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Llywodraeth Cymru
Welsh Government

Welsh Government Consultation on the draft anti-bullying guidance and supporting toolkit

Feedback from regional workshops January – February 2019

Final report

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In October 2011, the Welsh Government published 'Respecting others', a suite of comprehensive anti-bullying guidance covering five key areas setting out the importance of adopting a preventative approach whilst recognising that responsive measures are also required. Local authorities and schools have used this guidance to help develop their own anti-bullying policies and strategies, ensuring greater consistency of practice across Wales. Since 2011, when 'Respecting others' was published, there have been a number of significant developments, which are relevant to the anti-bullying guidance.

In 2016, the Minister for Education approved a programme of work for anti-bullying which included revising 'Respecting others' to update and strengthen the guidance and ensure it reflects the current policy and legislative landscape and changes in technology. Between 2016 and 2018, the Welsh Government carried out extensive engagement with partners and stakeholders, including schools, local authorities, education practitioners, Estyn and children and young people to determine what changes should be made to the guidance to ensure it remains effective and user friendly.

The Welsh Government worked with an external contractor to produce new draft anti-bullying guidance and an operational toolkit to help tackle bullying in schools and school communities. During the 14 week public consultation period, the Welsh Government held a series of engagement events with partners and stakeholders. This included four regional engagement events to seek views directly on the draft guidance and supporting toolkit by means of discussion workshops with education practitioners and stakeholder organisations.

2.   Fieldwork Methodology

The fieldwork approach was agreed with the Welsh Government policy team and engagement opportunities were planned to achieve a balanced geographical range. An email invitation was issued by the Welsh Government to a wide range of stakeholder organisations with an interest in the draft guidance. Fieldwork took place between 23 January and 8 February 2019. Four regional consultation workshops were held at:

- University of Wales Trinity Saint David's, Carmarthen, 23 January
- Chepstow Racecourse, 25 January
- The Vale Resort, Hensol, 6 February
- Venue Cymru, Llandudno, 8 February

Each event was held over two hours and 45 minutes and consisted of:

- Scene setting on work undertaken to develop the guidance and toolkit to date;
- A video address from the Minister for Education;
- Discussion Workshop 1 to explore stakeholders' views on illustrative sections of the draft schools guidance; and

- Discussion Workshop 2 to explore stakeholders' views on the supporting online toolkit and to review selected hardcopy resources from two sections of the toolkit.

Following discussion, each group's key points were summarised on a standard feedback template. They then provided an overview of their discussions to the whole audience during a plenary session.

In total 125 individuals participated in the discussion workshops. The events were attended by representatives from schools, pupil referral units, local authorities, regional education consortia, Estyn, teaching unions, the Welsh Network of Healthy Schools, local health boards, the Royal College of Nursing, the All Wales School Liaison Core Programme, Dyfed-Powys Police, North Wales Police, campaigning groups and voluntary sector organisations with an interest in anti-bullying.

In addition to attending these events, stakeholders were also encouraged to raise awareness of the draft anti-bullying guidance with their colleagues and wider audiences, and to respond to the online Welsh Government consultation.

While qualitative research was the most appropriate methodology for this consultation, it is important to bear in mind that it utilises small samples that represent a range of views. Qualitative research is designed to be illustrative and this needs to be taken into account when interpreting the findings. The quantitative findings in this report are based solely on collated responses given by participants at the targeted consultation activities. The findings, therefore, are not representative of the wider population.

3. *Key Findings*

This report summarises responses to key consultation questions received at the four public engagement activities.

3.1 Reviewing illustrative sections of the draft anti-bullying guidance

For Discussion Workshop 1, participants self-selected a group of up to seven people. Each group was provided with copies of the draft anti-bullying guidance *'Respecting others – schools'* and consultation questions to consider. Each group was asked to identify a chair, spokesperson and scribe. They were then asked to review five illustrative sections of the draft guidance and respond to the consultation questions. The five sections, which in total represented approximately 25% of the whole document, were:

- What is bullying?
- What is not bullying?
- Governance
- Prevention
- Responding when bullying occurs

For each of the five sections, groups were asked to discuss and rate the following aspects:

- How helpful do you find this section?
- How user–friendly is this section?

Also for each section, groups were asked to discuss:

- Which aspects do you particularly like? Why?
- Which areas could be improved? Why?

3.1.a What is bullying?

When asked their views on this section of the guidance, the overwhelming majority of participants agreed that the content was helpful (82.4%) and the layout user-friendly (72%) – see Table 1 for details. Design features they particularly liked included:

- that the definition was shaded in green to give it greater prominence
- the use of bullet points, specifically in this section, and elsewhere throughout the document, to improve readability
- the signposting to resources in the online toolkit

Table 1						
Group vote (n = 125)	not answered	1 'not at all'	2	3	4	5 'very'
How helpful do you find this section?	7 (5.6%)	0 (0%)	6 (4.8%)	9 (7.2%)	77 (61.6%)	26 (20.8%)
How user-friendly do you find this section?	7 (5.6%)	0 (0%)	1 (0.8%)	12 (9.6%)	45 (36%)	45 (36%)

A particular aspect which most participants identified as a strength was the concise and succinct definition that they felt provided a clear context for the rest of the document. They appreciated that the definition applied across all settings and age ranges and would be relatively easily understood by children and young people. They also liked the supporting text, in particular sections 2.3, 2.4. 2.7 and 2.8, which they felt was well expressed and helped understanding by breaking down the distinctive elements of bullying. The clarification given regarding the response to one-off incidents was also perceived as helpful with a minority suggesting that the italicised text on page 7 should be included in the main text.

'The definition is easy to understand and will be useful for training staff and with parents.'

'A clear and helpful definition. Nice and simple and not open to interpretation.'

Participants generally welcomed the idea of schools involving learners, using the definition provided in the draft guidance, to agree their own definition of bullying. They felt that this approach should be extended to include all members of the school community, so the definition is shared and understood. Examples of positive feedback included:

'It's important to involve learners in the development of their school's definition of bullying and the policy to show how their school challenges bullying.'

'We like the emphasis on the involvement of children and young people. Getting their perspective is vital.'

When asked to identify which areas could be improved, a minority of participants felt that the definition is open to interpretation at school level which may mean that vulnerable children are treated inconsistently when moving schools. They argued that a consistent nationally agreed definition is needed across all schools.

'Does consulting with learners undermine the definition in the guidance? Why not agree and fix the definition in the guidance and use this with all children and young people to ensure a consistent understanding.'

'Is it actually possible to define bullying? Will this narrow definition stop some incidents being reported?'

'Any disclosure of bullying must be taken on its own merits – don't take the definition (in the guidance) as prescriptive.'

The Welsh medium group at the Llandudno event suggested that the Welsh translation of the definition does not read naturally. They argued that in Welsh the definition is too long and needs sub-dividing. Participants also suggested that the definition needs to include a reference to social isolation to capture young people's anxiety experienced by 'fear of missing out' (FOMO) i.e. that an exciting or interesting event may currently be happening elsewhere, often aroused by posts seen on social media.

'Like that there is a definition given but feel that this needs to include social isolation along with physical and emotional.'

Participants identified a need to clarify some of the terminology used, in particular the interchangeable use of cyberbullying and online bullying. Broadly they preferred the term online bullying, as explained in the *'Terms used in this document'* section. Alternatively, they suggested including a footnote in this section to explain the difference between cyberbullying and online bullying. They also suggested that stronger references to the impact of social media should be included as a distinctive element of bullying behaviour.

'Cyberbullying is an old term and is not needed. Online bullying is the umbrella term to cover all social media and online platforms.'

'Could look at categorising bullying as 'direct' (face-to-face) and 'indirect' (in the digital environment).'

Participants raised concerns about the relatively passive tone used in the guidance, in particular the use of 'should' and' may'. They argued that the guidance should provide schools with stronger direction and that statutory requirements should be clearly stated. The use of 'must' was advocated in such cases to avoid ambiguity.

'Is it mandatory to report bullying? If not, how does a school recognise patterns of behaviour?'

'The sections which are statutory must be made explicit.'

Most participants felt the use of the terms 'perpetrator' and 'target' were appropriate in a bullying context. However, they wanted greater consistency in the use of key phrases to remove any ambiguity, for example the lack of consistency in the use of children and young people throughout the document. Another specific example given for this particular section was the potential confusion caused by the interchangeable use of the phrases *'repeated', 'repeated over time'* and *'bullying usually involves repeated acts'*. They also sought clarification of the terms *'over time'* and *'one-off'*.

'While it is recognised in the guidance that one-off incidents can have a traumatic effect, we feel this aspect should be given more prominence.'

Similarly they suggested that 2.4 should be reworded to state '*There is a **perceived** imbalance of power …*' to be more consistent with the language used in the 'unequal power' text on page 9   *'**Unequal power:** bullying involves the abuse of power by one person or a group who are (**perceived as**) more powerful….'*

'Unsure about the use of 'repeated over time'. Does this imply that teachers have to wait for a certain number of incidents before intervening and providing support?

'How frequently is 'repeated over time?'

'Long, wordy and formal; need to be more concise and simplify text where appropriate.'

Another suggestion was that the prejudice-related text (2.8) relating to stereotypes or presumptions about identity needs developing further. In addition to the characteristics listed, it was suggested that it could also include young people's cultural interests e.g. music, family status e.g. looked after/in care, and their social context e.g. living in poverty.

Suggestions for additional improvements included adding:

- a reference to grooming/mate crime; both in this section and in the glossary/'Terms used' section
- a statement added to 2.8 (*'Bullying can take many forms'*) to explain that 'The list of examples given is not exhaustive'
- quotes from learners to highlight the impact of bullying
- anonymised case studies to exemplify all types of bullying available via the online toolkit

3.1.b   What is not bullying?

When asked their views on this section the majority of participants agreed that the content was helpful (65.6%) and user-friendly (73.6%) – see Table 2 for details.

Table 2						
Group vote (n = 125)	not answered	1 'not at all'	2	3	4	5 'very'
How helpful do you find this section?	7 (5.6%)	17 (13.6%)	0 (0%)	19 (15.2%)	49 (39.2%)	33 (26.4%)
How user-friendly do you find this section?	14 (11.2%)	6 (4.8%)	0 (0%)	13 (10.4%)	44 (35.2%)	48 (38.4%)

Most participants liked the layout of this section and found the content to be clear and easy to read with few ambiguities. They welcomed the explanations of examples which would not normally be considered bullying and felt that such a list would be a very useful resource for professionals to use to promote discussion with young people, colleagues and parents/carers. Participants also welcomed the emphasis on the need for one-off incidents to be recorded. Examples of positive feedback included:

'No overlap with previous section so easy to understand.'

It's useful to have a list of examples that do not constitute bullying.'

'The reference to safeguarding and the involvement of the police helps raise awareness that bullying can also be a safeguarding issue.'

'If one-off incidents are recorded properly it should help to see how such incidents escalate into bullying.'

'Could be used to create a tool to help decide if an incident is bullying or not.'

When asked to identify which areas could be improved, a small minority of participants argued that this section overlaps with the previous section 'What is bullying?' and is potentially confusing.

'We don't feel this section should be uncoupled from the previous section. It's very risky to include as a separate section. What if a teacher takes this as a reason not to act? Does it legitimise the listed behaviours?'

Whilst some participants liked the reference to 'insults and banter', others argued that the inclusion of the terms in this section possibly gives some professionals an 'escape' not to report cases of bullying. They suggested additional content be included in the online toolkit to encourage schools to challenge unwanted banter before it becomes bullying.

'Don't like the use of 'banter' as can be used to justify bullying.'

'The 'Insults and banter' text is clumsy and needs redrafting.'

'Banter is often used as a get-out clause. If banter is repeated then it should be bullying. The impact of banter depends how resilient the target is.'

Workshop discussions indicated that some participants struggled to distinguish between prejudice-related bullying and hate crime. They sought further clarification regarding the reporting requirements for such incidents, and specifically when to involve the police. Similarly some felt any requirements on schools in relation to anti-bullying, as set out in the *Tackling Hate Crimes and Incidents; A Framework for Action* (Welsh Government, 2014) and in the revised *Prevent Duty guidance: for England and Wales,* need to be highlighted and explained clearly.

'Hate crimes do not always fall under the Prevent policy.'

'Do all schools have a Prevent policy? Should this be safeguarding?'

'Hate crime responses or events leading to a hate crime should be looked into. Schools say it is a police issue, the police say it's a school issue and consequently a child may be left with no support.'

Suggestions for additional improvements included:
- clarification about the recording and reporting of one-off incidents
- advice on specific examples such as the retweeting of photos and film clips of bullying incidents, and how schools should record and report such incidents
- adding an explanation of 'therapeutic intervention' in the 'Terms used in this document' section

'Our concern is that one-off incidents could be taken as not bullying and so no further action would be taken or the underlying reasons for the incident not explored.'

'Who makes a judgement over therapeutic intervention? There is a shortage/lack of actual therapy available. Is there funding for this support? How qualified are schools to make this judgement?'

3.1.c Governance

Participants expressed mixed views on this section. Approximately half (51.2%) felt that it was user-friendly. However, many were ambivalent about the helpfulness of the content – see Table 3 for details.

Table 3						
Group vote (n = 125)	not answered	1 'not at all'	2	3	4	5 'very'
How helpful do you find this section?	1 (0.8%)	0 (0%)	24 (19.2%)	77 (61.6%)	13 (10.4%)	10 (8%)
How user-friendly do you find this section?	7 (5.6%)	0 (0%)	12 (9.6%)	42 (33.6)	36 (28.8%)	28 (22.4%)

Particular strengths identified were:
- the acknowledgment that the anti-bullying policy should align with other school policies; however, feelings were expressed that the anti-bullying and school behaviour policies need to be separate documents
- the list of elements that a school anti-bullying policy should contain
- the emphasis on anti-bullying work being '*embedded in the curriculum….'*
- the clear direction given to senior leaders that regular anti-bullying training should be provided for all staff to ensure everyone has a shared understanding so that incidents are recorded and reported consistently. Concerns were expressed however that, due to budget constraints, anti-bullying training can be challenging to deliver in practice.
- the inclusion of a section addressing how bullying incidents on journeys to and from school will be prevented
- the links to supporting resources in the online toolkit

Participants felt that the wording of section 10.3 *'The policy should be regularly updated.'* should be more prescriptive to state that *'the policy should (or even must) be reviewed and updated annually'* to ensure a consistent approach across all schools. Others also suggested that the wording of section 10.4 was too passive, specifically that '*schools may choose to publish the policy on their websites.'* They argued that it should be mandatory that all schools publish their anti-bullying policy on the school website. Alternatively, if this is not a statutory requirement, the phrase *'It is best practice for schools to publish the policy on their websites'* could be adopted.

'Should be a separate anti-bullying policy to give it more status and be referenced in behaviour policy.'

> *'Remove the term 'should' as it gives schools flexibility to miss certain aspects from their policy.'*

Suggestions for additional improvements to this section included:

- strengthening anti-bullying related references to the requirements of the new curriculum, in particular to the health and well-being Area of Learning and Experience
- explaining how anti-bullying classroom activities should focus on promoting healthy personal relationships
- integrating a reference to children's rights
- adding that the anti-bullying policy should link to other relevant policies, in particular explaining how the anti-bullying policy relates to the Travel Behaviour Code
- specifying lead responsibility for anti-bullying policy development and implementation
- providing greater detail about the role of governors in the regular review of the anti-bullying policy; consider adding a requirement for all schools to have a lead governor with responsibility for anti-bullying, well-being and safeguarding.
- including any acronyms, such as PSED, alongside their explanation in the 'Terms used' section
- exemplifying the *'Signs a child might be experiencing bullying'* with specific examples, possibly as an appendix
- providing an exemplar policy template for schools to download from the online toolkit
- explaining how learners, including those with English as an additional language (EAL) and with special educational needs (SEN), may be consulted and involved in policy development
- specifying members of the school community and providing examples of consultation tools via the online toolkit
- clarifying how often regular anti-bullying related professional development opportunities for staff should be provided
- making staff training resources available via the online toolkit
- clarifying responsibilities for monitoring bullying incidents on journeys to/from school, not just on school transport, but also involving those pupils who do not use school transport
- explaining the requirements for reporting the incidence of types of bullying to the governing body and local authority
- explaining to parents and carers how and where to report bullying incidents
- adding possible consequences and sanctions
- adding a requirement for schools to provide a child friendly version of the anti-bullying policy
- develop a case study to show how a school could use the public sector equality duty (PSED) as a lever to reduce bullying

'The anti-bullying policy should be integral to the whole school approach to well-being and not just linked to other policies.'

'The anti-bullying policy should have links to the safeguarding, behaviour and travel behaviour policies.'

'Feel we need a standard anti-bullying policy from Welsh Government for all schools.'

'Will there be a Welsh Government anti-bullying policy template? This would be useful.'

'The PSED is not fully explained; Estyn thematic reviews show a lack of understanding of the PSED among school staff.'

'There is a key section missing regarding who is the lead worker in school with overall responsibility for anti-bullying.'

'Who is going to write the policy and review it? Whose responsibility is it to ensure it happens?'

'The nominated governor with responsibility for anti-bullying should be named in the policy.'

'Scrutiny from the governing body is vital; having a policy makes little difference, it has to be enforced and scrutinised.'

'Countries which have researched this have found that having a policy makes no difference to bullying levels. More governing body scrutiny is needed with a clear link to safeguarding.'

'Training for governors in anti-bullying policy and procedures should be mandatory.'

'Bullying data should be shared with the school council and local authority to identify patterns.'

'Estyn should monitor the implementation of the anti-bullying policy in a supportive way.'

'External agencies should be aware of and adhere to the school's anti-bullying policy.'

'The policy should stress the importance of staff being neutral and not sharing their personal perspectives, views and feelings.'

3.1.d   Prevention

Once again participants expressed mixed views. Approximately one third (34.4%) found this section to be helpful and user-friendly (33.6%), in particular the emphasis on positive language – see table 4.

Table 4						
Group vote (n = 125)	not answered	1 'not at all'	2	3	4	5 'very'
How helpful do you find this section?	0 (0%)	7 (5.6%)	38 (30.4%)	37 (29.6%)	32 (25.6%)	11 (8.8%)
How user-friendly do you find this section?	6 (4.8%)	10 (8%)	33 (26.4%)	34 (27.2%)	25 (20%)	17 (13.6%)

The two elements that they described as being most helpful were the emphasis on a whole school approach (11.2) and embedding anti-bullying approaches into the curriculum (11.6 and 11.7). They also welcomed the focus on positive behaviour, kindness, building resilience, and references to restorative practice.

'Like that it acknowledges that supportive school cultures are better than one off events.'

'We feel that curricular approaches are key with other interventions used to enrich.'

Conversely, approximately one third of participants (36%) found this section to be unhelpful and not user-friendly (34.4%). Criticisms included the text being too verbose and repetitive. Others felt that 'prevention' is the most important section and argued that it should be positioned earlier in the document. In addition to resources that provided further information via the online toolkit, participants also wanted access to bilingual teaching resources and examples of effective preventative practice.

'This is the most important section of the guidance. It should be enhanced and more detailed!'

'The sentences are too long; need to be shorter and clearer e.g. in section 11.2, the word approach is used several times.'

'Lots of useful content, but the section as a whole is too wordy.'

'The 'Effective communication' section is useful but needs editing.'

'It includes out-dated examples e.g. a reference to a 2002 book.'

'It would be useful to separate prevention and intervention to create a culture of celebration and respect. Don't think this section does this justice in terms of a whole school approach to anti-bullying.'

'Could we have Welsh languages resources as well?'

'Need access to Welsh language versions of resources such as those from the Anti-Bullying Alliance.'

'We need more links to useful resources and successful approaches e.g. Estyn examples of good practice.'

Suggestions for improvements included:

- explain how anti-bullying related work complements the requirements of the curriculum; in particular to one of the four purposes, namely to support our children and young people to be healthy, confident individuals, ready to lead fulfilling lives as valued members of society, and also the Health and well-being Area of Learning and Experience
- give examples of best practice of successfully embedding curricular approaches including how anti-bullying work is brought into all curriculum areas where appropriate and how mutual respect is promoted across the curriculum
- make bilingual teaching resources on preventing bullying available via the online toolkit to assist with lesson planning
- provide examples of effective whole school prevention strategies such as buddying, mentoring, anti-bullying/wellbeing committee, restorative practice, playground peacemakers, circle time, personal and social education (PSE) lessons on personal relationships and community cohesion mornings
- offer suggestions for pupil participation e.g. peer-led programmes and mentoring
- provide case studies to show how schools collect bullying-related data to inform and adapt their prevention strategies
- provide a directory of evidence-based programmes and links to external agencies for help and advice
- explain the preventative roles of peers, bystanders and parents more fully

'This section needs to link with the curriculum reforms.'

'Prevention is focused on behaviours and school culture influences behaviour. Normalise diversity with positive images in school and through the language used by staff and pupils. The guidance is reactive and needs more on developing prevention and a mutually respectful school culture.'

'Changing the school ethos/culture is difficult to achieve. The guidance should stress the need to collect data to inform and tailor intervention/prevention.'

'Not enough emphasis on how important it is that staff show respect, both staff to pupils, and staff to staff.'

'Asking schools to have an anti-bullying/prevention action plan would make monitoring easier/more targeted.'

3.1.e   Section; Responding when bullying occurs

Approximately one third of participants (33.6%) found this section to be helpful and user-friendly (32%) – see table 5. In particular, they welcomed the inclusive whole school approach, the commitment to staff training, the need for an appropriate response and the encouragement to use each specific bullying incident as a learning opportunity. Some felt that there was an opportunity to strengthen references to the PSED, and in particular, the need for schools in Wales to eliminate discrimination and to foster good relations across all protected characteristics.

Table 5						
Group vote (n = 125)	not answered	1 'not at all'	2	3	4	5 'very'
How helpful do you find this section?	13 (10.4%)	1 (0.8%)	33 (26.4%)	36 (28.8%)	42 (33.6%)	0 (0%)
How user-friendly do you find this section?	27 (21.6%)	0 (0%)	21 (16.8%)	37 (29.6%)	27 (21.6%)	13 (10.4%)

They appreciated the links to exemplar bullying incident recording forms, and whilst they liked the range of practical examples given (12.5), some felt that the phrase *'some bigger problem…'* could be replaced with adverse childhood experiences *(ACEs).*

They also found the 'Routes to Report' examples very helpful and suggested adding:
- Education Welfare Officers
- youth workers as alternative, independent adults
- using an electronic device, app, or an online system e.g. email as a (digital) method of reporting a concern

- *'Schools should have a section in their policy that explains how children and/or parents can report bullying incidents online.'*

- *'How can all learners report their concerns especially EAL learners and those with additional learning needs?'*

They also identified the financial challenges faced by schools when supporting the targets of bullying.

'There are financial issues around the practical implications of schools offering a range of ways for learners to report bullying, for example, lack of access to support, no school nurse, a Head of Year covering three year groups. Deficit budgets restrict interventions.'

'Schools do not always have enough resources to provide support to individual pupils e.g. therapy, Family Services.'

Participants also welcomed the advice provided on recording and saving evidence of bullying incidents (12.9) and stressed the need for staff training to ensure a consistent approach is adopted. One group specifically advocated for 'My Concern' safeguarding software to be made available to all schools in Wales.

'We like that it emphasises that the school response should not lack sincerity.'

'Need to include how schools respond to one-off events and ideas to do this effectively.'

The participants (27.2%) that did not find this section helpful felt that the introductory text (12.1) should be more inclusive and assertive. They suggested that all school staff should know what procedures to follow. They also felt that staff need more guidance and training on recording bullying incidents and saving evidence; in particular staff may need reassurance given the requirements of the General Data Protection Regulation (GDPR) and the potential legal implications of viewing images of a sexual nature and storing such evidence digitally.

'Aware is not enough. Robust training needs to be implemented for all staff.'

'Looking at and saving electronic/digital evidence/images may leave staff vulnerable to legal action.'

'Is a photocopier really the best way to capture evidence? Can it be submitted as evidence if a criminal conviction is pursued?'

They also proposed including more detail about supporting the target of bullying after the initial disclosure. They suggested including a flow chart to outline a tiered approach; universal support, targeted support, the involvement of specialist services. Similarly, some

sought a greater emphasis on involving parents/carers and friends. One group also recommended including a 'Routes to resolution' sub-section with suggestions of possible approaches such as mediation and restorative practice.

Another suggestion was to clarify the role of bystanders, the impact of witnessing bullying incidents on them and recognising their support needs. Finally, some felt that the 'Next Steps' text (12.10) should be developed to stress the need, regardless of the individual nature of each case, to inform the target of bullying about the actions taken.

'What is an appropriate approach/response? Can we have examples of successful strategies?'

'If bullying is happening outside school, parents need to know who to report it to as the school may say it is not their responsibility. The guidance is not clear.'

'Consider having a traffic light scale to record the level of seriousness of bullying incidents e.g. a push is less serious that a punch; a year 11 pupil bullying a year 7 pupil is more serious than a year 7 pupil bullying another year 7 pupil.'

Other general feedback received on the draft guidance:

Some participants felt that the title of the draft guidance needs to be more inclusive e.g. 'Schools and other education settings', to include settings such as Pupil Referral Units and Education Other Than at School (EOTAS) provision. Participants also stressed that the importance of asking learners for their opinions and views should be emphasised throughout the guidance.

One group questioned the use of the term 'disability and disabled person' (as defined in the 'Terms used' section). They argued that disability and disabled person are not the same from a social model of disability perspective. As the Welsh Government has adopted the social model of disability, the language/terminology used in the guidance needs to reflect this (see Welsh Government Action on Disability Framework).

3.2 Exploring the supporting online toolkit and reviewing resources

For Workshop 2, participants were allocated a discussion group of up to six people. Each group was given a brief introduction to the online toolkit, its navigation, format and content, and provided with hard copies of selected resources from one section of the toolkit to look at in detail. The sections chosen were:

- Specific types of bullying and prejudice-related bullying
- Responding when bullying occurs

Each group was asked to identify a chair, spokesperson and scribe. They were then asked to review the selected resources and respond to the consultation questions. Following discussion, each group's key points were summarised and they provided an overview of their discussions to the whole audience during a plenary session.

3.2.a The supporting online toolkit

The majority of participants (52.2%) felt that the toolkit would be helpful in supporting the implementation of the guidance – see table 6. They liked the principle of having a central repository for relevant documents and resources and felt that the toolkit was easy to navigate. They identified a need however to clarify whether the toolkit resources are being recommended/endorsed by the Welsh Government or are they simply being offered as optional resources. If the latter, then they suggested it would be helpful to provide an introductory health warning that the resources in the toolkit are optional and not endorsed by the Welsh Government.

Table 6 [1] Due to rounding, percentages may not always appear to add up to 100%.						
(n = 115)	Not answered	1 'not at all'	2	3	4	5 'very'
How useful do you find the toolkit in supporting the practical application of the anti-bullying guidance?	17 (14.8%)	1 (0.9%)	6 (5.2)	31 (27%)	49 (42.6%)	11 (9.6%)

Participants raised important considerations around consistency of message and language. At the most basic level, they felt cross-references from the guidance to the toolkit resources need to be accurate. More importantly, they felt that the Welsh Government needs to ensure that, as a general principle to avoid confusion, information found in the toolkit resources must be consistent with that in the guidance. However, concerns were expressed that the Welsh Government did not have direct editorial control over many of resources currently available via the toolkit. They also argued that a brief

introductory overview is needed of any organisation responsible for a resource included in the toolkit and its particular stance on anti-bullying issues.

Where they expressed a view, most were of the opinion that the toolkit headings should match the guidance chapter headings to reduce confusion.

'The sections are useful but I'm not sure why they don't match the chapter headings in the guidance.'

'Ensure the titles of the resources in the toolkit are consistent with those in the guidance.'

They welcomed the fact that the toolkit would be open access and acknowledged that whilst Hwb will be familiar to practitioners, they suggested that the landing page needs introductory text for first time users which should state that they need to read the anti-bullying guidance before using the online toolkit to have a fuller understanding. To facilitate this, they recommended having reciprocal hyperlinks from the toolkit to the relevant chapter of the guidance. They also identified the need to consider how to promote the toolkit to non-education based staff e.g. school nurses, youth workers, counsellors etc.

They felt that most of the toolkit's current content is more relevant for senior leaders and that teaching resources are lacking. Where classroom resources are included (e.g. card activities) they need supporting information for teachers about how to use and adapt the resource for different ages. Participants felt that the content needs rationalising to make it easier for users to identify the most appropriate resource quickly. Suggestions given to distinguish content were to use sub-headings to separate guidance-related documents from teaching resources and to add a brief thumbnail summary of each resource.

Also, for each resource/document on the toolkit, they felt it is important to identify the target audience(s) e.g. for staff professional development or for use in the classroom with pupils. They also stressed the need for the content of the toolkit to be kept updated regularly to remain current and relevant. Participants inquired as to how updates about new toolkit resources will be communicated to schools and other stakeholders. They also asked if similar toolkits will be developed for each sector including governors and parents/carers. If so, how will parents and other stakeholders be informed?

Examples of positive feedback included:

'It's positive having all the resources in one central place.'

'In the brief time we could access the toolkit it appeared user-friendly and easy to navigate. It's easier to navigate than most Welsh Government sites.'

'It's great that the resource is live and up-to-date.'

Less favourable comments included:

'When finished there may be too much content and so time-consuming to find the item you are looking for.'

'Too confusing, too much content, too many links resulting in a feeling of drowning, being overloaded and swamped with information. From a head teacher's perspective, how will they be able find and select the most appropriate/helpful resource or advice quickly?'

'The menus are straightforward but it still might require a bit of time to find the correct document.'

'The website seems over-filled with links and policy docs; can be daunting.'

'The resources need guidance notes to explain how they can be used.'

'The toolkit needs to be more focused on resources for teachers to use with learners.'

'It does not particularly reinforce the content of the guidance; teachers need access to classroom resources.'

'Use sub-headings to organise content plus a brief summary/description of each resource not just a hyperlink based on the document's title.'

Approximately one quarter of participants (27.8%) were satisfied with the accessibility of the toolkit – see table 7. They felt that it was helpful to know what supporting resources are available for each section of the guidance, and useful to have a balance of guidance-related documents and classroom resources.

Table 7

(n = 115)	Not answered	1 'not at all'	2	3	4	5 'very'
How accessible do you find the toolkit?	30 (26.1%)	8 (7%)	14 (12.2%)	31 (27%)	20 (17.4%)	12 (10.4%)

They stressed the need to ensure the requirements of the new curriculum are fully considered when selecting resources. They also emphasised that any resources will need to link with the four core purposes and be cross-referenced to the six Area of Learning Experiences (AOLEs) where appropriate, in particular the Health and Well-being AOLE, and the Relationships and Sexuality Education (RSE) curriculum.

A small minority of participants felt that the toolkit's content was less accessible. The main source of criticism was the range of images used, mainly showing young people using

digital devices. They suggested using a more diverse range of images across the toolkit to reflect the different types of bullying and communities in Wales, as well as a wider age range and gender balance. They also suggested that the language used in the toolkit and resource documents needs to be inclusive and promote equality. Similarly, the Welsh medium groups stressed that all resources in the toolkit, and where practicable the links, must be available in Welsh.

'Need to make the images inclusive so that all sectors of the community are represented.'

'Looks good but do the photos represent a diverse range of people?'

'Are the images representative of society? For example, children with disabilities and children from different cultures.'

Other feedback focussed on design elements, in particular that the font used was too small and the grey text was difficult to read against a white background. They suggested using smaller images to provide more space for text in a larger font. Other suggested improvements included:

- provide an audible function for those hearing impaired users
- assess the literacy levels to make the content accessible to parents/carers
- ensure the toolkit is compatible with screen reading software e.g. JAWS
- provide a search function
- include a facility for users to suggest additional resources and links
- develop a 'mobile/tablet friendly' version of the toolkit
- consider developing content in a range of ethnic minority languages

Suggestions for additional content included:

- a greater focus on resources to support preventative activity, relationship building, resilience and conflict resolution
- case studies of good practice in terms of schools providing anti-bullying support
- film clips of young people describing their experiences and explaining how their teachers/school supported them and the outcomes.

3.2.b Specific types of bullying and prejudice-related bullying

Three resources from the 'Specific types of bullying and prejudice-related bullying' section of the toolkit were reviewed namely:

- Approach to sexual bullying (Womankind)
- Tips for tackling discriminatory bullying (Equality and Human Rights Commission)
- Identity-based bullying: what teachers need to know and top tips for using the Public Sector Equality Duty (Children's Commissioner for Wales)

Resource 1: Approach to sexual bullying (Womankind)

Table 8						
Resource **(n = 54)**	**How helpful do you find this resource?**					
	not answered	1 'not at all'	2	3	4	5 'very'
Approach to sexual bullying	3 (5.6%)	15 (27.8%)	20 (37%)	8 (14.8%)	8 (14.8%)	0 (0%)

Approximately two thirds of participants (64.8%) did not feel this resource was helpful – see table 8. A common criticism was the title of the document (and the name of the organisation responsible for its production), 'Womankind' was perceived to use 'loaded language', implying that the information only refers to women. Participants felt such a resource should be relevant to all individuals, be gender neutral and use more inclusive language. They also felt it should state clearly that sexual bullying is never acceptable.

A key objection was that the document does not relate to the Welsh policy context. For example, they felt such a resource should relate to the Welsh Government's Strategic Equality Plan and equality objectives, and refer to the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 which requires every regional safeguarding area to have a Violence against Women, Domestic Abuse and Sexual Violence local strategy. Similarly, such a resource needs to reference the requirement to teach about healthy personal relationships in Wales.

'We have serious concerns regarding this document. We feel it poses more concerns than being a useful tool for anti-bullying. We believe a lot of this information would fall within criminal behaviour and should not be the responsibly of a school anti-bullying policy.'

'A step back in time, a boring looking document that should not be in the toolkit.'

'The definition of sexual bullying uses gender and sexuality interchangeably when they are different issues.'

'Sexual touching is abuse and the anti-bullying policy should give it the weight it requires.'

The minority however found the single A4 information sheet to be useful, brief and concise. They thought the definition of sexual bullying was clear and felt the resource gave schools direction as to how they should respond to sexual bullying. Whilst useful examples were provided participants felt however that there was a need to relate the text to all - boys, girls, LGBT, non-binary and transgender young people. They also suggested including examples of sexual name calling which refer to boys, LGBT, non-binary and

transgender individuals to reinforce that this issue is relevant to all young people. Giving the document a more informative title would be helpful, as would adding brief information about Womankind and a link to the organisation's website as a footnote to give a clearer context for the document.

Resource 2: Tips for tackling discriminatory bullying (Equality and Human Rights Commission)

Approximately two thirds of participants (66.7%) found this resource helpful and appropriate for the full range of educational settings – see table 9. The layout was considered to be user friendly and the language assertive e.g. the use of 'must'. The explanation of the PSED was welcomed, as was the emphasis on developing a whole school approach and the practical advice. However, while the PSED refers specifically to the protected characteristics, some participants reasoned that diversity and personal identity goes beyond this, for example, goths, vegetarians etc. The document also introduces and focuses on discriminatory bullying whereas the guidance mostly uses the term 'prejudice-related bullying', which they felt could result in confusion for the reader.

'There is a disparity in terminology; Welsh Government use prejudice-related bullying whereas the Equality and Human Rights Commission use identity-based bullying.'

Table 9						
Resource (n = 54)	**How helpful do you find this resource?**					
	not answered	1 'not at all'	2	3	4	5 'very'
Tips for tackling discriminatory bullying	4 (7.4%)	0 (0%)	3 (5.6%)	11 (20.4%)	36 (66.7%)	0 (0%)

Participants felt there is a need to clarify the purpose of the resources available in the toolkit; whether they are primarily to develop teachers' knowledge and understanding of the particular issue or to support learning in the classroom. Some participants suggested that this resource would be complemented by having additional resources to use in the classroom to discuss discriminatory bullying with pupils. Examples of feedback included:

'This document is fine. We feel however that it would be enhanced if it had links to online classroom resources.'

'A clear definition of discriminatory bullying is needed as well as a section that links with the curriculum and with teaching resources.'

'The document could signpost more clearly as to where to get additional resources.'

'The use of the word 'banter' in this resource could be in conflict with how this word is used in the guidance. Parents may defend their child's actions as banter.'

Resource 3: 'Sam's Story – it will get better' (Children's Commissioner for Wales)

Table 10						
Resource (n = 54)	**How helpful do you find this resource?**					
	not answered	1 'not at all'	2	3	4	5 'very'
Sam's Story; identity-based bullying: what teachers need to know and top tips for using the Public Sector Equality Duty	14 (25.9%)	1 (1.9%)	12 (22.2%)	27 (50%)	0 (0%)	0 (0%)

Participants provided mixed feedback about this resource. Whilst the explanation of the PSED was welcomed, some felt further discussion was required as to 'what identity actually means?' Their view was that, as well as the protected characteristics, it also includes an individual's cultural, social and economic background. Consequently, identity-based bullying they reasoned should also include bullying due to social background. Concerns were also raised about the inclusivity of language used in the document. Examples of feedback included:

'We believe that any resource included in the online toolkit needs to be very sensitive and ensure all aspects of equality are addressed. Examples given in this resource refer to girls being subjected to unwanted touching but should ensure it covers boys as well.'

'The definition of identity-based bullying is good but the example only refers to girls. It should refer to anyone being subject to unwanted touching.'

'Girls being subjected to unwanted sexual touching is not bullying. It is illegal and teachers should act appropriately i.e. do not treat sexual harassment or assault as bullying.'

'If a child is targeted due to their ethnicity then it is a hate crime not bullying.'

Some participants found the resource's title *'Sam's Story – It will get better'* to be misleading as they anticipated having a resource which could be used to discuss identity-based bullying with pupils in the classroom. Also, as with the previous resource, the document introduces and focuses on the term identity-based bullying whereas the guidance mostly uses the term 'prejudice-related bullying' which could result in confusion for the reader.

Another example of a mismatch with the guidance highlighted was that the resource states that for 2017–2019 the Equality and Human Rights Commission in Wales will be monitoring action taken by local authorities to address identity-based bullying in schools. Section 14 of the anti-bullying guidance *'Recognising bullying – reporting, recording, and monitoring'* however does not describe any such requirement for schools to report incidents of identity-based bullying to their local authority. Participants therefore queried the statutory reporting requirements required of local authorities and highlighted the practical challenges of monitoring identity-based bullying by local authorities. Schools have their own strategic equality plans which it was reported vary widely, therefore participants felt it is very difficult to collate and analyse data at local authority level.

3.2.c   Responding when bullying occurs

Four resources from the 'Responding when bullying occurs' section of the toolkit were reviewed namely:

- Bullying incident recording form (Welsh Government)
- Online bullying incident recording form (Welsh Government)
- Choose Respect (Anti-Bullying Alliance)
- Tackling racism in schools factsheets (Welsh Government and Show racism the red card)

Resource 1: Bullying incident recording form (Welsh Government)

Feedback was split when participants were asked '*How helpful do you find this resource?'* - see table 11.

Table 11						
Resource (n = 61)	Not answered	1 'not at all'	2	3	4	5 'very'
Bullying incident recording form	3 (5%)	3 (5%)	15 (25%)	19 (31%)	16 (26%)	5 (8%)

Approximately one third (34%) felt the resource was helpful and relatively easy to complete. They reasoned, if guidance instructions were provided on when and how to complete the form, this would potentially lead to more consistent recording of bullying

incidents within and across schools. They suggested that the bullying reporting form should be available on schools' information management systems to track vulnerable pupils, especially if they move schools. Examples of positive feedback included:

'Need a standardised bullying reporting form for all schools.'

'This form needs to be part of a school's recording procedures.'

'Helpful if used consistently and all of the form is completed. Shouldn't be optional.'

'The tick box format is good; less time consuming but can add extra information if needed.'

'To achieve greater consistency, provide a generic, national bullying report system with financial support to implement effectively.'

Approximately one third (30%) of participants however, did not find the form to be helpful. They questioned its manageability and expressed concerns as to how the form would be made available to staff and stored whilst retaining learner confidentiality, especially given GDPR regulations. They also felt the form needed adapting to record the actions needed to prevent similar future incidents.

'Need 'Next step' guidelines on the form – what information gets passed on and to whom e.g. to the governors?'

'Follow-up actions and outcomes need to be monitored and recorded.'

Specific questions posed included:

- What is 'the serious incident protocol'?
- How is the information stored in the pupil's file?
- Can this information be shared with parents/carers?

Resource 2: Online bullying incident recording (Welsh Government)

Once again feedback was divided when participants were asked '*How helpful do you find this resource?*' Approximately one quarter (24%) felt the resource was helpful – see table 12.

Table 12						
Resource (n = 61)	Not answered	1 'not at all'	2	3	4	5 'very'
Online bullying incident recording form	16 (26%)	9 (15%)	9 (15%)	12 (20%)	10 (16%)	5 (8%)

Conversely, 30% of participants did not find the resource helpful. They questioned the need to have a separate form for online bullying and, by extension, speculated if it would be necessary to have separate forms for every other type of bullying. This is in turn would result in increased workload and duplication of information.

'Too much work for staff to complete both forms; not sustainable.'

'Is there a need for a separate form? We feel the online bullying form should not be separate.'

Many were in favour of having a single standardised bullying incident reporting form to avoid duplication and inconsistencies in wording across the two forms. They also suggested having an electronic version with drop-down menus. If two separate forms are retained, they stressed that the format and terms used need to be consistent across both and instructions need to be provided on when and how to complete the forms.

Specific concerns raised and questions posed included:

- Such forms need to be accessible to a range of staff; however this has implications for confidentiality. Where will they be stored and who will have access to them?
- How does this form link with a school's safeguarding protocols?
- How will the form be reviewed and by whom? How will patterns of behaviour be recognised?
- What provision is available to record an incident if the bullying is not pupil on pupil but teacher on pupil?[1]

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[1] The reporting of such incidents is beyond the remit of the draft guidance.

Resource 3: Choose Respect (Anti-Bullying Alliance)

Table 13						
Resource (n = 61)	Not answered	1 'not at all'	2	3	4	5 'very'
'Choose Respect' (Restorative Practice[2])	8 (13.1%)	6 (9.8%)	6 (9.8%)	14 (23%)	26 (42.6%)	1 (1.6%)

Of those participants who expressed an opinion, the majority (44.2%) felt that this was a helpful introduction to restorative practice, and the examples given of restorative questions were particularly useful. Those who felt otherwise did so mainly because the resource was not linked to the Welsh context, was not available bilingually and the target audience was unclear.

'Not Wales specific. As an English sourced document there is no reference for to the All Wales School Liaison Core Programme. Will need to be adapted to link with the Welsh Government anti-bullying guidance '

'The resource will need to be in Welsh for us to be able to use it.'

'It would be a '5 – very helpful' if the resource was available in Welsh; but wouldn't use as not in Welsh.'

'Very useful but is essential that it is available bilingually.'

Participants identified a need for staff to be trained in restorative practice if the approach is to be adopted successfully which in turn raises funding issues. They also felt that the coordination of a restorative approach within a school needs to be a specific role.

'It would be useful to have a resource like this to share with staff to raise awareness.'

'We like the optimistic mind set – an emphasis on the positive.'

Other suggested improvements included:

- further guidance to explain as when to or when not to use restorative approaches
- provide a flow chart for staff showing the procedures to follow and a script for staff to follow

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[2] The hard copy versions of this resource used in Workshop 2 were stapled in the incorrect order which in turn may have had a negative impact on some participants' perceptions of the resource.

- add a section about monitoring the situation
- the scenario reinforces stereotypes and will need updating regularly
- the language and terminology used is secondary school specific e.g. form teacher
- it would be advantageous to have supporting pupil materials and posters

Resource 4: Tackling racism in schools factsheets (Welsh Government - Show racism the red card)

Many participants did not provide feedback on this resource due to the limited amount of time available in the workshop. The majority of those participants that expressed an opinion (34.5%) found the exemplar factsheets from this resource, namely '*Language and Terminology: An introduction for Teachers'* and '*Reporting suspected racist incidents in school'* helpful, informative and a useful point of reference for updating staff – see table 14. On the '*Reporting suspected racist incidents in school'* factsheet, they particularly liked the flow chart '*a visual guide to reporting racism'* which they found easy to follow.

Table 14						
Resource (n = 61)	Not answered	1 'not at all'	2	3	4	5 'very'
Tackling racism in schools factsheets	26 (42.6%)	2 (3.3%)	7 (11.5%)	5 (8.2%)	12 (19.7%)	9 (14.8%)

A minority were unsure of the resource's target audience and found the full colour design difficult to read, and a potential barrier to its use.

'A little unclear who is the target audience – the colours suggest learners, but the language suggests staff?'

'The fonts and background colours are not dyslexia or colour blind friendly.'

'Schools will print in black and white anyway which would not be easy to read.'

'Need to have more accessible language and an easy-read version for use with pupils.'

3.3   Suggestions for additional resources

Finally when asked *'Are you aware of any particularly good resources that should be included in the final toolkit?'* participants identified the following:

- All Wales School Liaison Core Programme; the teacher's section of the SchoolBeat website has information on behaviour incident management in schools and the support available from School Community Police Officers.
  http://www.schoolbeat.org/en/teachers/behaviour-incident-management/
  http://www.schoolbeat.org/cy/athrawon/rheoli-digwyddiadau-ymddygiad/

- The Child Exploitation and Online Protection Command (CEOP)
  https://www.ceop.police.uk/safety-centre/

- Emotional literacy support assistant (ELSA) https://www.elsa-support.co.uk/

- ENABLE (European Network Against Bullying in Learning and Leisure Environments) social and emotional learning (SEL) with peer support anti-bullying project and resource pack http://enable.eun.org/

- Friends for life - a social skills and resilience building programme for children aged 8-11 https://www.friendsresilience.org/friends-for-life-ages-8-11/

- International Institute of Restorative Practices (IIRP) resources and website
  https://www.iirp.edu/

- KiVa Anti-bullying Programme; the licensed partners in Wales are Early Intervention Wales Ltd. (EIWT) based within the School of Psychology, Bangor University
  http://www.kivaprogram.net/
  http://www.kivaprogram.net/wales
  https://www.bangor.ac.uk/psychology/cebei/index.php.en

  'The KIVA programme has not been translated into English for Key Stage 3 and 4 so no continuity across all stages of education.'

- Prevent4schools (P4S) (primary and secondary) http://www.preventforschools.org/

- SEAL resources for primary schools (Welsh Government)

  https://learning.gov.wales/resources/browse-all/seal-for-primary-schools/?lang=en
  https://learning.gov.wales/resources/browse-all/seal-for-primary-schools/?skip=1&lang=cy

- Show Racism the Red Card https://www.theredcard.org/education

- Stonewall Cymru: LGBT learning resources, lesson plans and story books
  https://www.stonewallcymru.org.uk/

- Welsh Women's Aid sexual harassment guidance

  http://www.welshwomensaid.org.uk/information-and-support/what-is-sexual-harassment-and-stalking/