# Student Bullying Prevention and Response Procedures

Penola Catholic College

Melbourne Archdiocese Catholic Schools

## 1. Introduction

Penola Catholic College is a school which operates with the consent of the Catholic Archbishop of Melbourne and is owned, operated and governed by Melbourne Archdiocese Catholic Schools Ltd (MACS).

In alignment with the *National Framework for Addressing Bullying in Australian Schools* and the MACS *Vision for Engagement*, these procedures support a whole-school approach that prioritises prevention, early intervention, timely response and the safety and wellbeing of all students.

The principal holds overall responsibility for leading, monitoring and responding to these procedures and ensuring they are applied consistently across the school. While specific tasks may be delegated, the principal retains accountability for compliance with and delivery of all requirements.

## 2. General requirements

Penola Catholic College is committed to creating safe, inclusive and respectful learning environments where all students can thrive academically, socially and emotionally, and where bullying and other harmful behaviours are not accepted.

The principal will:

- ensure a whole-school approach to preventing and addressing bullying and other harmful behaviours that involves the whole school community – students, parents and carers, the school workforce and the wider school community
- uphold students' rights to safe and supportive learning environments, taking appropriate and timely actions when concerns arise
- meet the Child Safe Standards with particular attention to the needs of students who may experience additional vulnerability, including:
  - Aboriginal and/or Torres Strait Islander students
  - students with disability
  - students from culturally and linguistically diverse backgrounds
  - students unable to live at home
  - lesbian, gay, bisexual, transgender and intersex students
- initiate tailored supports for these students, including:
  - seeking support from the Student Engagement Unit and the Senior Manager School Leadership (SMSL)
  - consulting the school's Designated Teacher or the student's LOOKOUT Education Support Centre Case Manager for students in Out of Home Care (OoHC), and reporting bullying and other harmful behaviour involving these students to the relevant LOOKOUT Centre
  - ensuring reasonable adjustments are in place to support participation, engagement and self-regulation, particularly where behaviours relate to disability
- ensure culturally safe, inclusive and responsive practices for all students
- seek advice from Victoria Police or other authorities where a criminal offence is suspected
- ensure all bullying and other harmful behaviour is reported, recorded and managed in accordance with these procedures.

# 3. Procedural fairness

The principal will ensure that these procedures are applied fairly, consistently and without discrimination by providing students, parents and carers:

- information that is clear, accessible, age-appropriate and available in multiple languages or formats when required
- meaningful opportunities to be heard at all stages of the processes outlined in these procedures
- assurance that all information they provide is genuinely considered when decisions are made throughout the processes outlined in these procedures.

# 4. Duty of care

The principal and all staff, including casual relief teachers (CRT) and volunteers, have a non-delegable duty of care to students to take reasonable care to avoid acts or omissions that could reasonably be foreseen that would likely result in harm or injury to the student, and to work for the wellbeing of each student.

# 5. Prevention

The principal will document and implement a structured, whole-school approach that prioritises primary prevention to stop bullying and other harmful behaviours from occurring and escalating. This includes fostering safe, inclusive and respectful environments, addressing risk and protective factors, and taking proactive and developmentally appropriate action to prevent bullying and other harmful behaviours from occurring or escalating.

## 5.1 Whole-school culture

The principal will foster a school environment that promotes respectful relationships, values diversity and supports student wellbeing, in partnership with students, parents and carers, and the wider school community, by:

5.1.1 Providing staff with professional learning that builds their capacity in primary prevention, early intervention and trauma-informed practice to consistently implement the school's prevention strategies for bullying and other harmful behaviours.

5.1.2 Modelling respectful, inclusive and positive behaviour in all interactions, and fostering safe, supportive and inclusive relationships that reflect the diverse needs of students.

5.1.3 Actively promoting and reinforcing shared expectations that bullying and other harmful behaviours are not accepted and taking reasonable and proportionate steps to prevent and address these behaviours early. Staff are expected to be vigilant, respond early and reinforce a culture in which bullying and other harmful behaviours are not accepted.

5.1.4 Ensuring school practices recognise and respond to the diverse and higher-risk needs of students as identified in the Child Safe Standards and promote an inclusive school culture through curriculum and programs that celebrate diversity, foster mutual respect, build social cohesion and support understanding of difference.

5.1.5 Complying with policies related to child safety, student behaviour, digital technologies and wellbeing to guide and strengthen the school's culture.

5.1.6 Building trust and respect by actively partnering with parents and carers, and the broader school community to share responsibility for a positive and inclusive school culture, and by providing accessible opportunities for them to understand and contribute to the school's prevention approaches.

5.1.7 Encouraging participation in national initiatives such as the *Bullying No Way Week*, and using resources from *Bullying No Way*, *Bullying Stoppers* and the *eSafety Commissioner* to reinforce whole-school prevention messages.

## 5.2 Leadership and policy oversight

The principal will actively promote respectful relationships and positive student behaviour through leadership, visibility and continuous improvement. This includes:

5.2.1 Regularly reviewing and evaluating these procedures and the *ICT Acceptable Usage Policy – Students* to ensure they are effective, accessible and responsive to change and emerging issues, including by:

- reviewing school systems to comply with legislative and regulatory requirements
- supporting continuous improvement through data collection, evaluation and research
- publishing policies and procedures on the school website and ensuring they are accessible, visible and clearly outline how concerns can be raised
- providing staff with ongoing professional learning on prevention of bullying and other harmful behaviours, cyber safety and student wellbeing.

5.2.2 Implementing proactive, whole-school strategies to ensure all staff understand and fulfil their responsibilities to assess the school environment, including physical and online spaces, for risks related to bullying and other harmful behaviours, and implement proactive strategies to reduce identified risks.

5.2.3 Using data and evidence-based programs and practices as part of a continuum of prevention and early intervention, such as: *Resilience, Rights and Respectful Relationships (RRRR)*, *Positive Behaviour for Learning (PBL)*, *Victorian Curriculum F–10 Version 2.0* connections to the relevant topics within the Personal and Social Capability, Ethical Capability and Intercultural Capability.

- Respectful Relationships (RRRR)
- The Resilience Project

## 5.3 Behaviour support and classroom practice

The principal will support staff to consistently implement evidence-based prevention and early intervention practices within classrooms as part the school's structured, whole-school approach to promoting positive student behaviour and effective classroom practice by:

5.3.1 Providing staff with evidence-based classroom behaviour support strategies that promote positive behaviour, discourage bullying and other harmful behaviours, and enable safe, inclusive and predictable learning environments as outlined in the school's *Student Behaviour Support Procedures*.

5.3.2 Embedding respectful, inclusive and developmentally appropriate teaching practices through participation in Respectful Relationships education and explicit instruction, aligned to the Victorian Curriculum F–10. This includes teaching the knowledge, skills and dispositions that prevent and respond to bullying and other harmful behaviours, supporting students' social and emotional development and ensuring teaching is culturally responsive and accessible to all learners.

5.3.3 Promoting safe and responsible digital behaviour by actively monitoring students' Information and Communications Technology (ICT) use, modelling positive online conduct and reinforcing safe digital practices in line with the *ICT Acceptable Usage Policy – Students*.

## 5.4 Student empowerment and leadership

The principal will support staff to foster student empowerment and leadership as part of the school's whole-school approach to preventing bullying and other harmful behaviours by:

5.4.1 Promoting safe and constructive upstander behaviour and equipping staff to recognise and encourage students who take positive action to support their peers.

5.4.2 Providing meaningful opportunities for student voice and leadership, including through structures such as the Student Representative Council, enabling students to contribute to the design, implementation and review of safety, wellbeing and prevention initiatives.

5.4.3 Embedding equity, inclusion and respect for diversity across leadership, governance and everyday practice so that all students experience belonging, can exercise their voice and feel empowered to be safe, consistent with the *Child Safety and Wellbeing Framework*.

5.4.4 Supporting staff to implement peer-support and student leadership programs that strengthen positive peer relationships across year levels and promote inclusion and respect.

5.4.5 Creating structured opportunities for students to co-design and review school processes and prevention strategies, ensuring their perspectives inform continuous improvement.

## 5.5 Student responsibilities

The principal will support staff to ensure students understand the significant role they play in contributing to a safe and inclusive school culture by:

5.5.1 Clearly communicating these procedures, the *Student Behaviour Support Policy,* the *ICT Acceptable Usage Policy – Students* and the *Code of Conduct – Students*, and ensuring students understand behavioural expectations and their responsibilities.

5.5.2 Encouraging help-seeking behaviours and early reporting, ensuring students know how to access support if they witness or experience bullying or other harmful behaviours, and understand safe alternatives to retaliation.

5.5.3 Reinforcing expectations for safe online behaviour, including that conduct on digital platforms connected to the school is part of the school environment and subject to school expectations.

5.5.4 Guiding students, where age-appropriate and safe to do so, to retain appropriate evidence (for example, text messages) of bullying and other harmful behaviours to support reporting processes, except in cases involving explicit content such as nudity or deepfakes.

# 6. Reporting

The principal will implement whole-school reporting processes that are clear, accessible and transparent, enabling early intervention, timely action and shared understanding across the community of how to raise concerns about bullying and other harmful behaviours.

## 6.1 Bullying

The principal will ensure that:

6.1.1 Students, staff, parents and carers can report concerns through confidential channels that are safe, accessible, culturally responsive and developmentally appropriate.

6.1.2 Reporting processes are clearly communicated and publicly available, outlining:

- how to report concerns
- what information to provide
- how reports will be managed and responded to
- available supports
- escalation pathways, if concerns are not resolved.

6.1.3 Students are actively encouraged and supported to report early, including when they witness bullying and other harmful behaviours (upstander reporting), and are provided with safe, age-appropriate methods for doing so.

6.1.4 All reports of bullying and other harmful behaviours are taken seriously, promptly acknowledged and responded to in a timely and appropriate manner, with student safety and wellbeing prioritised.

6.1.5 Fair, consistent and transparent escalation pathways are in place when initial interventions do not resolve concerns or risks remain, including access to additional supports and external advice where required.

6.1.6 Subsequent actions and the reasons for them are communicated to those involved or impacted, to the greatest extent possible while maintaining privacy obligations.

6.1.7 All reports are documented and stored securely in accordance with relevant policies, procedures and legal obligations. Schools may use the *Student Bullying and Other Harmful Behaviour Investigation and Response Record* template to record details about bullying or other harmful behaviours.

6.1.8 Staff report the following bullying or other harmful behaviours via MACS Guard:

- non-routine incidents or those resulting in serious injuries or illnesses (physical and psychological), requiring treatment by a medical professional
- significant or repeated behavioural incidents that place wellbeing or safety at risk
- aggressive behaviour or physical threats involving students, parents or others.

# 7. Response

The principal will implement and oversee a whole-school, structured approach that ensures responses to bullying and other harmful behaviours are timely, consistent and proportionate. Responses will prioritise student safety, focus on early intervention and support, and be evidence-based, trauma-informed, relationship-centred, justifiable and tailored to circumstances.

## 7.1 Immediate response and early intervention

The principal will support staff to respond consistently and effectively to any observed or reported bullying or other harmful behaviour by ensuring that:

7.1.1 Reasonable effort is made to initiate a response within two school days. Initial actions will focus on safety, preventing further harm and beginning communication with those involved. This includes:

- taking necessary steps to maintain immediate safety
- providing initial wellbeing support
- initiating appropriate early response actions
- making reports to Victoria Police or other authorities where required
- contacting parents and carers and outlining next steps.

7.1.2 Staff prioritise the safety and wellbeing of all students involved and respond in a fair, respectful and sensitive manner that considers diverse and intersecting needs.

7.1.3 Early, proportionate and evidence-informed action is taken to address behaviours, support those involved and prevent escalation.

## 7.2 Investigation and documentation

The principal will ensure that all observed or reported bullying and other harmful behaviours are investigated through fair, timely and impartial processes that prioritise student safety and wellbeing.

7.2.1 Investigations will be conducted in a consistent, unbiased and timely manner. The process will avoid assumptions, ensure all students have an opportunity to be heard and consider information from all relevant sources.

7.2.2 Investigations will be guided by the *Student Bullying and Other Harmful Behaviour Response Pathway* and will generally include the following steps:

**Step 1: Awareness and immediate risk assessment**

- A staff member becomes aware of the behaviour and assesses immediate risk.
- If there is risk of immediate harm or danger, staff ensure safety by:
  - separating students involved
  - providing first aid if required
  - enacting the Emergency Management Plan
  - contacting Emergency Services (000), if needed.

**Step 2: Preliminary assessment**

- Relevant staff are informed, such as the class teachers and supervising staff, to provide appropriate oversight and support.
- Determine whether the behaviour constitutes bullying. Refer to resource: *Bullying No Way:* What is bullying?
- If not bullying, manage the behaviour under the *Student Behaviour Support Policy*.

**Step 3: Information gathering**

- Collect information from students, staff and witnesses.
- Schools may use the *Student Bullying and Other Harmful Behaviour Investigation and Response Record – Template for schools*.
- Records must be accurate, securely maintained and reflect the perspectives of those involved.

- Resource: *Bullying No Way:* Investigating school bullying

**Step 4: Response action plan**

- Develop and implement a response action plan. Schools may use the *Student Bullying and Other Harmful Behaviour Response Action Plan – Template for schools* to support this process, ensuring that the plan:
  - prioritises safety and wellbeing, including safety planning with the student(s) experiencing bullying
  - supports student(s) engaging in bullying to understand and change their behaviour
  - outlines agreed actions, supports and follow-up
  - includes appropriate communication with parents and carers.
- Monitor the situation closely.

**Step 5: Monitor, review and escalate (where required)**

- Maintain communication with students and parents and carers, and adjust supports as required.
- Where the behaviour persists or risks increase, implement additional supports, seek specialist advice (for example, consultation request to Student Engagement Services) and apply escalation pathways.
- Where bullying or other harmful behaviour may constitute a criminal offence (for example, physical violence or cyberbullying), schools must seek advice from Victoria Police or other relevant authorities.
- Resource: *Department of Education:* Bully Stoppers.

7.2.3 Responses will be justifiable, proportionate and tailored to the circumstances, and may include:

- restorative practices
- educational responses to build understanding and change behaviour
- disciplinary actions aligned with the *Student Behaviour Support Policy* suite.

7.2.4 Responses will support students to understand the impact of their behaviour and contribute to ending cycles of harm.

7.2.5 Parents and carers will be promptly notified of bullying or other harmful behaviour involving their child, first verbally and then in writing, and will be engaged in the resolution process where appropriate.

## 7.3 Support and wellbeing

The principal will ensure appropriate support is provided to all students and staff involved in or affected by bullying or other harmful behaviours, including:

- targeted support for students experiencing bullying to restore safety, wellbeing and engagement in learning
- support for students engaging in bullying to understand the impact of their actions and develop the skills needed to change behaviour
- guidance and support for bystanders to encourage safe and constructive upstander behaviour
- access to appropriate wellbeing supports and services for students and staff.

## 7.4 Monitoring, follow-up and escalation

The principal will ensure that bullying and other harmful behaviour is actively monitored and reviewed to support effective resolution, ongoing safety and prevention of recurrence. This includes:

- monitoring the effectiveness of actions taken and maintaining communication with staff, students, and parents and carers
- setting clear dates for follow-up reviews, adjusting plans as needed
- implementing consistent processes for managing repeated or ongoing bullying or other harmful behaviour

- applying clear and fair escalation pathways, including seeking additional support or external advice where appropriate.

# 8. Communication and partnerships

The principal will ensure that communication with parents, carers and the broader school community is clear, timely, accessible and transparent, supporting shared responsibility for a safe and respectful school culture while maintaining privacy obligations. This includes:

8.1 Reinforcing shared expectations for respectful behaviour and promoting collaborative approaches to preventing and addressing bullying and other harmful behaviours. This includes:

- encouraging parents and carers to model behaviour consistent with the school's vision, mission and values
- working in partnership with parents and carers when responding to bullying or other harmful behaviour, involving them in decision-making where appropriate and in the best interests of the student
- reminding parents and carers of the importance of reinforcing responsible technology use at home, in line with the *ICT Acceptable Usage Policy – Students*, and drawing on resources such as the Department of Education's Safe Socials.

8.2 Communicating actions taken and the reasons for those actions to those involved or impacted, to the greatest extent possible while maintaining confidentiality.

8.3 Encouraging parents and carers to report serious concerns about bullying or cyberbullying to relevant authorities (for example, Victoria Police, internet service providers, the eSafety Commissioner), notify the school and seek appropriate external support.

8.4 Providing opportunities for parents and carers to engage with the school in ways that strengthen communication and partnership (for example, parent information evenings, workshops or other school-identified initiatives), including:

- Family Partnership Meetings
- Parent Information Evenings
- Community Events (eg. Performing Arts, special events, celebrations)

# 9. Documentation

The principal will ensure the school uses clear, consistent and transparent processes to accurately record all observed or reported bullying and other harmful behaviour. This includes:

9.1 Guiding staff to follow the *Student Bullying and Other Harmful Behaviour Response Pathway* to support consistent and timely action, drawing on resources such as the Department of Education's Bully Stoppers where helpful.

9.2 Using the *Student Bullying and Other Harmful Behaviour Response Action Plan – Template for schools* to document actions taken, supports provided and communication with those involved.

9.3 Maintaining comprehensive, accurate and secure records of all bullying and other harmful behaviour, including: actions, supports, communication and investigation details in accordance with legislative, regulatory and system requirements (*Ministerial Order 1359 – Implementing the Child Safe Standards – Managing the risk of child abuse in schools* and the *Child Safety and Wellbeing Recordkeeping Procedures*). Schools may use the *Student Bullying and Other Harmful Behaviour Investigation and Response Record – Template for schools*.

9.4 Facilitating staff participation in annual audits to identify patterns, trends, risk areas and emerging issues, supporting continuous improvement.

# 10. Definitions

Definitions of standard terms used in these procedures can be found in the Glossary of Terms.

**Bullying**

Bullying is an ongoing and deliberate misuse of power in relationships through repeated verbal, physical and/or social behaviour that intends to cause physical, social and/or psychological harm. It can involve an individual or a group misusing their power, or perceived power, over one or more persons who feel unable to stop it from happening. Bullying can happen in person or online, via various digital platforms and devices, and it can be obvious (overt) or hidden (covert). Bullying behaviour is repeated, or has the potential to be repeated, over time (for example, through sharing of digital records).

Bullying of any form or for any reason can have immediate, medium and long-term effects on those involved, including bystanders. Single incidents and conflict or fights between equals, whether in person or online, are not defined as bullying.

There are four main types of bullying behaviour:

- **physical bullying:** examples include hitting, pushing, shoving, intimidating or otherwise physically hurting another person, or damaging or stealing their belongings. It includes threats of violence.
- **verbal/written bullying:** examples include name-calling or insulting someone about an attribute, quality or personal characteristic.
- **social bullying or relational or emotional bullying:** examples include deliberately excluding someone, spreading rumours, sharing information that will have a harmful effect on the other person, and/or damaging a person's social reputation or social acceptance.
- **cyberbullying:** any form of bullying behaviour that occurs online or via a mobile device. It can be verbal or written and can include threats of violence as well as images, videos and/or audio.

Bullying behaviour can include specific forms:

- **racist bullying:** belittling, mocking, intimidating or shaming someone because of their physical appearance, ethnic background, religious or cultural practices, and/or the way they dress or talk.
- **homophobic and transphobic bullying:** bullying on the basis of sexuality or gender expression. It can include physical violence, cyberbullying, name-calling, exclusion, 'jokes' and/or sexual harassment. It is a common experience for young people who are same-sex attracted, gender diverse or for those who may not behave according to gender stereotypes. Many lesbian, gay, bisexual, transgender and gender diverse, intersex, queer, asexual and questioning (LGBTIQA+) students may not feel confident or safe enough to tell anyone about being bullied, especially if they have not disclosed their sexuality or gender identity to friends, family or teachers.

Bullying can be easy to see and detect (overt) or hidden, subtle and hard to detect (covert):

- **overt bullying:** involves physical actions such as punching or kicking, or observable verbal actions such as name-calling and insulting.
- **covert bullying:** can be very difficult for someone outside of the interaction to identify. It can include hand gestures and threatening looks, whispering, excluding or turning your back on a person, or restricting where a person can sit and who they can talk with. Social bullying (spreading rumours, manipulation of relationships, excluding, isolating) is often covert bullying.

Bullying is not:

- mutual conflict that involves a disagreement but not an imbalance of power – however, unresolved mutual conflict can develop into bullying if one of the parties targets the other repeatedly in retaliation
- single-episode acts of nastiness or physical aggression, or aggression directed towards many different people
- social rejection or dislike, unless it involves deliberate and repeated attempts to cause distress, exclude or create dislike by others.

**Information and communications technology (ICT)**

Information and communication technology (ICT) encompasses digital tools, devices, networks, and platforms used for communication, learning and information management.

**Physical abuse**

Non-accidental physical contact or the threat of physical contact to a child that causes or is likely to cause more than minimal or transient adverse physical or emotional consequences for the child.

**Sexual abuse**

Sexual or indecent conduct by an adult toward a child or exposure by an adult of a child to sexual or indecent conduct.

**Upstander**

An upstander is someone who actively chooses to support a person being abused or harmed – whether online or in person, privately or publicly – by taking action to help them.

# Related policies and documents

## Supporting documents

Student Bullying and Other Harmful Behaviour Investigation and Response Record – Template for schools
Student Bullying and Other Harmful Behaviour Response Action Plan – Template for schools
Student Bullying and Other Harmful Behaviour Response Pathway
Student Bullying Prevention and Response Policy

## Related MACS policies and documents

Child Abuse Identification and Response Policy
Child Safety and Wellbeing Policy
Child Safety and Wellbeing Recordkeeping Procedures
Code of Conduct for MACS Staff
Complaints Handling Policy for MACS Schools
Enrolment Policy for MACS Schools
ICT Acceptable Usage Policy – Students
Parent/Guardian/Carer Code of Conduct
Pastoral Care Policy for MACS Schools
Reportable Conduct Policy
Student Behaviour Support Policy for MACS Schools
Student Behaviour Support Procedures
Student Code of Conduct
Suspension, Negotiated Transfer and Expulsion of Students Procedures

## Resources (external to MACS)

Australian Student Wellbeing Framework (2018)

Bully Stoppers: a resource containing information and advice for the school community, including students, parents and carers, and school staff.

Bullying. No Way!: a website for Australian schools, managed by the Safe and Supportive School Communities Working Group (SSSC), which has representatives from all states and territories, including the Catholic and independent schooling sectors.

Department of Education and Training (Vic). 2021. Bullying Prevention and Response Policy

Department of Education and Training (Vic). 2021. Cybersafety and Responsible Use of Digital Technologies

Department of Education and Training (Vic). 2020. Mobile Phones – Student Use

eSmart: assists schools to develop a culture that promotes the safe, smart and responsible use of technology.

eSafety Commissioner: provides a range of up-to-date information and resources, coupled with a complaints system, to assist children who experience serious cyberbullying and image-based abuse.

Privacy Compliance Manual (2020). Catholic Education Commission of Victoria Ltd (CECV) (CEVN website)

Safe Socials | vic.gov.au

Student Wellbeing Hub

Public Record Office Victoria Recordkeeping Standards

# Policy information table

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