حكومة دبي
GOVERNMENT OF DUBAI

DUBAI
Knowledge المعرفة

Anti-Bullying Policy Template and Good Practice Guide



Safe Space implementation resource

Field	Details
Resource title	Anti-Bullying Policy Template and Good Practice Guide
Resource type	Policy template
Policy Framework section	3.4 Safeguarding in the curriculum, 3.4.1 Anti-bullying, 3.4.2 Digital safety, 5 Safeguarding processes
Relevant MUST directives	Section 3 Safeguarding Foundations (Directives 1 to 81) Section 5 Safeguarding Processes for Managing Concerns (Directives 179 to 260) Section 6 Safeguarding Rigour (Directives 261 to 297)
Version	1.0
Review	Reviewed annually, and sooner following changes to United Arab Emirates (UAE) legislation or the Knowledge and Human Development Authority (KHDA) Policy Framework.

This document aligns with the KHDA Policy Framework for Safeguarding and Learner Protection in Dubai's Private Educational Institutions (2026).

Source, basis and scope

This template supports institutions in establishing anti-bullying arrangements that prevent, identify, respond to, and record all forms of bullying, including cyberbullying, as part of the safeguarding system. This resource is designed to support implementation of the KHDA Policy Framework MUST directives and should not be used to reduce or replace any requirement in the Framework.[1]

Institutions may implement anti-bullying arrangements appropriate to their size, learner profile, sector and operating model, provided that the requirements of the policy framework are adequately addressed, implemented and evidenced.

The content is written for all KHDA-permitted private educational institutions unless a sector adaptation box states otherwise. Institutions must adapt role names, contact details and operational arrangements to their approved structure without weakening the safeguarding standard.

The Anti-Bullying definition serves as an international reference point because it is clear and widely used. Institutions must apply the KHDA Policy Framework definition and align all responses with Dubai and UAE requirements[2]

Required implementation standard

- The institution must have effective anti-bullying arrangements to prevent, identify, and address all forms of bullying, including cyberbullying.
- Respectful behaviour and inclusion must be promoted consistently across curriculum provision and the wider educational environment.
- The curriculum must include age and culturally appropriate anti-bullying education covering respectful relationships, inclusion, diversity, consent, emotional wellbeing, and responsible behaviour.
- Learners must have structured opportunities to engage with anti-bullying education and awareness activities.
- Staff must respond promptly to bullying and report concerns in accordance with institutional procedures, including referral to the Child Protection Coordinator (CPC)/ Designated Safeguarding Lead (DSL) for review and determination of appropriate management. All staff must refer concerns about bullying to the CPC/DSL in accordance with KHDA Directive 28.
- Bullying concerns must be recorded, reviewed and escalated through safeguarding arrangements where risk to safety or wellbeing is indicated.

[1] KHDA Policy Framework for Safeguarding and Learner Protection in Dubai's Private Educational Institutions, 2026.

[2] Anti-Bullying, definition of bullying, describes bullying as repetitive, intentional hurting involving an imbalance of power, occurring face-to-face or online.

Suggested anti-bullying policy template

1. Policy statement

[Institution name] is committed to providing a safe, respectful and inclusive learning environment where bullying is prevented, identified and addressed promptly. Bullying is always treated seriously, and where bullying indicates a risk of harm, it will be managed through safeguarding procedures and reviewed by the CPC/DSL.

2. Definition

For this policy, bullying generally involves repeated and intentional harm caused by an individual or group, involving a real or perceived power imbalance. A single serious incident may also require intervention and a safeguarding review, depending on its nature, impact, and associated risk. It may be physical, verbal, emotional, social or digital. Bullying can happen face-to-face, online, on transport, during off-site activities, through social exclusion, through misuse of images or messages, or through behaviour linked to prejudice, vulnerability or difference. This includes prejudice-based bullying, where the behaviour is motivated by a protected characteristic such as race, religion, disability, gender, sexual orientation or other personal differences.

Conflict, disagreement, or a single act of unkindness, while always requiring a proportionate response, does not in itself meet the definition of bullying. Where behaviour is repeated, intentional and involves a power imbalance, it is bullying. Where there is doubt about classification, the concern must still be taken seriously, and CPC/DSL advice sought.

3. Prevention arrangements

- Teach age-appropriate anti-bullying education through curriculum and pastoral programmes.
- Promote respectful behaviour, inclusion, belonging, and safe help-seeking in daily institutional life.
- Use learner voice mechanisms to understand where learners feel safe or unsafe.
- Provide clear reporting routes for learners, staff and parents, guardians or custodians.
- Provide targeted supervision and support in locations or times where bullying risk is higher.
- Give particular attention to the prevention and early identification of bullying involving Students of Determination (learners with disabilities or special educational needs), who are at statistically elevated risk. Ensure reporting routes, prevention activities and safety planning are accessible and adapted to their communication needs. Involve the inclusion lead and, where relevant, the CPC/DSL, in monitoring and response arrangements for this group.
- Provide parent, guardian or custodian information on bullying, cyberbullying and how to raise concerns.

4. Response pathway

Stage	Required action	Safeguarding link
Recognise	Take all reports seriously, including learner disclosures, parent concerns, staff observations, digital evidence or pattern data.	Staff do not need proof to raise a concern.
Respond	Check immediate safety, listen calmly, reassure the learner, and avoid blaming language.	If there is immediate risk, follow safeguarding and emergency procedures.
Report	Report bullying concerns to the CPC/DSL or Deputy CPC/DSL where harm, risk, repeated behaviour, vulnerability, coercion, sexualised behaviour, cyberbullying or escalation is indicated. Staff must report any concern on the same day, and no later than 24 hours after becoming aware of it. The CPC/DSL must acknowledge receipt and conduct an initial triage within 24 hours of receiving the report.	Directive 28 requires staff to report bullying concerns to the CPC/DSL for review and determination of appropriate management.
Record	Record facts, learner voice, evidence, actions, parent contact, risk assessment and outcome.	Use the safeguarding case management system when a safeguarding concern is indicated.
Assess	Consider intent, repetition, power imbalance, impact, vulnerability, digital context, group dynamics and previous concerns.	Apply safeguarding thresholds where risk to safety or wellbeing is indicated.
Support and intervene	Support the learner harmed, address behaviour of the learner displaying bullying behaviour, involve parents, guardians or custodians where the learner is under 18 (for learners aged 18 and above, with the learner's consent where appropriate and safe, recognising that consent is not required where there is a risk of harm), and implement supervision or safety planning. Use restorative approaches where appropriate, once immediate safety has been established.	Support must not replace safeguarding action where risk exists.
Review	Check that bullying has stopped, the learner feels safe, actions are effective, and any wider culture or supervision issue is addressed.	Use monitoring data to identify systemic risks. Document the impact of interventions by recording whether reported incidents decreased and whether the affected learner confirmed feeling safe: this is the evidence that a strategy works, not simply that one exists.

5. Cyberbullying and digital evidence

Cyberbullying must be addressed through both anti-bullying and digital safety arrangements. Learners and families should be encouraged to preserve relevant evidence, such as messages or screenshots, in accordance with institutional procedures and without unnecessarily sharing, forwarding or reproducing harmful content. United Nations Children's Fund (UNICEF) guidance notes that reporting and preserving evidence can support action where cyberbullying occurs.[3]

Cyberbullying arrangements must align with the institution's digital safety policy and implementation guidance (available on the KHDA Safe Space portal). Both documents must be read and applied together. Where cyberbullying involves harmful sexual images, manipulation of content generated by artificial intelligence (AI), or content that may be illegal, the CPC/DSL must be consulted before any action is taken with the learner, their family or third parties.

- Do not ask learners to show sexual images or harmful content to multiple adults.
- Follow relevant legislation, the policy framework, and institutional policy regarding cyberbullying, including manipulation of AI images.
- Do not print, forward or store illegal or harmful sexual content outside approved safeguarding procedures.
- Seek CPC/DSL advice before contacting other learners, parents or platforms where this may increase risk.

Step-by-step implementation guidance for institutions

1. Adapt the policy statement, definitions, and reporting routes to the institution’s context.
2. Map anti-bullying arrangements to behaviour, safeguarding, digital safety, inclusion, wellbeing, attendance, transport and off-site policies as a minimum.
3. Plan age-appropriate curriculum and awareness activities across the year.
4. Train staff to distinguish conflict, unkindness, bullying and safeguarding risk, while ensuring all concerns are taken seriously.
5. Create learner-friendly reporting routes and explain what happens after a concern is raised.
6. Monitor bullying records, learner voice, attendance, behaviour, wellbeing and digital safety data for patterns.
7. Report to governance termly through anonymised safeguarding and wellbeing data.

[3] UNICEF, Cyberbullying: What is it and how to stop it, states that reporting is key and that preserving relevant screenshots or messages can help show what has been happening. https://www.unicef.org/stories/how-to-stop-cyberbullying

Roles and responsibilities

Role	Required responsibilities
Board or Governing Body	Approve the policy, where required by governance arrangements, scrutinise anonymised bullying and safeguarding trends, and ensure improvement actions are tracked.
Head of Institution	Ensure anti-bullying arrangements are implemented, resourced and linked to safeguarding, curriculum, behaviour and wellbeing. Ensure all staff receive training on anti-bullying, cyberbullying and distinguishing bullying from conflict and safeguarding risk, in line with KHDA training requirements (Policy Framework Section 4.2).
CPC/DSL	Review bullying concerns where safeguarding risk may be indicated, apply thresholds, advise on support and escalation, and monitor patterns.
Deputy CPC/DSL	Support triage, learner safety planning, case recording and follow-up.
Pastoral, inclusion, wellbeing and digital safety leads	Coordinate prevention, support plans, learner voice, curriculum input and targeted intervention.
All staff	Promote respectful behaviour, identify concerns, respond promptly, report to the CPC/DSL where required and record concerns factually.
Learners	Contribute to respectful culture, use reporting routes, support safe peer behaviour and participate in age-appropriate awareness activities.
Parents, guardians or custodians	Receive information, report concerns promptly, support agreed actions and avoid actions that escalate risk online or in the community.
Third-party providers and transport staff	Follow the institution's anti-bullying and safeguarding reporting route during activities, transport or external provision.

Sector adaptation box

Sector	Adaptation
Early childhood centres	Use developmentally appropriate language. Repeated hurtful behaviour may not always meet the bullying definition but must still be addressed through supervision, behaviour support and safeguarding judgement.
Schools	Include playground, classroom, online, bus, sports, changing, social group, friendship, prejudice-based and child-on-child abuse contexts.
Higher education and training or vocational institutes	Include help-seeking and mental health concerns across adult learner contexts, power imbalances in groups, online harassment, placements, internships, accommodation (if relevant), and respectful conduct expectations for learners aged 18 to 21.

What good practice looks like

- Bullying is addressed as an institution-wide safeguarding and culture issue, not simply a behaviour management issue.
- Learners can explain how to report concerns and are confident that adults will take appropriate action.
- Records show risk assessment, learner voice, actions taken, review and whether the bullying has stopped.
- Data is analysed by location, time, year group, type, vulnerability, online context and recurrence.
- Prevention work is informed by learner voice and current patterns of concern.

Common compliance weaknesses or implementation risks

- Bullying is handled only as a behaviour and discipline issue without CPC/DSL review where risk is indicated. Where bullying indicates risk of harm, exploitation, coercion or a pattern of behaviour, it must be managed through safeguarding procedures and not resolved solely through disciplinary processes. Disciplinary action and safeguarding response may run concurrently. CPC/DSL advice must be sought before closing a concern as a disciplinary matter alone.
- Cyberbullying is dismissed because it happened outside institution hours.
- Learners harmed by bullying are expected to resolve it themselves.
- Parent communication happens before considering safeguarding risk or retaliation.
- Records do not capture the power imbalance, repetition, impact, or learner voice.
- Data is not analysed for repeated locations, groups or vulnerable learners.
- Staff download or share digital bullying evidence through their own devices.

Evidence to retain for audit, inspection or KHDA review

- Approved anti-bullying policy and good practice guide.
- Curriculum map showing anti-bullying and digital safety education.
- Learner-friendly reporting materials.
- Staff training records and scenario materials.
- Bullying and safeguarding records with risk assessment and follow-up.
- Learner voice data, survey outcomes and action logs.
- Termly governance reports showing anonymised trends and improvement actions.
- Evaluation of the impact of preventative anti-bullying work.

Suggested review frequency

Review annually, termly through monitoring data, and immediately after significant bullying incidents, emerging digital risks, learner voice concerns, or evidence that arrangements are ineffective.

Minimum compliance self-check

Question	Evidence expected
Does the policy cover all forms of bullying, including cyberbullying?	Policy wording, digital safety links, curriculum map.
Do staff members clearly understand when bullying must be reported to the CPC/DSL?	Training records, staff guidance, case audit.
Are learners given safe and accessible reporting routes?	Learner materials, posters, digital routes, learner survey results.
Are bullying records reviewed for patterns and repeat concerns?	Trend analysis, safeguarding meeting notes, governance reports.
Do interventions check that the learner is safe at present?	Review records, learner voice, parent communication records.

References

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