

WESTFIELD PRIMARY SCHOOL

Anti-Bullying Policy November 2022

Review date: September 2023

Written by Marie McAteer and Julia Findlay



Anti-bullying Policy

Aims

The aim of our school is to create a safe, secure and happy environment, where all our children can thrive and learn. We expect, encourage and reinforce good behaviour. All members of our school should adhere to the Westfield Primary Way containing our 5 underpinning values of **Positivity, Respect, Independence, Diversity** and **Excellence** that supports our children in becoming rounded people. These lie at the heart of the high expectations we have for behaviour in our school.

All children have an entitlement to feel safe at Westfield Primary School. We believe that the school has a central role in the children's social, moral and well-being development just as it does in their academic development. Just as we measure academic achievement in terms of progress and development over time towards academic goals, so we measure standards of behaviour in terms of the children's ability to develop and grow into positive members of society.

We aim to teach our children and staff how to manage any situations. This policy is updated annually, and shared with staff, parents and children. It is shared on the website, as pupil and parent friendly leaflets and is translated into other languages when needed, in line with our school community.

We have an open-door policy and encourage parents to come in and work with us to support their children to feel safe in our school.



We are a core member of:

Policy Development

This policy was formulated in consultation with the whole school community with input from members of staff, governors, parents/carers, children, and visiting external providers, in particular Specialist Teachers for Inclusive Practice. Pupils contribute to the development of the policy through the Anti-bullying Team, circle time discussions, RSE curriculum and assemblies. We have a set of school rules that underpin class rules and class code of conduct. We have a whole school behaviour policy which promotes positive behaviour.

The school's duties

The school is responsible under the Health and Safety at Work Act 1974 for the health and safety of pupils: They are required to do all that is reasonably practicable to protect their health and safety.

- The school has a common law duty of care to pupils in school. They are required to take reasonable care.
- The statutory and common law duties are discharged if reasonable precautions are taken to prevent bullying in schools and there are procedures in place to record any incidents that do take place and procedures to take appropriate action with the aim to stop further incidents.
- The school provides staff with anti-bullying training, policies and procedures in order to support them to implement anti-bullying with a whole school approach.

Roles and responsibilities

- The key Senior Leadership Team lead for Anti-bullying is: Julia Findlay - **Inclusion Leader** who is responsible for coordinating the recording system, analysing data and using this to inform school improvement.
- The Anti-bullying Coordinators are: Julia Findlay and Marie McAteer.
- The **Headteacher**, Karyn Hing, will oversee prejudice-related incidents; these include incidents related to race, religion or belief, gender, sexual orientation, special educational needs and disability (SEND) and other prejudices. These are managed, and outcomes recorded, using the Prejudice-Related Incidents Monitoring Form (**Appendix 1b**). Such incidents are reported at the end of each summer term to the Data Management Team at Surrey County Council. The school acknowledges that repeated incidents or a single serious incident may lead to consideration under Child Protection procedures. More information about Prejudice/Hate Crime-related incidents can be found at **Appendix 4**.
- The **Headteacher** and **Inclusion Leader** will ensure adequate and relevant Anti-Bullying training is delivered to all school staff.
- The **Learning for Life (PSHE) subject leader**, Hayley Wallis, is responsible for ensuring the PSHE & Citizenship curriculum.
- **Mrs McAteer (Anti-bullying Coordinator)** is responsible for informing the school community of up-to-date information on Anti-bullying and promoting Anti-bullying. Some roles involved are to organise an Anti-Bullying Week; raise awareness of the anti-bullying

and anti-prejudice agenda throughout the school; monitor the school's anti-bullying log; alerting SLT for any specific trends, and act as a source of information and support for staff dealing with friendship and any potential bullying issues; keep up to date with national and local information about bullying and prejudice, inform staff as necessary and helping staff, pupils and parents to understand bullying v friendship issues and how these can be responded to; keep parents regularly informed of information and tips pertinent to anti-bullying and ensure restorative work is carried out in response to incidents of bullying in liaison with the Inclusion Leader.

- The **Computing subject leader**, Kate Beattie, is responsible for ensuring the Online Curriculum, including teaching strategies to prevent cyber-bullying, is delivered in each year group

What is bullying?

ANTI-BULLYING ALLIANCE

Definition of bullying

Bullying is the repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power. It can happen face to face or online.

There are four key elements to this definition:

- hurtful
- repetition
- power imbalance
- intentional

(See **Appendix 3** for fuller definitions of bullying terms)

Bullying can include

- Physical - pushing, poking, kicking, hitting, biting, pinching etc.
- Verbal - name calling, sarcasm, spreading rumours, threats, teasing, belittling.
- Emotional - isolating others, tormenting, hiding books, threatening gestures, ridicule, humiliation, intimidating, excluding, manipulation and coercion.
- Online /cyber - posting on social media, sharing photos, sending nasty text messages, social exclusion.

- Indirect - Can include the exploitation of individuals.

This policy states that *bullying is a form of child on child abuse*. See our Child on Child Abuse including Sexual violence and sexual harassment Policy.

Child on child abuse is any form of physical, sexual, emotional, financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate). It can be a one-off incident or it can be a series of incident involving the same children. It can happen between any number of children, and can affect any age group (Department for Education (DfE), 2018/2021). It can occur online, in-person, directly, indirectly, in school and out of school. It can occur between children of the same age, different age and across different schools. It can be harmful to the children who display it as well as those who experience it.

If you would like to know more about these types of bullying please visit:

<https://antibullyingsoftware.com/what-is-the-definition-of-physical-bullying/>

<http://www.bullying.co.uk/cyberbullying/what-is-cyberbullying/>

<https://www.anti-bullyingalliance.org.uk/tools-information/advice-parents>

How does bullying differ from teasing/falling out between friends or other types of aggressive behaviour

Bullying is

- a deliberate intention to hurt or humiliate.
- a power imbalance that makes it hard for the victim to defend themselves.
- usually persistent. We use the acronym **STOP**; - **Several Times, Often, on Purpose** - see appendix 1a - Anti-bullying booklet by the children for the children

Occasionally an incident may be deemed to be bullying even if the behaviour has not been repeated or persistent possibility should be considered, particularly in cases of sexual, sexist, racist or homophobic bullying and when children with disabilities are involved. If the victim might be in danger then intervention is urgently required.

What Does Bullying Look Like?

Bullying can include:

- name calling

- taunting
- mocking
- making offensive comments
- physical assault
- taking or damaging belongings
- cyber bullying - inappropriate text messaging and emailing; sending offensive or degrading images by phone or via the internet producing
- offensive graffiti
- gossiping and spreading hurtful and untruthful rumours
- excluding people from groups.

Although bullying can occur between individuals or groups, it can often take place in the presence (virtually or physically) of others who become the 'bystanders' or 'accessories'.

Why Are Children and Young People Bullied?

Specific types of bullying include:

- bullying related to race,
- religion or culture bullying related to special educational needs or disabilities bullying related to appearance or health bullying relating to sexual orientation bullying of young carers or looked after children or otherwise related to home circumstances sexist or sexual bullying.

There is no hierarchy of bullying - all forms will be taken equally seriously and dealt with appropriately. young people young people and staff between staff individuals or groups.

Signs of Bullying

Pupils who are being bullied may show changes in behaviour, such as becoming shy and nervous, attention seeking, feigning illness, aggressive, taking unusual absences or clinging to adults.

There may be evidence of changes in work patterns, lacking concentration or truanting from school. There may also be physical evidence such as unexplained bruising or grazes. All school staff must be alert to the signs of bullying and act promptly and firmly against it in accordance with this policy and also the school's Safeguarding and Child Protection policy

Curricular approaches to anti-bullying

In dealing with bullying we aim to:

- Raise awareness about bullying
- Share and refer to the school's anti-bullying policy
- Increase understanding for victims and bullies
- Teach pupils about their relationships with others through the curriculum
- Teaching children to tell
- Teaching children to involve an adult if they see bullying happening
- Raise self-awareness of own well-being in various situations

Our ethos underpins our curriculum and anti-bullying is taught using formal and informal approaches. More formal approaches include our Learning for Life (PSHE) curriculum, RSE and our whole school themed 'Anti-Bullying', 'Internet Safety' and 'Staying Safe' weeks. We teach the Surrey Online Curriculum in all year groups. Less formal approaches include our whole school assemblies, our class Circle Times, anti-bullying posters, Well-Being Week, visits from agencies such as the police and staff modelling respect for all, within lessons, inside the school building and out in the playground.

Reporting Bullying Incidents

Children are advised during Learning for Life (PSHE) lessons, Anti-Bullying Week and regular Circle Times that they should speak to any adult that they trust - class teacher, LSA, parents, Home School Link Workers, for example. Parents should tell their child's class teacher. The school will then complete the Anti-Bullying Log and involve the relevant members of staff to deal with the issue.

Restorative Approaches:

At Westfield, we use Restorative Approaches, following whole staff training based on Belinda Hopkin's Restorative Justice in Schools, to deal with behaviour and bullying. The steps we follow are

1. Everyone has their own perspective with the key question *What happened?*
2. Thoughts and feelings with the key questions *What were you thinking? How were you feeling?*
3. Who has been harmed? With the key question *Who else has been affected by this?*
4. Moving on with the key question *What do you need to do now, so that the harm can be repaired and positive relationships can be restored?*
5. What do you need to make things right?
6. Repair What are our steps to repair this and move on?

Pupils Who Have Been Bullied:

Will be supported by:

Offering an immediate opportunity to discuss the experience with their class teacher or a member of staff of their choice - using of Restorative Approach style questioning. Support may include:

- Reassuring the pupil
- Encouraging their friends to be supportive
- Inclusion Team support and other continuous support available in school, through our own wellbeing offer of interventions
- Circle time discussion
- Time out
- Restorative Approach

- Activities to restore self-esteem, confidence and to build resilience
- Peer Mentors and Anti-bullying Ambassadors

Pupils Who Have Bullied:

Will be supported by:

- Being listened to without interruption
- Being asked open questions to encourage them to explain what had happened.
- Discovering which children were involved and why
- Establishing the facts and the need for change.
- Creating an opportunity to make amends.
- Informing parents/carers to engage their support
- Support of the inclusion team
- Involvement of the SLT
- Referral to outside agencies if appropriate - CAMHS or Behavioural Support.

The role of all staff members

Be aware and vigilant to the signs that a child may be being bullied.

If a child tells a staff member that they are being bullied, the staff member must

- Find out the facts from the child
- Listening to them without interruption
- Reassure the child that they have done the right thing to tell an adult
- Write down the child's words at the time or as soon as they can
- Reassure the child that they will be supported
- Make sure the child is feeling safe (for instance, playing or working in a different area from the accused child); gain the voice of the child on how they would feel safe
- Inform the class teacher
- Work with members of the SLT and Anti-bullying coordinator as required.
- Complete the Anti-Bullying Incident Log and, if appropriate, the Prejudice/Hate Crime-Related Incident Log.

The role of the class teacher

- will gain a full understanding of the incident
- will follow the school's current Behaviour Policy, with the support of the Anti-bullying coordinator or SLT
- will discuss the incident(s) with the parents/carers
- will contact the parents to arrange a meeting
- log the details of the incident on the bullying log on the staff drive and pass to the Anti-Bullying Coordinators, year leader or a member of the senior leadership team as appropriate.

- If the incident requires following up, the Anti-Bullying Coordinator will speak to the parties involved in line with our anti-bullying and restorative procedures. If parents are not satisfied with how the incident has managed they will be invited to arrange a meeting with a member of SLT.

What should parent/carers do if their child tells them that they are being bullied?

- Talk to the child calmly to reassure the child that telling an adult is the right thing to do
- Make a note of what the child says
- Explain that the child should report any further incidents to a teacher or other member of staff straight away
- Make an appointment to see the child's teacher.

Visitors

If a child tells a visitor, or suggests this in their behaviour or in an incident, the visitor must speak to the class teacher or the member of staff to whom they are directly linked.

How do we respond to Bullying?

Bullying incident identified or alleged

If it is identified as a friendship issue (not bullying) - support in school such as working with the Inclusion Team, Restorative Approaches or Circle of Friends may be instigated, discussion with children about how we look after each other, possible use of Circle Time and PSHE lessons to reinforce expected behaviour with whole class



Staff member investigates incident and, if the incident is bullying following a full investigation (lots of times, on purpose). Staff member allocated to investigate discusses the issue with all the children involved, encouraging the child who has been accused of bullying to understand the consequences for the child who has been bullied, using a restorative approach to educate and support both victims and perpetrators. Parents involved to discuss strategies (all parties).



Staff member completes the Anti-Bullying Incident Log on the system (located at Staff/Staff/Behaviour & Anti-Bullying/Anti-Bullying/Anti-Bullying Incident Log; Appendix 2b) and, if appropriate, the Prejudice/Hate Crime-Related Incident Log on the system (located at Staff/Staff/Behaviour & Anti-Bullying/Prejudice Related Incidents/Prejudice Related Incident Log) (Appendix 1b), explaining allegations - what has been happening, when, where and by whom. pass to Inclusion Leader for monitoring, detailing the support given to all parties.



If it is a prejudice/Hate Crime related incident complete the Prejudice-Related Incidents Monitoring form set out in Appendix 1b (and available on the system at Staff/Staff/Behaviour & Anti-Bullying/Prejudice Related Incidents//Prejudice form) and pass to the Headteacher, detailing the support given to all parties.



We aim to support both the victim and the perpetrators of a bullying incident, through the use of Restorative Approaches, Circle of Friends, Social Skills Support Group, individual mentoring, WBA, support from MMS at lunchtimes, involvement of outside agencies, such as STIPs, Educational Psychologist, police (if necessary).



Where sanctions are needed we use our Behaviour Policy, therefore sanctions may include removal from group; withdrawal of break or lunchtime privileges; banning the pupil from school trip or sports event (if these are not an essential part of the curriculum); internal exclusion, suspension.



Update the Anti Bullying Incident Log or in the case of a prejudice related incident, the Prejudice Related Incident Log (see above for the location of both logs) and notify Inclusion Leader or Headteacher as appropriate.



Monitor the situation

If resolved, close the incident; continue ongoing support if necessary; if further incidents are reported begin the process again. If bullying is persistent then actions detailed in the Behaviour Policy will be implemented.

Parents will be kept informed throughout the process outlined above.

Bullying that does not happen on school premises, but still impacts on the children whilst on school premises, will be dealt with as above. The school will advise that parents contact the police if it deems it necessary to do so.

Strategies to prevent bullying

As part of our on-going commitment to the safety and welfare of our pupils we at Westfield Primary School have developed the following strategies to promote positive behaviour and discourage bullying behaviour:

- We use **Restorative Approaches** to deal with incidents that arise - whole school training (annually)
- RSE curriculum
- We celebrate Anti-Bullying Week to raise awareness every November
- A positive classroom environment
- Circle Time and use of Learning for Life (PSHE) & Coram Life Education materials
- Mediation by adults
- Development of a 'Telling 'culture
- Behaviour Report
- Well-being clubs
- Anti-bullying posters around the school
- Playground Buddying
- Parent information
- Annual staff training and development for all staff

Assertiveness training groups

From time to time we will provide Assertiveness Training for Groups or to support an individual child. This can cover:

- Making assertive statements
- Resisting manipulation and threats
- Dealing with name calling
- Staying calm in difficult situations
- Escaping safely from physical restraint
- Getting help from bystanders
- Boosting self esteem

If parents are not satisfied with the way an issue has been dealt with they may choose to follow the school's complaints procedures.

This policy should be read in conjunction with the following policies:

- Complaints Policy
- Behaviour Policy
- SDP
- Equality, Diversity & Inclusion Policy
- Learning for Life (PSHE) policy
- SEND Policy
- Child Protection & Safeguarding Policy
- Acceptable Use (ICT) Policy
- Acceptable Use (Computing) Policy

- Social Media Policy
- Travelling To and From School Policy
- Educational Visits Policy
- Touch and Physical Intervention Policy
- Child on Child Abuse including Sexual violence and sexual harassment policy

Annual review: September 2023

Appendices to Anti-Bullying policy
Review date: Annually in July

- Appendix 1a** Anti-bullying booklet for the children by the children
- Appendix 1b** Format of Prejudice/Hate Crime Related Incident Log
- Appendix 2a** Bullying Monitoring Log
- Appendix 2b** Format of Bullying Incident Log
- Appendix 3** Definition of bullying
- Appendix 4** Definition of prejudice
- Appendix 5** ABCC Behaviour Log

Appendix 1a

Anti-bullying booklet for the children by the children

<p>Westfield Primary School</p> <p>Anti-Bullying Advice Booklet For All Children</p> <p>2021/2022</p>  <p>We say STOP!</p> <p>Several Times On Purpose</p> 	<p>Bullying Advice Written by Children for Children.</p>  <p>Our school council worked with their classes to gather ideas about stopping bullying and the importance of friendship. We brought our class ideas back to the meeting and wrote them down. The junior school council members then worked tirelessly to create this booklet. The school council also chose to run a competition for drawings about bullying.</p>	<p>Contents</p> <table border="0"> <tr> <td>What is bullying?</td> <td>Page 4</td> </tr> <tr> <td>The importance of being aware of bullying</td> <td>Page 5</td> </tr> <tr> <td>Our School Policy</td> <td>Page 5</td> </tr> <tr> <td>How to be a good friend and how to look after your friends</td> <td>Page 7</td> </tr> <tr> <td>Advice</td> <td>Page 8</td> </tr> <tr> <td>Advice for bullies</td> <td>Page 9</td> </tr> <tr> <td>Advice for witnesses</td> <td>Page 10</td> </tr> <tr> <td>How to stop bullying</td> <td>Page 11</td> </tr> <tr> <td>Cyber bullying</td> <td>Page 12</td> </tr> </table>	What is bullying?	Page 4	The importance of being aware of bullying	Page 5	Our School Policy	Page 5	How to be a good friend and how to look after your friends	Page 7	Advice	Page 8	Advice for bullies	Page 9	Advice for witnesses	Page 10	How to stop bullying	Page 11	Cyber bullying	Page 12
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<p>What is Bullying?</p> <ul style="list-style-type: none"> Bullying happens when they do it on a regular basis. Being mean all the time Physically hurting you Calling you names repeatedly Taking your belongings repeatedly Starting rumours about you Leaving you out of games repeatedly 	<p>The importance of showing kindness</p> <p>It is important to be aware of what bullying is and what you can do to stop it. It could happen to anyone.</p> <p>Our school policy</p> <p>Aims</p> <ul style="list-style-type: none"> Creating a welcoming, caring environment where relationships are based on respect for others Promoting, amongst pupils, self-discipline and appropriate regard for children and adults Encouraging good behaviour Preventing all forms of bullying amongst our pupils Developing respect for school and personal property  <p>Rosi said, "Bullying is not okay. No one deserves to be bullied. You never know what someone else is going through so always show kindness".</p>	<ul style="list-style-type: none"> Ensuring that the standards of behaviour of pupils is acceptable Ensuring that pupils complete any tasks reasonably out for them in connection with their education. Developing good relationships throughout the school, both between adults and pupils and between pupils and their peers. <p>What will happen?</p> <ul style="list-style-type: none"> The school staff will listen to all children and help to put a stop to any incidents of bullying in our school. There will be consequences for all children involved in bullying acts. Parents will be advised Remember, always treat others the way you want to be treated! <p>Bullying really isn't cool</p> 
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STAND UP! SPEAK OUT!

How to be a good friend. How to look after your friends.

- Do treat people with respect.
- Do be nice and polite.
- Do play nicely.
- Do share things.
- Do be kind and helpful.
- Do smile at people.
- Do play together.
- Do let them join in with your game.
- Do be sensible with them.
- Do share work.



ADVICE

- Stand up for people who are being bullied. Bullies often want an audience and approval.
- Take an anti-bullying pledge.
- Take action.
- Talk to other kids.
- Talk to your teachers or Head Teacher.
- Talk to your parents or guardians.
- Speak (and write) up!
- Get creative.



Winger in Woodpeckers said that the workshops during Anti-bullying Week helped raise awareness.

"The workshops helped us see why bullying happens in the first place. Usually bullies are sad and they take their anger out on other people. This is not okay."

ADVICE FOR BULLIES

- Do stay calm.
- Try not to use mean or unkind words.
- Understand the consequence of your choice.
- Bullying makes you look weak.
- Do not take your feelings out on somebody else.
- Talk to an adult if something is bothering you, they can help you before you make a bad choice



Harry advised that children should always tell a trusted adult. He said you should never have to put up with someone being unkind. Kindness always wins!

ADVICE FOR WITNESSES

- Do tell an adult that you know.
- Do comfort the victim.
- Do shout STOP!
- Do tell the bully we don't want bullying.
- Do try and assist and give support to those targeted.
- Do play with the bully so they will learn to be kind.
- Do play with the victim, make them happy.
- Always lend a comforting ear.



How to Stop Bullying

- DO something.
- DO take the person to another group of friends - your group of friends.
- DO tell the teachers and adults.
- DO tell the bully to stop.
- DO ignore the bully. Keep away from the bully.
- DO support them by being kind.
- DO ask the teachers and other adults to stop the bully.
- DO walk away.
- DO stay in a group because bullies pick on people with no friends.

Cyber Bullying

Cyber bullying is when someone bullies you through the computer.

To get help and keep yourself safe...

- Don't meet anybody you don't know in real life.
- Don't respond to messages from anyone you don't know.
- Don't believe everything you read.
- Tell an adult you trust - parent, teacher or known adult.
- Show an adult then delete the mean messages.
- Tell them to stop.
- Ignore them.
- Report everything to someone you trust.
- Shut down the computer after you've informed an adult.



Appendix 1b

Prejudice/Hate Crime Related Incident List of Children

Date	Time of incident	Staff member reporting incident	Type of Prejudice	Incident	Perpetrator	Victim	Action Taken

Appendix 2a

Westfield Primary School

CONFIDENTIAL

Bullying Monitoring Log – to be returned to Inclusion Leader

Name of victim Date

Reg. group

Name(s) of perpetrators (if known)

Brief details of incident

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Name of member of staff who dealt with incident

Brief details of action taken

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Parents informed?		
Victim:	Yes	No
perpetrator	Yes	No

Reported to external agency?		
Local Authority	Yes	No
Policy	Yes	No

Appendix 2b

format of Anti-Bullying Incident Log

Westfield Primary School Anti-Bullying Incident Log

People Involved	Date	Dealt with by	Complaint	Actions Taken/Follow Up

Appendix 3

Bullying is the repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power. It can happen face to face or online.

ANTI-BULLYING ALLIANCE

Definition of bullying



Forms of Bullying

- Physical Bullying: aggression/violence to another, such as hitting, kicking, pushing, spitting, where there is contact
- Verbal Bullying: name calling, teasing, using derogatory terms, undermining their achievements, etc.
- Relational Bullying: undermining a child's relationship with others, through use of derogatory terms, spreading rumours, ruining friendships, alienation etc.
- Cyber-bullying: using the internet/electronic messaging systems to abuse others - either through sending abusive or threatening messages, or spreading rumours and posting offensive images/comments
- SEND Related Bullying: targeting a pupil because of their special educational needs and/or disabilities
- Sexist/Transgender/Homophobic Bullying: using language which undermines a sexual preference, such as calling a child 'gay' or using the term to describe an activity/item negatively; ostracising them from activities due to their gender, sexual preference or family situation
- Prejudice: targeting a pupil because of their race, religion, ethnic background, culture; using racist language

Appendix 4



Taken from

Hate crime and bullying

Understanding how bullying relates to hate crime and hate incidents, and what the law has to say about it.

There is no legal definition of a hate crime. However, the police and the CPS have an agreed definition as follows:

A hate crime is any criminal offence which is perceived by the victim or any other person, to be motivated by hostility or prejudice based on a person's race or perceived race; religion or perceived religion; sexual orientation or perceived sexual orientation; disability or perceived disability and any crime motivated by hostility or prejudice against a person who is transgender or perceived to be transgender.

There is a distinction between a hate crime and a hate incident, which is defined like this:

A hate incident is any incident which the victim, or anyone else, thinks is based on someone's prejudice towards them because of their race, religion, sexual orientation, disability or because they are transgender.

CPS GUIDANCE

However, a hate incident does not necessarily break the law. Where a hate incident amounts to a criminal offence and is based on one of the five protected characteristics, it is known as a hate crime.

The type of conduct which will be considered as a hate incident is wide-ranging and includes the following:

- verbal abuse;
- harassment;
- bullying or intimidation;

- physical attacks;
- threats of violence;
- hoax calls, abusive phone or text messages, hate mail;
- online abuse;
- displaying or circulating discriminatory literature or posters;
- graffiti;
- arson;
- throwing rubbish in a garden; and
- malicious complaints.

