



**RUNNYMEDE TRUST WRITTEN CONSULTATION RESPONSE TO:  
Recording and Reporting Incidents of Bullying Between Pupils, and Incidents of Abuse  
against School Staff  
4 March 2010**

**CHAIR**  
Clive Jones CBE

**TRUSTEES**  
Aaqil Ahmed  
Dr Claire Alexander  
Barbara Cohen  
Farzana Hakim  
Michelle Moore  
Hitesh Patel  
Roy Williams

**Contact details:**

The Runnymede Trust  
7 Plough Yard  
London EC2A 3LP  
Tel: 020 7377 9222

Email: [debbie@runnymedetrust.org](mailto:debbie@runnymedetrust.org)

Web: [www.runnymedetrust.org](http://www.runnymedetrust.org)

We welcome the opportunity to submit our response to the Department for Children, Schools and Families consultation on “Recording and Reporting Incidents of Bullying Between Pupils, and Incidents of Abuse against School Staff”.

The Runnymede Trust is an independent policy research organisation focusing on equality and justice through the promotion of a successful multi-ethnic society. Our mandate is to promote a successful multi-ethnic Britain – a Britain where citizens and communities feel valued, enjoy equal opportunities to develop their talents, lead fulfilling lives and accept a collective responsibility, all in the spirit of civic friendship, shared identity and a common sense of belonging. Runnymede has been active in the field of education for many years. Within our current education work we devise and promote practical strategies for use in the classroom and, at community level, we aim to address and support the specific needs of minority ethnic young people. Further we focus on identifying, sustaining and augmenting improvements in race equality and social cohesion in the changing terrain of education policy and practice

Runnymede has been closely involved in the development of the consultation document detailing the new proposals with regard to the recording of bullying incidents among pupils and against staff, as we were part of the advisory group set up by the DCSF to assist with the development of these proposals. We welcome therefore the scope of this new document and broadly support the proposed new duty to be imposed upon the governing bodies of all maintained schools for the introduction of systems for the recording of incidents of bullying between pupils and incidents of abuse against staff. We agree that having the ability to refer to data they have collected will enable schools to monitor these incidents and act accordingly to ensure that future such activity is specifically prevented. Making recording compulsory will further ensure that monitoring of this nature occurs across all schools rather than being limited solely to those schools that have been active in keeping good clear records.

We are concerned however that the proposed duty to record does not currently extend to a duty to **report** and as noted in paragraph 3.18 of the consultation document would suggest it necessary that incidents recorded be reported both at a local level and to central government. We fully agree, as noted within this part of the consultation paper, that reporting allows the body reported to, to make note of any trends and target support to those schools that would clearly benefit from it. Giving local authorities the ability to assess how trends are developing in this respect is vital if schools are to be assisted with identifying areas where intervention may be necessary. Further, providing central government with locally collected information will help in a wide array of policy development, be this in its attempts to synchronise work on all the equality strands following the proposed enactment of legislation in this area or indeed to be able to draw the links between the educational underachievement of specific groups of children and their experiences of various forms of bullying. Reporting as well as recording, hence, incidents of bullying **by type**, as is proposed by the DCSF is also strongly advocated by us.

We are more deeply concerned about the omission within the proposals of a duty to both record and report **racist incidents** by schools to local authorities and indeed to central government. We are aware of the existing procedures within schools to record and report racist incidents and that DCSF guidance to schools on this issue notes that schools **must** record and report at least annually all such incidents to local authorities<sup>1</sup>. There are many schools that have duly recorded and reported incidents and though there has been some degree of consternation at the numbers of incidents reported,<sup>2</sup> which is linked to a worrying wider set of issues about those who promote race equality in schools and concern about the divisions and unnecessary awareness about difference that this can cause,<sup>3</sup> awareness about these incidents is necessary and important. That schools are recording and reporting these incidents, not only demonstrates to any child or parent that their experiences of racism are being taken seriously<sup>4</sup>, but also provides evidence that schools are working pro-actively to support not only victims but those who have engaged in activity that has caused offence to another.

To omit from the proposed duty the necessity of both recording and reporting racist incidents is problematic in our view and would represent a backward step given the important work the DCSF has done with regard to supporting schools in the way issues of racism are tackled. Schools are currently under a duty to promote race equality and good race relations under the Race Relations (Amendment) Act 2000, and though there are plans to create more generic equality duties for all equality streams under the Equality Bill, requiring schools to continue to note and report racist incidents will clearly fall under their existing race equality duties and indeed any future equality duties. Section 3.4 of the consultation document notes that the duty to record levels of bullying would not only enable schools to meet their race equality

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<sup>1</sup> Recording and Reporting Racist Incidents Guidance: The Ethnic Minority Achievement Unit, 2006, <http://www.ttrb.ac.uk/attachments/a0477498-4988-44d2-b962-59a828a71268.pdf>

<sup>2</sup> Beckford, A, 2009, 'Schools report 40,000 cases of racism a year', *The Telegraph*, <http://www.telegraph.co.uk/education/educationnews/6454857/Schools-report-40000-cases-of-racism-a-year.html>

<sup>3</sup> Hart, A, 2009, *The Myth of Racist Kids – anti-racism policy and the regulation of school life*, Manifesto Club

<sup>4</sup> Miles, B, 2009, 'Prevention and the role of education: reporting and challenging racism – an opportunity won or lost?', *Race Equality Teaching*, Trentham Books

duties, but also their duty to promote community cohesion, introduced under the Education and Inspections Act 2006. The monitoring of bullying by type, that includes that related to race, religion or culture as noted in the consultation document could indeed assist schools in this regard, but only partially. As it stands, the recording and reporting of racist incidents goes beyond incidents of bullying and the restriction in the definition of terms of bullying as noted in section 3.14, to physical or verbal abuse causing ‘harm or distress to the individual concerned’ does not include many of the wider issues that combine to create a racist incident. Not all racist incidents are incidents of bullying. Recommendation 12 of the Macpherson Report on the Stephen Lawrence Inquiry noted that a racist incident is one ‘which is perceived to be racist by the victim or any other person’<sup>5</sup>. DSCF guidance on the recording and reporting of racist incidents notes that incidents can include both verbal and physical abuse, but can also include apparently ‘victimless’ incidents, such as racist graffiti, the wearing of symbols or signifiers of groups that promote race hatred such as badges, stickers etc.

The decision to limit the definition of bullying to physical and verbal abuse is noted within the consultation document as an attempt to remove some of the bureaucratic pressures faced by schools. Indeed the recent critique of the recording and reporting of racist incidents by Adam Hart pilloried the time consuming practice of recording often very small incidents for teachers<sup>6</sup> and schools have themselves noted the inherent bureaucracy involved in the recording of racist incidents, whilst highlighting confusion about what such incidents entail.<sup>7</sup> It is however our contention that referring solely to instances of verbal and physical abuse within the proposed definition of bullying will fail to address those apparently ‘victimless’ incidents, which though not appearing to target any specific individual pupil or teacher within the school, can lead to distress, worry and overall negative impact upon the (either working or academic) performance of those from Black and minority ethnic backgrounds teaching or learning within that educational institution.

Though we have noted elsewhere that it is problematic to focus exclusively on racist incidents without acknowledging the wider context within which those incidents occur, specifically in majority white schools<sup>8</sup>, we would not dismiss the utility of the recording and reporting of a racist incident as a means of helping schools to address the problems being experienced by their minority of BME pupils.

Finally we welcome the focus on teachers who may be the victims of abuse. Work that has explored the approach of schools with majority white pupil cohorts to issues of race and racism have noted the often negative experiences of teachers from minority ethnic backgrounds in these institutions<sup>9</sup> and it is important that those individuals receive the support that is necessary to overcome racist abuse either from other staff members (though this is clearly an issue covered by employment legislation), pupils and the parents of those pupils. We would however specifically

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<sup>5</sup> Macpherson of Cluny, Sir W (1999) *The Stephen Lawrence Inquiry*, TSO, [www.archive.official-documents.co.uk/document/cm42/4262/4262.htm](http://www.archive.official-documents.co.uk/document/cm42/4262/4262.htm)

<sup>6</sup> Hart, 2009 *ibid*

<sup>7</sup> Ofsted, 2005, *Race Equality in Education*, London: Ofsted

<sup>8</sup> Asare, Y, 2009, *‘Them and Us’: Race Equality Interventions in Predominantly White Schools*, Runnymede

<sup>9</sup> Gaine, C, 1987, *No problem Here: A practical approach to education and race in White schools*, Hutchinson; Gaine, C, 2006, *We’re all White Thanks: The persisting Myth about ‘White’ Schools*, Trentham

draw attention to the experiences of BME teachers who experience not only bullying from pupils in white majority schools, but the wider experience of racism and racist incidents which extend beyond individual pupils, to their parents and members from the wider community in which that particular school may be situated. We would further add that though the consultation document focuses on pupil to pupil bullying, and pupil to staff bullying, it does not also note, teacher to pupil bullying. It is clearly not the case that incidents of this kind do not occur, and we would suggest that any focus on bullying, includes reference to this issue.

We hope that these comments provide a useful contribution to the consultation process and look forward to reading the finalised text of the new duty once published.

Yours sincerely

Dr Debbie Weekes-Bernard  
Senior Research & Policy Analyst