not provide routine or long-term homestay accommodation. However, April Well may arrange or coordinate short-term emergency accommodation in clearly defined emergency or exceptional situations, in accordance with its Emergency Procedure and safeguarding policies. References in this policy to "homestays" include any host family or emergency accommodation arrangement used or approved by April Well Limited.

We recognise that:

- bullying causes real distress. It can affect a person's health and development and, at the extreme, can cause significant harm;
- all children, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, have the right to equal protection from all types of harm or abuse;
- everyone has a role to play in preventing all forms of bullying (including online) and putting a stop to it.

Contact Details

Nominated anti-bullying lead

Name: Xiaoying Chi (Director and Designated Safeguarding Lead)

Phone/email: +44 (0)7930 416543 / info@aprilwell.co.uk

Designated lead for safeguarding and child protection

Name: Xiaoying Chi (Designated Safeguarding Lead – DSL)

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NSPCC Helpline: 0808 800 5000

Policy

What is bullying?

Bullying may be repeated over time and intentionally hurts a student or group physically or emotionally and is often motivated by prejudice against particular groups, for example, on grounds of race, religion, culture, sex, gender, homophobia, special educational needs and disability, or because a child is adopted or is a carer. It may occur directly or through cyber-technology (social websites, mobile phones, text messages, photographs and email).

Bullying includes a range of abusive behaviour that is:

- repeated;
- intended to hurt someone either physically or emotionally.

The NSPCC explains that bullying can take different forms. It could include:

- physical bullying: hitting, slapping or pushing someone;
- verbal bullying: name calling, gossiping or threatening someone;
- non-verbal abuse: hand signs or text messages;
- emotional abuse: threatening, intimidating or humiliating someone;
- exclusion: ignoring or isolating someone;
- undermining, constant criticism or spreading rumours;
- controlling or manipulating someone;
- making silent, hoax or abusive calls;
- racial, sexual or homophobic bullying (this may involve a criminal offence, including a hate crime);
- bullying someone because they have a disability (this may involve a hate incident or hate crime).

The NSPCC explains that no single sign will indicate for certain that a child is being bullied, but watch out for:

- belongings getting 'lost' or damaged;
- physical injuries, such as unexplained bruises;
- being afraid to go to school, being mysteriously 'ill' each morning, or skipping school;

- not doing as well at school;
- asking for, or stealing, money (to give to whoever is bullying them);
- being nervous, losing confidence, or becoming distressed and withdrawn;
- problems with eating or sleeping;
- bullying others.

Who is at risk?

The NSPCC explains that any child can be bullied for any reason. If a child is seen as different in some way or seen as an easy target they can be more at risk.

This might be because of their:

- race or ethnic background
- gender
- sexual orientation.

Or it could be because they:

- appear anxious or have low self-esteem
- lack assertiveness
- are shy or introverted.

Popular or successful children are also bullied, sometimes because others are jealous of them. Sometimes a child's family circumstance or home life can be a reason for someone bullying them.

Disabled children can experience bullying because they seem an easy target and less able to defend themselves.

Further reading

Further information on bullying (including cyber-bullying) can be found on the NSPCC website https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/bullying-and-cyberbullying/

Prevention

April Well Limited will seek to prevent bullying by:

- developing a code of behaviour that sets out how everyone involved in our organisation is expected to behave, in face-to-face contact and online, and within and outside of our activities;
- holding discussions with staff, homestays, volunteers and students in our care about bullying and how to prevent it. These discussions will focus on:

        - group members' responsibilities to look after one another and uphold the behaviour code;
        - practising skills such as listening to each other;
        - respecting the fact that we are all different;
        - making sure that no one is without friends;
        - dealing with problems in a positive way;
        - checking that our anti-bullying measures are working well.
- providing support and training for all staff, homestays and volunteers on dealing with all forms of bullying, including cyber bullying, racial, sexist, homophobic and sexual bullying; homestays will also be shown available Wi-Fi controls and filtering options;
- making sure our response to incidents of bullying takes into account:
    - the needs of the person being bullied;
    - the needs of the person displaying bullying behaviour;
    - needs of any bystanders;
    - our organisation as a whole.
- reviewing the plan developed to address any incidents of bullying at regular intervals, in order to ensure that the problem has been resolved in the long term;
- Making parents fully aware of our procedures by providing them with a copy of this policy. Students and homestays will receive age-appropriate guidance on bullying, helping friends and reporting concerns through the Student Handbook or this separate policy.

Cyber Bullying

What is Cyber Bullying?

The NSPCC website explains that cyberbullying is bullying that takes place online. Unlike bullying offline, online bullying can follow the child wherever they go, via social networks, gaming and mobile phone and can include:

- sending threatening or abusive text messages
- creating and sharing embarrassing images or videos
- trolling – the sending of menacing or upsetting messages on social networks, chat rooms or online games
- excluding children from online games, activities or friendship groups
- shaming someone online
- setting up hate sites or groups about a particular child
- encouraging young people to self-harm
- voting for or against someone in an abusive poll
- creating fake accounts, hijacking or stealing online identities to embarrass a young person or cause trouble using their name
- sending explicit messages, also known as sexting
- pressuring children into sending sexual images or engaging in sexual conversations.

Cyberbullying is just one type of online abuse. Further details on the different types and signs, as well as how to help keep students safe online can be found in our online safety policy. Our Online Safety Policy requires annual reviews and risk assessments reflecting students' risks, technological developments and current UK safeguarding guidance.

Procedures

We will take seriously and investigate any bullying or cyber-bullying concerns that are reported to us:

- Students will be made aware that they can talk to their parents, teachers, house parents or a member of April Well Limited staff about any bullying concerns they may have. Where a student is staying in accommodation arranged or approved by April Well Limited, the approved adult responsible for the student may also be an appropriate person to contact. If you or a friend are being bullied, tell a trusted adult or contact Xiaoying Chi on +44 (0)7930 416543 (24 hours) or info@aprilwell.co.uk. Do not retaliate or forward harmful content; block and report abusive accounts. You will be listened to and supported. Homestays must listen calmly, reassure the student and report concerns to the DSL immediately; do not promise secrecy.
- April Well Limited staff members may receive a report of suspected online abuse from a student, parent or other source by face-to-face disclosure, email or telephone call. This disclosure will be recorded in writing by the member of staff (using the 'Tell Explain Describe' model if the information is being given by a student);
- Any concerns raised by a student, parent, homestay, member of staff or other source will be reported immediately to *Designated Safeguarding Lead (DSL), Xiaoying Chi.* A written record must follow promptly, within 24 hours, without delaying protective action. If the DSL is unavailable, contact the school DSL or local children's social care; call 999 in immediate danger. Concerns about the DSL must go directly to the school DSL or children's social care;
- If available and not the subject of the concern, the DSL will hold an emergency strategy meeting to discuss the incident, assess the alleged threat and risk to the student (including any relevant facts about the child which may affect their vulnerability including age and ability), implement an action plan and continue to review the situation until a resolution has been achieved. Written notes will be kept securely of this meeting by the DSL;
- The DSL will arrange for the young person to be helped and supported in recognition of the pressures (and possible vulnerabilities) they may have been under as a result of the suspected abuse;
- Any concerns that bullying (including cyber-bullying) has taken place at a student's school will be referred to the DSL of the school concerned;
- If the alleged bullying incident involves a member of a homestay family, emergency accommodation household, or another student staying in accommodation arranged or approved by April Well Limited, the organisation will follow its Safeguarding and Child Protection Policy and statutory agency advice and, if necessary, will ensure that the student is moved to alternative safe accommodation.

- In most cases parents will be kept informed about the situation and the actions that the GO is taking unless there is good reason to believe that involving these parties would put the young person at risk of harm;
- We will support the victim and the perpetrator (if they are a student in our care) and monitor students well-being following a bullying incident for as long as necessary;
- Where there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm' due to bullying, we will refer the matter immediately to local children's social care and, where appropriate, the police;
- Please note that strong sanctions such as termination of our contract may be necessary in cases of severe and persistent bullying;
- Full records of bullying concerns, actions and correspondence with statutory agencies will be kept securely and confidentially by the DSL, Xiaoying Chi. Access is on a need-to-know basis; concerns about the DSL follow the external reporting route above.

- Whilst it is acknowledged that bullying may be repeated over time, we will take action in response to a single incident and make an appropriate record.

Specific cyber-bullying procedures in addition to the above

- In the case of cyber-bullying, support for the student could include helping them to understand how to recognise the early signs of online abuse, the wider issues and motivations of online abuse and making available relevant information and material. This help and support could be provided by accredited organisations such as the school, National Society for the Prevention of Cruelty to Children (NSPCC), Childline, National Crime Agency (NCA), Child Exploitation and Online Protection Centre (CEOP) websites and helplines;
- The DSL will ensure that viewing of any images or other content is only made where there are good and clear reasons to do so (unless unavoidable because the student has willingly shown a member of staff), basing incident decisions on what the DSL has been told about the content of any imagery or other content. Staff must refer any proposed device search or deletion of imagery to the DSL, who will liaise with the school DSL or police as appropriate;
- The DSL will consider whether it is necessary and appropriate to ask the student to preserve relevant evidence, for example non-sexual messages or screenshots (never copies or screenshots of nudes or semi-nudes of under-18s), and may advise that the device or content should be made available to the school, police or statutory agency where appropriate. Any viewing of images or content by April Well staff will only take place where there is a clear safeguarding reason and will be recorded, including those present, date, time and reason;
- The incident will be referred to a statutory agency (Children's Services on the Local Authority telephone number or the police by dialling 101) immediately if there is a concern a young person has been harmed or is at immediate risk of harm (telephone the police by dialling 999). This would include information coming to light if at the initial stage:
    - The incident involves an adult;
    - There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs);

- What you know about any imagery or other content suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent;
- Any imagery or other content involves sexual acts and any pupil in the imagery is under 13;
- You have reason to believe a student is at immediate risk of harm owing to the sharing of any imagery, for example, the young person is presenting as suicidal or self-harming;
- The DSL will assess suspected illegal content under safeguarding guidance and refer to police where required; online sexual abuse or grooming may also be reported to NCA-CEOP;
- If none of the above apply, the DSL may decide (with input from key stakeholders if appropriate) to respond to the incident without involving the police or children's social care. The DSL can choose to escalate the incident at any time if further information/concerns come to light. The decision should be recorded in line with the Safeguarding and Child Protection Policy, and regularly reviewed throughout the process of responding to the incident;
- The decision to respond to the incident without involving the police or children's social care would be made in cases when the DSL is confident that they have enough information to assess the risks to pupils involved, and the risks can be managed within the April Well Limited support framework and network for the child.

- Where statutory agencies or the school DSL do not need to take possession of the device or content, and where deleting the content would not interfere with any investigation, the DSL may advise the young person to delete the imagery or content to prevent further sharing. A record will be made of the decision, including the reason, date, time and actions taken.

- April Well staff will not search a student's device unless there is a clear safeguarding reason, valid informed agreement and it is appropriate in the circumstances. Schools' statutory search powers do not apply; staff must not compel access. Where possible, the student will be asked to preserve relevant evidence, and the matter may be referred to the school DSL, police or statutory agency as appropriate. Any decision and action taken will be recorded, including the date, time, reason and persons present. Parents and carers will be informed unless this would place the student or another child at further risk.
- Where the DSL is aware that youth produced sexual imagery or other content has been unavoidably viewed by a member of staff, the DSL should ensure that the staff member has appropriate support. Viewing youth produced sexual imagery or other content can be distressing for both young people and adults and appropriate emotional support may be required;
- Staff or volunteer allegations must follow safeguarding procedures, with prompt Local Authority Designated Officer (LADO) and police liaison as appropriate. Protect children immediately and coordinate internal enquiries with agencies. Self-report significant safeguarding concerns, compromising or potentially misconstrued situations and behaviour below expected standards to AEGIS.

Responding to an incident of the sharing of nudes and semi-nude imagery

- Any necessary DSL viewing must follow the guidance *Sharing nudes and semi-nudes: advice for education settings working with children and young people*. Viewing is exceptional, by the DSL with another staff member present, with a same-sex viewer wherever possible. Staff and homestays must never copy, print, store, share or request imagery.

Related policies and procedures

This policy statement should be read alongside our organisational policies and procedures including:

- Safeguarding and Child Protection Policy
- Staff, Homestay and Volunteer Code of Conduct
- Student Behaviour Code of Conduct
- Online Safety Policy

Review

We are committed to reviewing our policy and good practice annually.

This policy was last reviewed on: 21/10/2026

Signed: 

Name: Xiaoying Chi

Role: Director and Designated Safeguarding Lead (DSL)

Date: 21/10/2026