

To: Janet Finch  
Saunders, AM

Chair of the Petitions  
Committee

Via email only

03 July 2019

Dear Janet Finch Saunders,

Re: Petition P-05-862 Tackling School Bullying

Thank you for writing to me regarding the petition above. Since I commenced my term as Commissioner I have championed the need to take more effective approaches and strategies across Wales to prevent and tackle bullying.

My recommendations have been informed by a comprehensive evidence base developed through sustained engagement with thousands of children and young people in Wales. This extensive participatory research is detailed in full in my [policy position paper](#), which also draws upon wider research.

To summarise the evidence in brief, it shows us that bullying is a safeguarding issue that harms children's wellbeing and evidence from children and young people in Wales consistently shows that approaches to tackle and prevent bullying need to be more effective. A strong response is needed on a national level to make change.

I have repeatedly called on Government to respond. Analysis of children's experiences informed the 18 recommendations I made in my 2017 report [Sam's Story: Listening to Children and Young People's Experiences of Bullying in Wales](#) and I have also made recommendations about anti-bullying approaches in my last two [Annual Reports](#), both of which were accepted by Welsh Government. Most recently, in 2019, my office launched [Don't Worry, I'm Here for You: Children and Young People's Experiences of Cyberbullying in Wales](#), highlighting key findings from my 2018 consultation about cyberbullying.

My policy calls are drawn together and detailed in full in my [policy position paper](#), but I will summarise my key calls below. I have also emphasised these calls in my response to the Government's recent consultation on the redeveloped *Respecting Others* guidance. They are as follows:

- **Government must introduce a duty to record bullying in schools as an essential part of an effective anti-bullying approach.** Currently recording incidents remains entirely optional for schools and this will continue



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when the new Respecting Others guidance is launched as it has advisory status and lacks linkage with statutory mechanisms. This is unfair to children. There must be a stronger approach taken across Wales to better safeguard children and young people and recording should be part of this. Effective use of recording means that far better preventative and responsive work can develop at a school level and this means that fewer young people will bully, fewer will experience bullying, and responses to bullying will be more effective.

- **New anti-bullying guidance should be linked to other evaluation and accountability mechanisms.** The Estyn self-evaluation framework and tool could provide a mechanism for this: evaluation should include an assessment of how well the school is implementing the anti-bullying guidance, including having effective monitoring and recording systems for bullying. This could then be monitored at a national level through inspection. This would enable a system-wide improvement of the effectiveness of anti-bullying policies and approaches. The current redevelopment of Welsh Government's *Respecting Others* guidance is an important opportunity to integrate a preventative anti-bullying approach into the wider educational reforms in Wales but this opportunity is not currently being taken.
- **Anti-bullying guidance including a clear duty to record also needs to be integrated with other whole-school approaches to wellbeing.** Young people and children are repeatedly giving a clear message that more needs to be done to prevent and tackle bullying. Too often children and young people feel that bullying is not taken seriously by adults and that nothing is done when they report it. The lack of a strong national approach to date indicates that this inaction has been reflected at a Government level. There is a clear opportunity for the Government to remedy this now by ensuring that effective action on bullying forms part of their current development of a Whole school Approach to Wellbeing through the joint Ministerial advisory group and the Stakeholder Reference Group. Government should also ensure an effective way of enabling children and young people to participate in how action on bullying forms part of this approach.

I will continue to push for Government to develop a strong national approach and to strengthen the impact of new guidance by linking it to the evaluation framework, which must include a duty to record and monitor bullying. Bullying has serious and long-lasting impacts: it prevents children and young people from experiencing their human rights, including their rights to be safe and to have an education. At the moment the law doesn't require schools to record and monitor bullying but our young people in Wales do. Government must link any new



guidance to a clear duty to record bullying in school-evaluation to ensure this happens.

Yours sincerely,



Sally

Sally Holland  
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Children's Commissioner for Wales