



St. Mary's Limavady

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Addressing Bullying Type Behaviour Policy

Date Approved by Board of Governors	September 2025
Next Policy Review Date	September 2028
Chairperson BOG	
Principal	

Statutory Context & Guidance

It is a duty placed on Boards of Governors in Northern Ireland, to ensure the school has an effective Addressing Bullying Policy and practices aligned to the Addressing Bullying in Schools (NI) Act 2016 which commenced in schools September 2021. This Addressing Bullying Policy takes account of key legislation and is informed by DE Guidance, EA/CCMS/NICIE/CSSC/IME publications and the international context (Appendix 1).

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Section 1: Statutory Context & Guidance

Introduction

At St Mary's we acknowledge that bullying type behaviour exists in schools and wider society and can impact on the lives, mental health, and well-being of those involved. This policy aims to help create, maintain, and embed a culture where everyone agrees that bullying type behaviour is unacceptable.

In St Mary's we believe that safeguarding our pupils is paramount and the responsibility of all stakeholders. We promote a safe, inclusive, and relational school environment where concerns of bullying type behaviour may be shared and addressed, and where pupils are supported.

The purpose of this policy is to:

- define bullying type behaviour
- summarise rights, roles and responsibilities
- explain preventative measures
- clarify processes used for reporting, recording, and responding
- outline monitoring and review processes

The policy is applied where concerns of alleged bullying type behaviour between pupils have been reported. For other concerns regarding bullying type behaviours please refer to the school complaints procedures or associated policies which are aligned DE Circular 2016/08 Public services ombudsman (NI) Act).

The Addressing Bullying Type Behaviour Policy applies:

- while students are on school premises during the school day
- while the pupil is in the lawful control or charge of a member of the staff of the school e.g. during extra-curricular activities, school excursions, residential trips, boarding facilities etc
- Education provision arranged on behalf of the school and provided away from the school premises e.g. In the Area Learning Community.

Ethos and Values

St Mary's ethos permeates all aspects of school life. We recognise the unique nature of every pupil and celebrate the diversity of all the young people within our community. We have a responsibility for the safeguarding and child protection of the children in our care and we will carry out this duty by providing a caring, supportive and safe environment, where each child is nurtured and valued for his or her unique talents and abilities, and in which all our young people can learn and develop to their full potential.

Therefore:

- We acknowledge the fundamental dignity of each person and aim to promote respect for self, for others, the school, the wider community, and the environment.
- We aim to create a safe, stable, and harmonious atmosphere within which the values of truth, trust, freedom, and responsibility are honoured.
- Within the context of a purposeful learning community, and recognising the unique nature of everyone, we aim to offer a curriculum which enables every student to reach their full potential; academically, socially, and aesthetically.
- We endeavour to equip all pupils with the self-confidence and skills which will enable them to make informed and responsible choices in life and appreciate the value of the contribution they can make to society.

- We encourage parental support in promoting the ethos and aims of the school and in building up the life of the school community.
- We are committed to a society where children and young people can live free and safe from bullying type behaviour.
- We believe that every child and young person should be celebrated in their diversity.
- We are committed to a preventative, relational and restorative ethos.
- We value, respect and consider the views and contributions of children, young people and the wider school community.

Links to Other Policies

This policy should be read in conjunction with SEND, Safeguarding, Inclusion, and the wider suite of Pastoral Care policies available on the school website or from the school office by request. These policies include but are not limited to:

Safeguarding and Child Protection Policy	Staff Code of Conduct/Staff Handbook
Attendance Policy	Behaviour for Learning Policy
Health and Safety Policy	Online Safety Policy
Special Educational Needs Policy	Educational Visits Policy
Relationships and Sexuality Education	Pastoral Care Policy
Equality and Inclusion	Visitor Policy

Consultation

We value and respect the views and contributions of our school community. Therefore, as part of this policy development and review, and in compliance with Article 19 of the 2003 Education (NI) Order and the 2016 Addressing Bullying in Schools Act (N.I.), we have consulted with pupils, parents/carers, and staff.

- Pupil consultation involved: Survey/questionnaire voice, focus groups, sharing of EA ABSIT pupil guide, School Council - feedback.
- Parents & carers consultation involved: Survey/questionnaire and sharing of EA ABSIT parent guide - feedback.
- Staff consultation involved: sharing of draft policy to review.

Section 2: What is Bullying Type Behaviour?

'The Addressing Bullying in Schools Act (N.I.) 2016' provides schools with a legal definition which **must** be used by all schools to assess reported concerns of bullying type behaviour.

Addressing Bullying in Schools Definition of "bullying"
(1) In this Act "bullying" includes (but is not limited to) the repeated use of— (a) any verbal, written or electronic communication, (b) any other act, or (c) any combination of those, by a pupil or a group of pupils against another pupil or group of pupils, with the intention of causing physical or emotional harm to that pupil or group of pupils. (2) For the purposes of subsection (1), "act" includes omission.

TRIP

While the legal definition, as set out in the Act, is the primary definition, we also use the mnemonic **TRIP**. This helps to build a shared understanding across our school community of the difference between socially unacceptable and bullying type behaviour.

Socially unacceptable behaviour becomes bullying type behaviour when, after clarifying facts and perceptions, **TRIP** is confirmed:

T	When the behaviour is TARGETED at a specific pupil or group of pupils.
R	When the behaviour is REPEATED over time.
I	When the behaviour is deliberately INTENDED to cause harm.
P	When the behaviour causes PSYCHOLOGICAL/EMOTIONAL and/or PHYSICAL harm.

Note 2: Consideration of an imbalance of power

The Department of Education Addressing Bullying in Schools Statutory Guidance (2021) states that schools should consider the following:

- "Whilst the term "imbalance of power" is not contained within the statutory definition in Northern Ireland, it is a long-standing element of bullying behaviour and internationally recognised by leading academics. Schools may wish to consider including imbalance of power within their own definitions of bullying."
- While an 'imbalance of power' has not been included in the legal definition, the Board of Governors have agreed to incorporate this criterion to help determine if bullying type behaviour was targeted. An 'imbalance of power' is present when someone seen with lesser power, is identified as an object of negative attention. It will be used to validate and confirm the final TRIP decision.

Note 3: One-Off incidents:

- The Department of Education Addressing Bullying in Schools Statutory Guidance (2021) states that schools should consider the following:
- "Schools have the discretion to include one-off acts of bullying behaviour provided their policy stipulates that one-off incidents, in certain circumstances, will be treated as such. The Anti-Bullying Policy should NOT specify incidents that will be considered bullying; instead, the policy should set out the criteria that will be used by school staff to assess whether the incidents will be addressed through the Addressing Bullying Policy or Positive Behaviour Policy."

Although incidents usually involve repetition, a one-off incident may be classified as bullying type behaviour through consideration of the following criteria:

- severity and significance of the incident (See appendix 4)
- evidence of pre-meditation
- psychological/physical impact of the incident on the individuals and/or wider school community
- previous relationship(s) between those involved.
- any previous incident(s) involving the individuals.

A one-off electronic communication can constitute bullying type behaviour through repeated viewing and unwanted sharing of a post.

The 2016 Act requires school to consider whether a pupil(s) **intended** to cause harm when determining if the incident(s) meets the legal definition. In this school, we will consider the following when assessing **TRIP**.

The pupil(s):

- capacity to regulate and understand the impact of their behaviour
- developmental age
- additional, educational, special, physical, or medical needs
- behaviours displayed/presenting profile (diagnosed or undiagnosed e.g. Social Behaviour Emotional Wellbeing, Autism, Attention Deficit Hyperactivity Disorder, Moderate Learning Difficulties etc.)
- individual circumstances e.g. trauma profile, safeguarding concerns, family circumstances and resilience

Omission will be considered when addressing bullying type concerns. This is where a pupil(s) is or are wilfully excluded from a game, activity or group work etc causing potential **psychological harm**. Pupils do not have to be friends in this school, but friendly.

Language

We recognise that all behaviour is communication and should be addressed through a learner centred lens for those who display *and* experience socially unacceptable or bullying type behaviour. We will address all behaviour in a relational, solution focused manner aligned to Safeguarding and SEND.

When discussing allegations of bullying type behaviour, we use language that is aligned to the Addressing Bullying in Schools Act (NI) 2016, and other relevant legislation and guidance (see *appendix 1*). We refer to the behaviour not the pupil and use the following:

- **pupil displaying bullying type behaviour** rather than the 'bully'.
- **pupil experiencing bullying type behaviour** rather than the 'victim'.
- **socially unacceptable behaviour** rather than 'bad behaviour' or 'serious/gross misconduct etc'

Any incident(s) which do not meet the legal definition and TRIP criteria will be addressed under the Behaviour for Learning, Special Educational Needs, Child Protection, Safeguarding, Pastoral and Inclusion and Diversity policies. (Please see the parent and pupil guides in *appendix 6*).

Journey To and From School

The Act outlines a statutory requirement for schools to implement measures to prevent and address bullying type behaviour for pupils whilst travelling to and from school. To this end, in St Marys we:

- Address safeguarding concerns reported in relation to travel to and from school.
- Provide timely support and intervention.
- Assign staff to support a structured, supervised transition at the beginning and end of the school day.
- Agree a scaffolded support plan to address individual needs, regulation and vulnerabilities.
- Reinforce positive and upstanding behaviour expectations through the preventative curriculum.
- Engage with student voice about experiences on the journey to and from school.
- Promote and develop a culture where all pupils respect the rights of others to travel safely.
- Communicate consistently the expectation to include and respect individual rights and diversity.

- Ensure effective communication with transport providers (e.g. Translink, EA Transport, etc.) for early identification and response to reported concerns.
- Provide reporting mechanisms for school and the local community to report concerns confidentially e.g. contacting the school office or contacting the Head of safeguarding.

Electronic Communication

The Addressing Bullying in Schools Act enables school to take steps to help prevent and address online bullying type behaviour involving registered pupils during term time. We acknowledge that negative online behaviour occurring either in or out of school hours, can harm a pupil's education and emotional well-being, and we will support affected individuals. At St Mary's we are committed to supporting our pupils to use the internet safely, responsibly, and respectfully.

The Addressing Bullying Policy is one of several school policies that address electronic behaviour and are reviewed in response to technological developments. As such, follow up is aligned to the wider policy suites – Page 3

In St Mary's, we aim to prevent electronic bullying type behaviour by:

- Addressing key themes of electronic online behaviour and risk through curriculum content.
- Engaging with statutory and voluntary sector agencies and resources (e.g. Safeguarding Board NI, PSNI, Public Health Agency, Safer Schools App) to support the promotion of key messages and online safety.
- Participating in Safer Electronic/Online/Cyber Campaigns to promote key messages.
- Addressing reported safeguarding concerns in relation to the misuse of electronic communication and providing timely support and intervention.
- Providing reporting mechanisms for school and wider community to report any concerns confidentially e.g. safeguarding email address, 'whisper button'.
- Creating, agreeing and implementing an Acceptable Use Agreements see DE Circular 2016/27
- Ensuring all staff regularly have on-line safety training.
- Adhering to our mobile phone policy which prohibits the use of mobile phones by pupils during the school day.

Section 3: Methods and Motivations of Socially Unacceptable or Bullying Type Behaviour

The following are methods of socially unacceptable behaviours which, when **targeted, repeated, intentional** and causing **psychological/physical** harm, may be considered as bullying type behaviour:

Physical Acts	Physical - negative physical contact, material harm such as damaging or taking possessions without permission
Verbal or Written acts	Verbal or written - unpleasant comments, written, verbal, gestures.
Social/Relational	Negatively influencing the actions of others to cause psychological or physical harm
Omission (Exclusion)	Excluding someone/others from e.g. game, activity, group work etc
Electronic Acts	Misuse of online platforms or other electronic communications to cause psychological upset

(Please note the list is not exhaustive)

Our school acknowledges various motivations for bullying type behaviour which we address through our preventative curriculum and responsive approaches. This includes all identity or prejudice motivated bullying type behaviour related to those characteristics protected through Section 75 of the Northern Ireland Act 1998. Motivations include but are not limited to:

• Ability • Age • Appearance • Child Looked After (CLA)/Care experienced • Community background • Cultural • Disability • SEN • Family circumstances (pregnancy, marital status, young carer status)	• Economic Status/FSM • Gender/Gender identity/Perceived Gender • Newcomer/Migrant Status • Peer relationship breakdown • Political affiliation/sectarianism • Race • Religion • Sexual orientation
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Section 4: Rights, Roles and Responsibilities

In St. Mary's, we believe that all members of our school community have the right to be educated in a safe, supportive, learning environment. We acknowledge that all members of our community have a role to play and responsibility to prevent and address bullying type behaviour.

Please see appendix 5 which is a table of identified rights, roles, and responsibilities of staff.

The following staff have been assigned specific responsibility within their role for oversight of the implementation of the Addressing Bullying Policy and associated practices aligned to Safeguarding and SEND legislation. They will support the Principal and Board of Governors with the ongoing review processes.

Section 5: Preventative Measures

The Addressing Bullying in Schools Act (N.I.) 2016, requires schools to focus on preventative measures to help reduce bullying type behaviours. The focus of this section is to set out the approaches taken by our school to help prevent bullying type behaviour effectively.

In St Mary's we scaffold and promote a positive, relational learning environment where all members of the school community feel safe, included and valued. Our preventative measures help avoid bullying type behaviour and contribute to support plans for pupils. They are evident in all domains of school life and include, but are not limited to:

Whole School • SEND, Addressing Bullying, Positive Behaviour, Safeguarding, Pastoral Care, Inclusion & Diversity policies • Visible school ethos e.g. essential agreements, displays, visual cues, celebrations, positive expectations • Positively framed, agreed and communicated Rights, Roles & Responsibilities for all school community members • Peer/Student Leadership Teams • Adults modelling self-regulation, inclusive language and positive relationships	Classroom • Curriculum: PDMU/LLW/RSE (curriculum map could be included in appendices) • Structured form/class-meeting time to promote belonging, connection and positive relationships • Cross-curricular activities • E-safety and digital citizenship • Social Emotional Learning • Circle-time/connect and nurture strategies • Physical/sensory environment regulation checklists • Relevant literature and resourcing exploring related concepts and themes e.g. empathy, inclusion, diversity, problem-solving, relationships, resilience etc.
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• Restorative Practice approaches embedded through staff training and complimentary resources • Steps to Wellbeing (Hi Five Primary resources and Post-Primary Take 5 Steps HSCT) • Trauma Informed and Nurture Principles • Celebration of diversity, equity and inclusion • Parent education e.g. workshops, newsletters, leaflets etc • Shared education projects, events, assemblies, key campaigns e.g. Rights Respecting School kindness day, anti-bullying week • Vertical and horizontal curriculum mapping (curriculum map could be included in appendices) •	• Social thinking/skills training programmes • Friendship Education • Strengths Based Approaches • Collaborative Learning/Problem Solving and Conflict Resolution • Bystander/Upstander Education • Agile groupings and seating arrangements • Online apps and resources
Non-Classroom • Supervision and transition arrangements e.g. including buses • Buddy strategies • Social and extra-curricular opportunities • Professional Development/Training (including for non-teaching and supervision staff) • Structured Play • Play/art and other therapeutic approaches • Designated safe/quiet/reflective/nurture /activity zoned spaces • Enhanced structure during unstructured times e.g. breakfast club, jobs, lunchtime clubs, homework clubs • Structures to facilitate reporting concerns e.g. confidential wellbeing reporting link, designated email, concern boxes etc	Peer Support • Student Leadership e.g. student council, pupil wellbeing teams, prefects, house-captains, ambassadors etc • Pupils trained and supported by staff regarding roles, responsibilities • Peer mentoring programme • Pupil led/directed extra-curricular activities • Buddy Schemes • Bystander/Upstander Training • Peer Mediation/Problem Solving

Professional Development of Staff

In St Marys we recognise the need for effective, updated, and ongoing training for all staff within our preventative measures. As such, we are committed to:

- ensuring that all staff and Governors complete relevant Safeguarding, Child Protection, SEND and Addressing Bullying in Schools training, including those provided by the Education Authority.
- reviewing and amending the content of the Addressing Bullying Policy following training, complex case review or as directed by Department of Education.
- keeping and regularly updating continued professional development records.

Section 6: Statutory Systems and Processes for Reporting, Responding and Recording.

As a school we recognise that reporting a concern of bullying type behaviour can be difficult. For this reason, we have systems in place to enable pupils, parents, and any other person to share concerns discreetly and efficiently with a trusted adult. All concerns of bullying type behaviour will be responded to in line with legislative processes as outlined in this policy.

To this end:

- All our teaching and support staff have completed the EA Addressing Bullying in Schools foundation training as part of this policy review.
- Key leadership staff have completed EA Addressing Bullying in Schools leadership training.
- All our teaching staff have completed additional in school workshops on e.g. systems and processes, prevention and/or effective responses, anti-bias
- All members and/or lead Governors with overall responsibility for the development and review of the Addressing Bullying Policy have completed EA Addressing Bullying in Schools training

Pupils Reporting a Concern:

Pupils may report bullying type concerns in the following ways:

- Verbally sharing with a staff member
- By writing a note to a staff member
- By sending an email to a teacher/using private message on Google classroom etc
- Using a confidential online reporting tool
- Placing the concern in the 'Worry Box'

All pupils are encouraged to share concerns regarding socially unacceptable or bullying type behaviour that they experience, display or witness. They should not view this as 'telling' but rather 'talking about concerns' with the emphasis on 'getting help'.

Parents/Carers or Others Reporting a Concern:

In the first instance, parents/carers or others report concerns to their child's class/form teacher in one of the following ways:

- Speaking with the Class/Form Teacher through agreed channels e.g. by requesting a telephone call back via the school office or general email info@stmarys.limavady.ni.sch.uk
- By writing a note to a Class/Form Teacher
- By sending an email to a Class/Form Teacher

Please note, we do not advise parents to send confidential information regarding concerns of bullying type behaviour to the general school email address.

Should you continue to have concerns following contact with your child's class/form teacher contact the Year Head/Vice Principal/Principal.

Please note in the first instance teaching and support staff including teaching assistants, lunchtime supervisors, office staff etc should also report any concerns directly to the child's class/form teacher in a timely manner as above.

Responding to and Recording a Bullying Type Concern

It is the responsibility of all staff (including teachers, teaching assistants, wider support staff, office staff, supervisors etc) to report any bullying type of behaviour concerns. All allegations of bullying type behaviour will be responded to using the Statutory Process Flowchart (see appendix 2), recorded digitally on a Bullying Concern Assessment Form (BCAF) chart rt (see appendix 2), and stored on the

school data management system (EDIS). Records will be maintained in line with our Data Protection Policy in a private folder within central records, password protected and open only to key personnel e.g. SLT / DT/VP/P.

Upon receipt of a concern of bullying type behaviour, designated staff will:

- Clarify facts and perceptions.
- Check records and previous assessments.
- Collaboratively assess the incident using the T.R.I.P. criteria (Record on BCAF Part 1).

Where bullying type behaviour has been confirmed and in consultation with pupils involved and their parents/carers. Designated staff will ensure that parts 2-4 of the BCAF are completed will:

- Identify methods and potential motivating factors (Record on BCAF Part 2).
- Identify relevant level of support and intervention (Levels 1-4).
- Select appropriate support and interventions (see appendix 4) for all pupils involved (Record on BCAF Part 3a for the pupil experiencing and 3b for the pupil displaying).
- Ensure selected approaches are aligned to and in the context of wider safeguarding, SEND, Equality and diversity, and positive behaviour policies.
- Implement, track, monitor and record effectiveness of supports and interventions (BCAF Part 3).
- Review outcome of interventions (Record on BCAF Part 4).
- Select and implement further interventions as necessary.
- Based on the level of progress, revisit BCAF Parts 3a and 3b or proceed to case closure.

Please note details of support and intervention plans cannot be disclosed to anyone other than that pupil and their parents/carers.

Section 7: Monitoring and Review of Policy

The Act places responsibility on the Board of Governors, in consultation with the principal, to monitor the effectiveness of the Addressing Bullying Policy. To this end, the Board of Governors will:

- Maintain a standing item on the agenda, under Safeguarding, where a report on bullying type behaviour is presented by the principal (see appendix 7).
- A lead Governor (Mrs Julie McVeigh) to liaise with the principal .
- Minute the number of incidents including methods, motivations and how they were addressed.
- Identify trends and patterns to inform future policy and practice development and review.
- Record written responses to relevant pupils, parents/carers when appropriate.

The Addressing Bullying Policy will be reviewed in consultation with all school community stakeholders:

- at intervals of no less than four years
- following any complex incident which highlights the need for such a review,
- when reviewing other associated policies, such as the Safeguarding Policy and the Positive Behaviour Policy
- in response to a recommendation by the Education and Training Inspectorate
- following new guidance as directed by the Department of Education.

A copy of this policy is available online at stmaryslimavady.com. Parents/carers can also request a hard copy by contacting the school office info@stmarys.limavady.ni.sch.uk or (028) 77762360

Appendix 1:

The Legislative Context:

[Anti-discrimination laws applicable in Northern Ireland \(Equality Commission, 2024\)](#)

[The Addressing Bullying in Schools Act \(Northern Ireland\) 2016](#)

[Public Services Ombudsman Act \(Northern Ireland\) 2016](#)

[The Children's Services Cooperation Act \(Northern Ireland\) 2015](#)

[The Education \(School Development Plans\) Regulations \(Northern Ireland\) 2010](#)

[The Special Education Needs and Disability Order \(Northern Ireland\) 2005](#)

[The Special Educational Needs and Disability Act \(Northern Ireland\) 2016](#)

<https://www.legislation.gov.uk/nia/2016/8/contents>

[The Education \(Northern Ireland\) Order 1998](#)

[The Education and Libraries Order \(Northern Ireland\) 2003 \(A17-19\)](#)

[The Northern Ireland Act 1998 Section 75](#)

[The Human Rights Act 1998](#)

[The Children \(Northern Ireland\) Order 1995](#)

[The Health and Safety at Work Order \(Northern Ireland\) 1978](#)

The Policy & Guidance Context

[Implementing Trauma Informed Approaches in Northern Ireland and Executive Summary \(QUB and SBI, 2024\)](#)

[CCEA Relationships and Education Resource Guidance \(2024\)](#)

[ETI Safeguarding Proforma \(ETI, 2023\)](#)

[Nurture Group Provision Guidance for Schools \(DE, 2023\)](#)

Draft Consultation: [Consultation on the Statutory Guidance On The Reduction And Management Of Restrictive Practices In Educational Settings In Northern Ireland \(DE, 2023\)](#) DE, DoH & DoJ

[Children and Young Peoples Emotional Health and Wellbeing in Education Framework \(DE, 2021\)](#) DE/DoH

[A Life Deserved: Caring for Children and Young People in Northern Ireland \(DOH and DE, 2021\)](#)

[Suspensions and Exclusions for Pupils in Northern Ireland \(DE Circular, March 2021\)](#)

[Model Equality and Inclusion Policy and Guidance \(EA, 2020\)](#)

[Resource File for Children with Special Educational Needs \(DE, 2020\)](#)

[Guidance on Identifying and Supporting Learners with Social, Emotional and Behavioural Difficulties \(CCEA, 2020\)](#)

[Mental health care systems \(SBNI, 2019\)](#)

[The Addressing Bullying in Schools Act \(Northern Ireland\) 2016 Statutory Guidance for Schools and Boards of Governors \(DE, 2019\)](#)

[Putting Care into Education \(DE, 2018\)](#)

[Safeguarding and Child Protection in Schools: A Guide for Schools \(DE, 2017\)](#)

[Safeguarding Board for Northern Ireland Policies and Procedures \(SBNI, 2017\)](#)

[Co-operating to Safeguard Children and Young People in Northern Ireland \(Dept. of Health, Social Services and Public Safety, 2016\)](#)

[Miss School = Miss Out Improving Pupil Attendance Strategy \(DE, 2016\)](#)

[Pastoral Care in School: Promoting Positive Behaviour \(DE, 2001\)](#)

[Every School a Good School DE 2009 <https://www.education-ni.gov.uk/articles/every-school-good-school-esags>](#)

The International Context

[United Nations Convention on the Rights of the Child](#) (UNCRC)

To:

- Be protected from all forms of physical or mental violence, injury or abuse, maltreatment or exploitation (A,19)
- Be protected from discrimination (A, 2)
- Express their views, in a supported and accessible way, on issues that affect them, and to have their opinions taken seriously (A.12);
- Education. (A.28)