Education Inspection Framework 2019: inspecting the substance of education
Response to Ofsted from the Anti-Bullying Alliance

About the Anti-Bullying Alliance

The Anti-Bullying Alliance (ABA) is a unique coalition of over 140 organisations and individuals which aims to unite against bullying and create safer environments in which children and young people can live, grow, play and learn. ABA forms part of the National Children's Bureau.

This response has been developed with input from ABA's Core Members and Advisory Group. Our Advisory Group consists of NSPCC, The Diana Award, Childnet / UK Safer Internet Centre, Kidscape, Stonewall, Mencap, NASUWT and Wandsworth Council.

The bulk of our response focuses on the quality of the research and the proposed School Inspection Handbook. In addition to this response, we support the wider National Children's Bureau response.

Summary

Pupils experiencing bullying are highly unlikely to be learning at their full potential and are more likely to have poor wellbeing well into adulthood. Therefore, we welcome the commitment from Ofsted to look more closely at the wellbeing of pupils and levels of bullying when carrying out inspections. We are, however, concerned that the proposed framework does not go far enough to emphasise the barrier to learning and wellbeing that bullying presents, or to really scrutinise all the potential data and evidence available in schools that could indicate a problem or otherwise with bullying.

Schools can feel reluctant to share experiences of bullying for fear of reprisals and how this will reflect on their practice. We need to champion honesty and those schools that are taking clear action to both prevent and respond to bullying. Our response is divided in to three sections:

- An analysis of the research relating to bullying

- Our recommendations about the draft framework

- Our recommendations about the draft School Inspections Handbook

We have made 17 key recommendations highlighted below. The main themes of these recommendations are as follows:

- Encouraging schools to be more open about levels of bullying in their schools and to collate appropriate data and evidence

- Inspector awareness of groups most at risk of experiencing bullying

- Inspections focusing on bullying as a barrier to learning and on the significant impact bullying has on a person's wellbeing well into adulthood

- Ensuring inspectors are scrutinising data and evidence more effectively

- Encouraging schools to have a whole school strategy to anti-bullying, where confidence in the approach is high

What does the research tell us?

We have considered the research report that underpins the proposed new framework and have written below the key evidence we believe is missing.

Some groups are more at risk than others are

Government research shows that 40% of pupils at year 10 have experienced bullying in the previous 12 months[1]. Bullying can happen to any pupil and is often targeting perceived difference; there are however, some groups more at risk.

We were pleased to see cited within the research briefing that children with a protected characteristic are more likely to experience bullying. However, we were disappointed not to see a specific reference to disabled pupils. Research shows that disabled pupils and those with SEN, are twice as likely to experience bullying in school[2]. Young carers[3], Looked After Children[4], Gypsies, Roma and Traveller children[5] and those who bully others are also more likely to experience bullying.

Recommendation 1: We would like to see recognition of the higher risk of bullying that disabled pupils and those with SEN, Gypsies, Roma and Traveller children, Looked After Children and young carers experience.

Bullying is a significant barrier to learning

We were pleased to see an acknowledgement of the impact that bullying has on attainment; that being bullied during the later years of primary school has a strong association with lower attainment in secondary school.[6] Bullying can create 'a school phobia', making it almost impossible for children to reintegrate back into school life[7]. Government commissioned research from 2010 showed that young people who had been bullied had significantly lower Key Stage 4 results than those who had not been bullied – the equivalent of two GCSE grades[8].

Bullying has a substantial impact on mental health and wellbeing of pupils

Bullying not only affects the attainment of the children who experience it, but it has a significant impact on their mental health and wellbeing long into adulthood. We do not feel the research report referenced this enough.

Recommendation 2: We would have liked to see more in relation to the strong longitudinal studies that evidence the impact of bullying on pupil wellbeing and the impact on a person's life well into adulthood

This would include:

[1] Longitudinal study of young people in England: cohort 2, wave 2 – Department for Education (2016)
[2] Pupil Wellbeing Questionnaire Wave One Results - Anti-Bullying Alliance (2015)
[3] The lives of young carers in England omnibus survey report: Research Report - Aldridge, et al (2017)
[4] Comparison of substance use, subjective well-being and interpersonal relationships among young people in foster care and private households: a cross sectional analysis of the School Health Research Network survey in Wales – BMJ (2017)
[5] 'Is Britain Fairer?': Key facts and findings on Gypsies, Roma and Travellers - Equality and Human Rights Commission (2016)
[6] Pupil and school effects on children's well-being. London: DCSF - Gutman L and Feinstein L (2008)
[7] The right to education in England: alternative report to the UN Committee on the Rights of the Child. Colchester: Children's Legal Centre - Anderson, K. and others (2008)
[8] Characteristics of bullying victims in schools - National Centre for Social Research (2010)

- Being a victim of bullying increases the risk of experiencing depression later in life by more than half. Bullying others increases the risk of becoming depressed by 30%[9].

- Bullying can lead to physical symptoms such as sleepless nights, bedwetting, abdominal pain and headaches, and psychological symptoms such as depression, self-harm, suicidal ideation and anxiety[10].

- 1 in 4 children worry about bullying[11]

- At its most serious, bullying can lead to the need for medical intervention. A study into users of child and adolescent mental health services (CAMHs) in London[12] found that 61.5% of participants reported being bullied. Another study found that half of 12-year olds who harm themselves were frequently bullied.[13]

- Bullying can have long-term consequences for later life. At the age of 40, adults who had been bullied at school were more likely to experience a range mental health issues, including suicidal ideation; earn less money; not be in employment, education or training; be obese; lack qualifications; and not be in stable relationships[14].

Schools role to play in reducing bullying

A shared understanding of bullying – it is vital that pupils, parents and all school staff (including contracted after schools / transport staff) have an understanding of what bullying is and is not. ABA have a clear definition of bullying. We were pleased to see that the research report showed a clear link between school culture and bullying levels. Research also shows other school factors that reduce the likelihood of pupils being bullied include:

- **A whole school approach underpinned by policies** – anti-bullying policies do not in and of themselves reduce bullying in school but they act as a framework for how school's respond to bullying. These policies (sometimes contained within a school's behaviour policy) rarely cover all aspects of anti-bullying to a satisfactory level[15]. Having a whole-school approach to tackling bullying led by SLT/governing body can be effective in tackling bullying[16].

- **Teacher training** – studies have shown that teachers awareness and understanding of bullying are predictors of levels of bullying in the classroom[17].

- **Curriculum** – studies have shown that weaving anti-bullying activity throughout the curriculum, including through PSHE / RSE, can help to reduce bullying in school[18].

- **Tackling bullying at times of transition and play** – bullying is more likely to happen at times of transition either on home to school transport or at break/playtimes. An effective playground policy and design of play areas[19], extra staff on home to school transport and training for bus and coach drivers could help to reduce rates of bullying[20].

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[9] School Bullying, Depression and Offending Behaviour Later on in Life - Farringdon, Losel, Ttofi et al. (2012)
[10] Systematic review of the effectiveness of interventions to promote mental wellbeing in primary schools. Report 3: Universal approaches with focus on prevention of violence and bullying. Warwick: University of Warwick. 106pp – Adi, Y. and others (2007)
[11] TellUs 4 – Ofsted (2010)
[12] Bullying experiences of child and adolescent mental health service-users: a pilot survey. Child Care in Practice, vol.13, no.4 (Oct). pp351-365. – Dyer, K. and Teggart, T. (2007)
[13] Bullying victimisation and risk of self-harm in early adolescence: longitudinal cohort study – Helen L Fisher and others. BMJ Online, (2012)..
[14] Takizawa R, Maughan B, Arseneault L. "Adult health outcomes of childhood bullying victimization: Evidence from a 5-decade longitudinal British birth cohort" is published in the American Journal of Psychiatry (2014)
[15] A content analysis of school anti-bullying policies in Northern Ireland. Educational Psychology in Practice, 32, 281-295. – Purdy, N. and Smith, P.K (2016)
[16] Evaluation of the Anti-Bullying Alliance's All Together Programme - Nathalie Noret & Ebony Collier
York St John University (2018)
[17] KiVa antibullying program: Overview of evaluation studies based on a randomized controlled trial and national rollout in Finland. International Jounral of Conflict and Violence, 6, 294-302 – Salmivalli, C. and Poskiparta, E. (2012)
[18] The Psychology of school bullying – Smith, P.K (2018)
[19] The Psychology of school bullying – Smith, P.K (2018)
[20] The Vodden Report – In the driver's seat (2015)

- **School ethos** – key to tackling bullying is a school with a clear expectation of how pupils should treat each other, modelled by staff and teachers that are responsive and supportive in a respectful manner[21]

Bullying prevention must start in the early years

Although not within the research, an important element to take into consideration is that children as young as 3 years old can display bullying behaviour[22]. Early years provision can provide a good opportunity to understand and influence how young children play together and communicate. Early years providers should consider the important role they have to play in promoting pro-social interactions. This is a key time to support children to learn the principles of inclusion and respectful behaviour and we welcome this being included in the draft Early Years Handbook.

Parent involvement

Ofsted's own Parent Voice website shows a worrying number of parents and carers saying that they either disagree or strongly disagree with the statement 'My child's school deals effectively with bullying' from January 2018 – 2019. These was the worst results from all the questions asked of parents. It was also the case that the highest number of parents said they 'didn't know' when answering this question. Parents support and confidence in dealing with bullying effectively is vital. They should understand how schools prevent and respond to bullying.

Recommendation 3: We would like more scrutiny of the data from the Parent Voice website looking at the responses with a more critical eye. For example, do outstanding schools have more parents saying they are more confident in the way schools deal with bullying?

The draft Framework

We support the changes in the draft Framework and welcome the inclusion of the following statement in paragraph 26:

- 'Relationships among learners and staff reflect a positive and respectful culture. Learners feel safe and do not experience bullying or discrimination.'

We believe this statement is stronger than in the current framework. However, as discussed above, there is a culture of schools not admitting to having any bullying in school which, as we have seen with the data above, is highly unlikely for any school. We want to avoid the current culture of schools under-reporting bullying for fear of being seen as a 'bad' school. We try to work with schools to encourage more critical thinking about school reported bullying levels. For example, a school with high reported levels of bullying may be a school that is not preventing and responding effectively, however it could also be a school, which has an open culture where pupils feel able to report and are confident it will be taken seriously.

Recommendation 4: In paragraph 26, we would like to see an acceptance that even the best anti-bullying schools will have some incidence of bullying but that good schools act quickly, respond appropriately and stop the bullying reoccurring.

We recommend that instead the following statement included in its place:

- 'Relationships among learners and staff reflect a positive and respectful culture. All learners feel safe, bullying and discrimination is rare in school and, when it does happen, the school takes appropriate and effective action to stop it reoccurring.'

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[21] Peer victimization and authoritative schools climate: A multilevel approach – Journal of Educational Psychology, 107,1186 (2015)
[22] Bully/victim problems among preschool children: a review of current research evidence Educational Psychology Review. 23(3). 329 - Vlachou, M., Andreou, E., Botsoglou, K., & Didakalou, E., (2011)

We support the inclusion of the new judgement of 'personal development' and welcome the focus on pupil wellbeing.

Recommendation 5: We believe paragraph 15 should fall under the 'protecting learners' section and should include more information about how providers should be meeting their duties under the Equality Act 2010.

This is especially important due to the increased risk of learners experiencing bullying if they have a protected characteristic.

Recommendation 6: We would like for the final bullet point under paragraph 28 to specifically reference peer on peer abuse.

The draft School Inspections Handbook

We are concerned to not see, despite the strong evidence about the risks bullied pupils face, that pupils who are most at risk of experiencing bullying had not been included under the 'Pupils who have particular needs' section.

Recommendation 7: We would like to see the following inserted after paragraph 189: 'Evidence shows that some pupils are more at risk of experiencing bullying than others. These groups include disabled pupils and those with SEN, children who are or are perceived to be LGBT, children from race or faith minority groups including Gypsies, Roma and Traveller children, Looked After Children and young carers. Inspectors will particularly focus on levels of bullying of those at most risk.'

We do not believe that the factor relating to bullying (paragraph 186) is strong enough. Schools need to do more than create an environment where bullying is not accepted. It needs to refer to the need for schools to have strong policies and an anti-bullying strategy in place.

Recommendation 8: We strongly recommend changing the bullying 'factor' in paragraph 186 to ensure that schools have a strategy in place to prevent and respond to bullying in school.

We recommend the following wording: 'An environment where pupils feel safe, in which there is a clear strategy to prevent bullying, underpinned by a policy understood by all staff, pupils and parents, and one in which bullying and discrimination are not accepted; responded to quickly, consistently and effectively.'

Recommendation 9: We want to see that inspectors are scrutinising wider data from schools that may relate to bullying such as reasons for exclusions and absence statistics under paragraph 197.

Under paragraph 197 we wish to see inspectors analysing data provided to them under paragraph 56 and comparing this against pupil feedback and data collected about bullying.

This should include pupil absence due to bullying, exclusions relating to bullying and surveys of pupils relating to bullying. Under the same paragraph, we'd also want to see the following factor added:

- 'evaluating the effectiveness of fixed-term and internal exclusion, including the rates and reasons for exclusion'

In the same paragraph (197) we would like to see the wording of bullet point 11 changed to say:

- 'gathering evidence about the typical behaviour of pupils who are not in school during the inspection, for example whether they have had fixed-term exclusions or internal exclusions in the two years prior to inspection or whether or not they have been experiencing bullying'

Recommendation 10: Pupils may have been off-rolled due to experiencing or perpetrating bullying, we want to see a recognition of this within paragraph 237.

Recommendation 11: We believe that under paragraph 199, in an inadequate school judgement, that bullet point 6 should be reworded to 'Incidents of bullying or discriminatory behaviour are frequent and schools do not take appropriate action to prevent or respond to incidents of bullying or discriminatory behaviour'.

This reflects the need to highlight that it is not just about the number of incidents in school but also about how schools prevent and respond to them.

Inspectors should be required to gather evidence of school staff training in relation to bullying including how confident they feel to prevent and respond appropriately to bullying in school. Related to this, we are keen to understand the training that Ofsted inspectors receive in relation to bullying to ensure that they are fully able to make judgements. The Anti-Bullying Alliance provides free anti-bullying CPD online training, which is available on our website.

Recommendation 12: We believe that under paragraph 191, schools should provide evidence of anti-bullying training staff have received.

Recommendation 13: Paragraph 70 should not just reference bullying of school staff., it should also reference bullying of pupils.

As discussed above in the section about the research, bullying is more likely to happen at times of transition and that online bullying is a significant factor in school. Research shows, the vast majority of online bullying amongst children and young people starts face to face, often at school.[23] The government's own research also shows that how children feel at school and their feelings of safety at school have a significant impact on the likelihood of them experiencing online bullying[24].

Recommendation 14: Include a requirement of schools to gather evidence about bullying on the way to and from school, and online.

The content within the grade descriptors relating to bullying has reduced significantly compared with the current school handbook. There is also little difference between an Outstanding and Good grade when considering bullying.

Recommendation 15: We believe it is important to see the following included in the Good and Outstanding grade descriptors:

- Schools tackle all forms of bullying, including prejudice based bullying and online bullying

- Schools have a clear strategy to tackle bullying that is understood by the whole school community and is underpinned by a good quality anti-bullying policy

- Pupils are involved in developing the school anti-bullying messages

- On the rare occasions that bullying happens, pupils know how to report it, feel confident it will be taken seriously and schools act quickly to address it. It is also vital that schools reflect and learn from incidents of bullying in their school.

- Schools record and monitor incidents of bullying so that patterns of behaviour can be discerned and repeated incidents are not treated as isolated events.

Recommendation 16: In light of the intention to focus on learners' wellbeing as well as attainment, we believe that paragraph 211 should include professional development, not only with regard to teaching content and delivery, but also for support for wellbeing of pupils and behaviour management.

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[23] Cyberbullying: a storm in a teacup? Wolke, D., Lee, K. & Guy, A. Eur Child Adolesc Psychiatry (2017) 26: 899.
[24] Cyberbullying: An analysis of data from the Health Behaviour in School-aged Children (HBSC) survey for England – Public Health England (2014)

Recommendation 17: Under paragraph 267 looking at evaluating sixth form provision, we would like to see an additional bullet point saying that inspectors will take account of evidence of learner's wellbeing and levels of bullying they may experience.

We recommend a statement such as 'All sixth-form pupils feel safe, and the school takes appropriate action to prevent and respond to bullying and discrimination.'

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