

Wales Needs Stronger Action to Prevent Bullying

Key Messages

- Evidence from children and young people in Wales consistently shows that approaches to tackle and prevent bullying need to be more effective. Bullying is a safeguarding issue that harms children's wellbeing and a strong response is needed on a national level to make change.
- Government must introduce a duty to record bullying in schools as an essential part of an effective anti-bullying approach.
- New anti-bullying guidance – the re-drafted Respecting Others - should be linked to Estyn's Self-Evaluation for Improvement to enable a system-wide improvement of the effectiveness of anti-bullying policies and approaches.
- The re-drafted Respecting Others anti-bullying guidance needs to be integrated with other whole-school approaches to wellbeing

Introduction

The current redevelopment of Welsh Government's Respecting Others guidance is an important opportunity to integrate a preventative anti-bullying approach into the wider educational reforms in Wales. In this position paper I outline how this can be done and why this important opportunity must be taken.

A Priority for the Children's Commissioner for Wales

The Children's Commissioner for Wales' principal aim is to safeguard and promote the rights and welfare of children. Since the establishment of the Children's Commissioner's office, every single Commissioner has championed the need to take more effective approaches and strategies across Wales to prevent and tackle bullying. Improving the response and approach to bullying remains a key priority for my own term as Commissioner.

What do children and young people say?

In my 2015 nationwide consultation *Beth Nesa*, I engaged with over 6000 children and young people and bullying was identified as the top priority for change by both the 7-11¹ and 11-18² age range. My subsequent 2018 nationwide consultation of over 10,000 children and young people further shows that bullying remains a serious and significant concern³. Both these surveys are reinforced by the Health Behaviour in School Aged Children survey in Wales, which found that almost one in five young people state they have taken part in bullying in the past couple of months and over a third of young people state they have been bullied in the past couple of months.⁴

In addition to being a common concern, bullying has profound impacts for children and young people. In my 2017 report *Sam's Story: Listening to Children and Young People's Experiences of Bullying in Wales*⁵, over 2000 children and young people shared their own portrayals of the experience of bullying. Analysis of these showed several key messages from children and young people about their experiences and informed the 18 recommendations I made in my *Sam's Story* report, several of which relate directly to the re-draft of the Respecting Others guidance. I have also made recommendations about anti-bullying approaches in my last two Annual Reports^{6 7}, both of which were accepted by Welsh Government.

What has been done nationally to make change?

It is crucial that **Welsh Government turns acceptance of my recommendations into actions, and that this action is effective**. Each story and image shown in my *Sam's Story* report is a powerful reminder of the devastating impact bullying can have on the lives of individual children. A child that is at risk of or experiencing bullying needs safeguarding. A failure to understand bullying in

¹ <https://www.childcomwales.org.uk/wp-content/uploads/2016/05/What-Next-7-11.pdf>

² <https://www.childcomwales.org.uk/wp-content/uploads/2016/05/What-Next-11-18.pdf>

³ <https://www.childcomwales.org.uk/wp-content/uploads/2019/04/What-Now-Report.pdf>

⁴ <https://gov.wales/docs/caecd/research/2015/151022-health-behaviour-school-children-2013-14-key-findings-en.pdf>

⁵ <https://www.childcomwales.org.uk/wp-content/uploads/2017/11/Sams-Story.pdf>

⁶ <https://www.childcomwales.org.uk/wp-content/uploads/2018/09/Annual-Report-2017-18.pdf>

⁷ <https://www.childcomwales.org.uk/wp-content/uploads/2017/10/A-Year-of-Change-CCFW-Annual-Report.pdf>

this way leads to inadequate approaches and responses and these deny children their protective rights as guaranteed by the UNCRC. Human rights are indivisible and a child that is not sufficiently protected can struggle to access their other rights to survive and thrive, to receive an education, to be listened to and to fulfil their potential.

As Commissioner I have sought to offer active solutions to address bullying in the two year period Government has been re-developing the Respecting Others guidance. In addition to my *Sam's Story* consultation and report, my office worked with schools to create five anti-bullying schemes of work differentiated by age (covering Foundation Phase to Key stage 4) and published with all accompanying resources^{8 9}. These were launched to coincide with anti-bullying week 2017. Within six months the primary school resources had 10,640 downloads and the secondary resource was downloaded 1439 times. During Safer Internet Week 2019 my office launched *Don't Worry, I'm Here for You: Children and Young People's Experiences of Cyberbullying in Wales*¹⁰. This report highlighted key findings from my 2018 consultation about cyberbullying and is accompanied by three differentiated Action Packs, developed with young people to enable peer-led change.

The Respecting Others re-draft is the **primary concrete action** Government has taken during my term to tackle and prevent bullying. There is much that was in the re-drafted consultation document that was positive and I particularly welcome the inclusion of both a bullying incident recording form and an online bullying incident recording form. But this guidance is non-statutory and advisory and this means that schools have a choice about whether to implement the guidance or not. Government needs to go much further to make real changes that will affect children and young people's lives.

What actions should Welsh Government take to make effective change?

⁸ <https://www.childcomwales.org.uk/our-schemes/primary/useful-resources/>

⁹ <https://www.childcomwales.org.uk/our-schemes/secondary/useful-resources/>

¹⁰ <https://www.childcomwales.org.uk/dont-worry-im-here-for-you-children-and-young-peoples-experiences-of-cyberbullying-in-wales/>

1. Government must introduce a duty to record bullying in schools

The key recommendation of my *Sam's Story* report, a recommendation made in conjunction with the Equality and Human Rights Commission, was that *'Welsh Government should place a statutory duty on schools to record all incidences and types of reported bullying. This will require a clear definition of bullying, formed following full consultation with children and young people.'*

The guidance is clear that recording instances of bullying is an essential part of an effective response. But it is unfair to children that recording incidents remains entirely optional for schools due to the advisory status of the guidance and the lack of obvious linkages with statutory mechanisms. There must be a stronger approach taken across Wales to better safeguard children and young people and recording should be part of this. Effective use of recording means that far better preventative and responsive work can develop at a school level and this means that fewer young people will bully, fewer will experience bullying, and responses to bullying will be more effective. I outline some ways in which recording is important:

- Recording all types of bullying incidences (online and offline) will enable schools to be **accountable** to children and young people. A key message from children consulted for both my 2017 and my 2019 reports into bullying and cyberbullying was that children and their families often feel that nothing is done and that bullying is not taken seriously in schools, as one young person stated, 'Teachers don't do that much about it'.¹¹ Young people in consultation have described that this perceived lack of response both fails to support those who are bullied and emboldens those who bully, so it exacerbates the problem. Recording incidences and the action taken in itself means that there is an instant response at a school level so children can see that their experience is not being ignored and that a record is being kept.
- Recording can also mean teachers can **monitor what is happening to an individual** child, both those who bully and those who are bullied. They can assess, over time, whether the actions they are taking in response are having an effect. Recording enables

¹¹ <https://www.childcomwales.org.uk/wp-content/uploads/2019/02/Dont-Worry-Im-here-for-you-childrens-experiences-of-cyberbullying-in-Wales.pdf>

communication between professionals in large school settings, and also between the home and the school. It ensures that professionals and carers are **working together** to address problems.

- Recording also enables schools to monitor a wider picture: they will be able to **inform their preventative approach** with real data, they will be able to pick up themes and features of bullying that they need to address across the whole school.
- Through effective monitoring and preventative action schools will be able to **better perform the Public Sector Equality Duty under the Equality Act 2010** by recording and disaggregating incidents in relation to protected characteristics. This can then be used to review equality objectives and **address the direct discrimination** faced by some children and young people through bullying. It is essential schools do this work: *The Human Rights of Children in Wales: An Evidence Review*¹², shows that both children and professionals report high levels of racist, sexist, homophobic and transphobic language and bullying in schools. There is a dearth of information about disability-related bullying but my consultations with children and young people suggests this also occurs.
- It will enable schools to **better evaluate** their anti-bullying approach, both to **find strengths and to identify policies or practices that need to change**. Following this approach will enable schools to test new approaches and to evaluate their effectiveness with real information.

The process and tools in the developing Respecting Others guidance could be a very helpful part of a recording requirement. I would accept that schools could be working to their own, collaboratively decided, definitions, as outlined in the draft guidance, as I am not calling for system-level reporting, but for effective school level recording, which can be used for evaluation. This should be part of the honest, reflective approach to school evaluation that is being developed by Estyn with the OECD and should fit into a new accountability system recommended

¹² <https://www.childcomwales.org.uk/wp-content/uploads/2018/10/The-Human-Rights-of-Children-in-Wales.pdf>

in the 2018 independent review of Estyn¹³. Central to Professor Donaldson’s recommendations in this report is a system-level evaluation that supports improvement and does not hold schools to account in a way that drives behaviours that are inimical to children. **My call is for recording at a school level rather than reporting or publishing statistics; it is about schools taking action to support their learners and uphold their rights and not about publishing targets or monitoring that could be a disincentive to raising bullying concerns.**

The developing changes to accountability mechanisms as part of the educational reform process show that the conversation around school and system wide accountability has developed significantly since my publication of my recommendation around recording in 2017. At that time I was given a response from Government that suggested recording could lead to unintended consequences through reporting mechanisms, but this response reflected the context of a high-stakes accountability system in which data has been used crudely to rate schools. Government has assured me this context is changing and it is time now to reconsider how they can act on this recommendation using the new tools that are being developed by Estyn and the OECD, and in accordance with new principles for school and system-level accountability.

2. The Respecting Others Guidance should be linked to Self-Evaluation for Improvement

Welsh Government should consider how there will be system-wide improvement of the effectiveness of anti-bullying policies and approaches. The status of the Respecting Others guidance is that it gives advice and suggestions to schools, which they can choose to ignore. Given the widespread and serious impact of bullying, and given that Government describe guidance as the ‘foundation of their approach to tackle bullying’, this isn’t a strong enough response. Currently there are no plans to give additional support to schools to implement the guidance or to evaluate uptake, and there is no indication that this draft will be more effective than the previous version of this guidance. And many teaching professionals did not know this previous draft existed. An approach to anti-bullying that involves the whole school community

¹³ <https://www.estyn.gov.wales/sites/default/files/documents/A%20Learning%20Inspectorate%20-%20en%20-%20June%202018.pdf>

is the right approach to take; this is well-evidenced as an effective way to reduce bullying.¹⁴ However, as outlined by the Public Policy Institute for Wales, evidence suggests that the implementation of whole school approaches, particularly those that coherently integrate anti-bullying work with other approaches to support wellbeing and mental health can be challenging.¹⁵ It should be recognised that for many schools implementing the Respecting Others guidance will require a culture shift supported by professional learning and clear leadership, leading to significant changes in practice. Schools will not prioritise this without support or clear direction.

There is therefore an opportunity for Government not only to develop a supportive roll-out plan but also, at a level of national implementation, there is an excellent opportunity to strengthen this guidance by incorporating the practice described in sections 9 and 10 into the Self Evaluation For Improvement framework currently under development by Estyn and the OECD. If this framework requires schools to evaluate their anti-bullying practice in line with the approach outlined, there is a clear expectation that schools should incorporate the practice advised in the guidance into their wider approach to wellbeing, including embedding preventative approaches into their curriculum. Developing an understanding of the principles, rationale and approach laid out in this guidance would then also become a necessary component of professional learning, as all teaching professionals develop their understanding of the requirements of the evaluation framework. This then has the potential to generate the widespread, and in some cases profound, changes that are needed for children and young people's experience of bullying to actually change.

3. Anti-bullying guidance needs to be integrated with other whole-school approaches to wellbeing

¹⁴ <https://www.wcpp.org.uk/wp-content/uploads/2018/04/PPIW-Report-Promoting-Emotional-Health-Well-being-and-Resilience-in-Primary-Schools-Final.pdf>

¹⁵ Ibid.

The Respecting Others guidance isn't integrated into other initiatives and developments around whole school approaches to wellbeing. Rather than the guidance being one component of a wider approach it appears this guidance has been developed separately from the following:

- the Health and Wellbeing Area of Learning and Experience;
- the Online Safety Action Plan;
- Work developed by the Joint Ministerial Task and Finish Group on a Whole-School Approach to Emotional Well-being and Mental Health;
- the Self Evaluation for Improvement Framework being developed by Estyn and the OECD, which includes a strand on evaluating wellbeing.

It is challenging for these areas to explicitly cross-reference each other when they are all under development but my concern is that the Respecting Others guidance has been developed in isolation of these other areas of work and therefore may not form part of a coherent whole-school approach. This is unhelpful for schools, who may struggle to make any changes in response to Respecting Others if this work is not supported or encouraged by other changes to whole-school approaches. Bullying should not be seen as a separate issue to wellbeing, and if anti-bullying is not explicitly included in whole-school approaches then children and young people will be failed because their experiences clearly show that preventing and tackling bullying is a widespread concern and should be a priority. This is not least because there are evidenced links between bullying and poorer outcomes in mental health and wellbeing and these can have devastating consequences, with young people that both experience and participate in cyberbullying at a greater risk of both self-harm and suicidal behaviours.¹⁶

Consequently, I urge government to consider how anti-bullying work features in related policy areas around whole-school approaches to wellbeing and how Respecting Others will be linked. Schools will be required to develop work in response to these several other policy areas (such as the new curriculum or the new evaluation framework) whereas there will be no requirement for schools to develop work in response to Respecting Others. I have already outlined a possible

¹⁶ John et al Self-Harm, Suicidal Behaviours, and Cyberbullying in Children and Young People: Systematic Review J Med Internet Res 2018 | vol. 20 | iss. 4 | e129

suggestion for how this guidance could be integrated into new self-evaluation but consideration needs to be given to how all of these approaches form a coherent system. If these other approaches are not drawing on and utilising the Respecting Others guidance, then they will either be suggesting different approaches to anti-bullying (which will supersede the approaches in Respecting Others and render the guidance obsolete) or anti-bullying will not feature, which would be a significant gap in a whole-school approach.

Next steps

Young people and children are repeatedly giving a clear message that more needs to be done to prevent and tackle bullying. Too often children and young people feel that bullying is not taken seriously by adults and that nothing is done when they report it. The lack of a strong national approach indicates that this inaction is reflected at a Government level.

I will continue to push for Welsh Government to develop a strong national approach and to strengthen the impact of new guidance by linking it to the evaluation framework, which must include **a duty to record and monitor bullying**. Schools need to gather this information to be accountable to children and to evaluate and improve their anti-bullying approach and response.

Bullying has serious and long-lasting impacts: it prevents children and young people from experiencing their human rights, including their rights to be safe and to have an education. At the moment the law doesn't require schools to record and monitor bullying but our young people in Wales do. Government must link the new guidance to a clear **duty to record bullying in school-evaluation** to ensure this happens.