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## AIS-Salzburg Anti-Bullying and Anti-Cyberbullying Policy

### 1. Commitment and Purpose

AIS-Salzburg is a small international boarding and day school in which students study, live, travel, compete, celebrate, and spend much of their daily lives together. Because most students are full boarders, bullying can affect not only a classroom or friendship, but also a student's sense of safety, belonging, and security at home within the residential community.

Every student should feel known, respected, supported, and able to participate fully in school life. Bullying, cyberbullying, harassment, intimidation, retaliation, and deliberate exclusion are inconsistent with the mission and values of AIS-Salzburg and will not be tolerated.

Our small size allows faculty, Resident-Care staff members, and administrators to know students well, notice changes early, and respond personally. This closeness also creates a shared responsibility. Concerns should not be dismissed as ordinary boarding-school tensions or left for someone else to address. Early, thoughtful action often prevents an isolated difficulty from becoming a harmful pattern.

The purpose of this policy is to:

- prevent bullying and cyberbullying;
- help students and employees recognize concerning behavior;
- provide a clear and practical reporting procedure;
- ensure that concerns are addressed fairly, promptly, and consistently;
- protect and support students who are affected; and
- help students who have engaged in bullying understand the harm caused, accept responsibility, and change their behavior.

This policy should be read with the *Student Life Handbook*, *Child Protection Policy and Procedures*, *Equality and Diversity Policy*, *Faculty Handbook*, *Resident-Care Staff Handbook*, and *Data Protection and Information Governance Policy*.

### 2. Scope

This policy applies to all students, employees, parents and guardians, volunteers, contractors, and visitors involved in the life of AIS-Salzburg.

It applies throughout the academic and residential programs, including:

- classrooms, study halls, residence floors, meals, and common areas;
- athletics, activities, clubs, excursions, and school travel;
- free time, weekends, transportation, and off-campus privileges;
- school-sponsored events and summer programs; and
- online communication, social media, messaging applications, gaming platforms, email, group chats, and other digital spaces.

The policy may apply to conduct that occurs away from campus or outside normal school hours when it affects a student's welfare, relationships within the school community, or the safe and effective operation of the school.

Online conduct is treated in the same manner as conduct in person. A message, image, recording, post, group chat, or other digital communication may fall within this policy even when it was created or shared away from campus.

Bullying may occur between students, within a group, or through the actions of several people. Concerns involving an employee, an adult, abuse of authority, sexual misconduct, or possible harm to a child will also be addressed under the appropriate safeguarding or employment procedures.

### **3. Definition of Bullying**

Bullying is repeated or sustained behavior that intentionally or knowingly causes physical, emotional, social, or psychological harm and involves an actual or perceived imbalance of power. The imbalance of power may arise from age, physical strength, social influence, popularity, access to information, membership in a group, seniority, language ability, boarding status, or another circumstance that makes it difficult for the affected person to defend themselves or bring the behavior to an end.

Bullying may be direct or indirect. It may involve one student or a group and may take place in person or online. Not every disagreement, argument, unkind comment, or friendship difficulty is bullying. Students living closely together will sometimes misunderstand, frustrate, or offend one another. Ordinary conflict generally involves students of relatively equal power who may both contribute to the disagreement and are able to take part in resolving it.

A serious single incident may not meet the usual definition of bullying, but it will still be addressed. Violence, threats, harassment, discrimination, sexual misconduct, coercion, hazing, intimidation, or deliberate humiliation may require immediate action even when the behavior has occurred only once.

The school will consider the whole situation, including:

- what occurred and how often;
- the age and understanding of those involved;
- whether there was an imbalance of power;
- the effect on the student concerned;
- whether the behavior was planned, encouraged, or repeated by a group;
- whether prejudice, discrimination, or retaliation was involved; and
- whether the conduct has affected the student's safety, well-being, learning, or participation in residential life.

### **4. Forms of Bullying and Cyberbullying**

Bullying can take many forms and may involve behavior that is physical, verbal, social, emotional, sexual, discriminatory, or digital.

Physical bullying may include hitting, pushing, restraining, threatening physical harm, damaging possessions, taking belongings, or using physical size or strength to intimidate another person.

Verbal or emotional bullying may include repeated insults, threats, humiliation, ridicule, offensive nicknames, hostile imitation, or comments intended to undermine a person's confidence, identity, or sense of belonging.

Social or relational bullying may include deliberate exclusion, spreading rumors, manipulating friendships, encouraging others to reject someone, isolating a student from a group, or repeatedly making participation in community life difficult or humiliating.

Prejudice-related bullying is connected with a person's race, color, nationality, ethnicity, language, religion or belief, sex, sexual orientation, gender identity or expression, disability, medical condition, appearance, family circumstances, socioeconomic background, or another personal characteristic. Such conduct is especially serious because it may also involve discrimination or harassment.

Sexual bullying may include unwanted sexual comments, rumors, gestures, images, messages, pressure, humiliation, or conduct related to a person's body, sexuality, relationships, or identity. Serious concerns will be addressed under safeguarding and student-conduct procedures.

Cyberbullying is bullying carried out through digital communication or technology. It may include:

- threatening, humiliating, or abusive messages;
- deliberate exclusion from online groups;
- sharing private information, images, or recordings without consent;
- impersonating another person or using their account;
- spreading rumors or harmful content;
- repeated monitoring, harassment, or unwanted contact; or
- encouraging others to target, ridicule, or isolate someone.

Because students live together, online conduct can quickly affect classroom relationships, roommate arrangements, residence floors, activities, meals, and free time. Cyberbullying may therefore require action even when the communication began away from campus or on a personal device.

Bullying is not excused because it was described as humor, banter, tradition, initiation, retaliation, or a misunderstanding. The school will consider both the context and the effect of the behavior on the person concerned.

## **5. Bullying, Conflict, and Other Harmful Conduct**

Students in a small boarding community live and work closely together. Disagreements, friendship changes, misunderstandings, and occasional unkind behavior will occur. These situations require attention, but they are not always bullying.

Ordinary conflict generally involves students of relatively equal power who may both contribute to the disagreement and are able to take part in resolving it. Bullying involves repeated or sustained targeting, harm, and an imbalance of power that makes it difficult for the affected student to protect themselves or bring the behavior to an end. Staff should not dismiss harmful conduct simply because it does not meet the full definition of bullying. A single act of violence, serious intimidation, harassment, discrimination, sexual misconduct, hazing, coercion, or deliberate humiliation may require immediate intervention under the Student Life Handbook, Equality, Diversity, and Inclusion Policy, or Child Protection procedures.

The school will respond according to the nature and seriousness of the conduct rather than the label initially used to describe it. The first priority will always be the safety, dignity, and well-being of the students involved.

## **6. Recognizing Concerns**

Because faculty and Resident-Care staff members know students well and see them in different settings, they are often able to notice changes before a student makes a formal report. No single sign proves that bullying is occurring, but patterns or significant changes should be taken seriously.

Staff should remain attentive to:

- repeated exclusion, ridicule, intimidation, threats, or targeting;
- changes in friendships, roommate relationships, or social groups;
- reluctance to attend class, meals, activities, study hall, or return to a residence floor;
- distress, anger, or withdrawal following online activity;
- damaged or missing belongings or unexplained injuries;
- changes in attendance, participation, sleep, appetite, academic performance, or general well-being;
- repeated use of demeaning names, stereotypes, or humiliating jokes;
- a student becoming unusually dominant, controlling, fearful, isolated, or dependent within a friendship group; and
- retaliation or increased exclusion after a concern has been raised.

Staff should rely on observation and factual information rather than stereotypes about who may be bullied or who may engage in bullying. A confident, popular, successful, or physically strong student may be affected by bullying, and a quiet or vulnerable student should not automatically be viewed only as a target.

Concerns may become visible in one setting but originate in another. Online conduct may affect classroom participation, boarding relationships, activities, meals, or free time. Faculty and Resident-Care staff members should therefore communicate promptly when they notice relevant changes or patterns.

## **7. Responsibilities**

Preventing and responding to bullying is a shared responsibility. Every member of the community has a role, but employees have a professional duty to act when they witness, receive a report of, or reasonably suspect bullying or related harmful conduct.

All employees must:

- take immediate reasonable steps to protect a student who may be unsafe;
- listen calmly and take concerns seriously;
- avoid promising complete confidentiality;
- record relevant information accurately and objectively;
- report concerns promptly to the Headmaster or Dean of Students;
- preserve available evidence where appropriate;
- continue appropriate supervision and support; and
- avoid investigating the matter independently unless directed to do so.

The Dean of Students will normally coordinate concerns involving student-to-student behavior, boarding life, activities, friendships, roommate relationships, and student conduct.

The Headmaster retains overall responsibility for this policy and will directly manage or oversee serious or repeated cases, allegations involving employees, major safeguarding concerns, conflicts of interest, cases that may require the Disciplinary Committee, and contact with external authorities.

The Child Protection Team will be involved when bullying also raises a safeguarding concern or when the Headmaster determines that coordinated review and support are necessary.

Students are expected to avoid bullying, report serious concerns, support students who seek help, and provide honest information. A student should not join in, encourage, share, forward, or approve harmful conduct simply to remain accepted by a group.

Parents and guardians are expected to raise concerns promptly, provide relevant information, encourage their child to speak honestly, preserve digital evidence where appropriate, and work constructively with the school.

## **8. Reporting a Concern**

A student may speak with any trusted employee. The student is not required to determine whether the conduct meets the formal definition of bullying before asking for help. A concern may be reported verbally or in writing to a teacher, Resident-Care staff member, the Dean of Students, the Headmaster, the Child Protection Lead, or another appropriate administrator. A student may ask a friend, parent, guardian, advisor, or trusted adult to assist them or attend a meeting.

The person making the report should provide as much information as they reasonably can, including:

- what happened;
- when and where it occurred;
- who was involved;
- whether anyone witnessed it;
- whether it has happened before;
- whether there is digital or other evidence; and
- whether anyone currently feels unsafe.

A student should not delay reporting because they are uncertain, embarrassed, afraid of making matters worse, or unable to provide complete information. Employees receiving a report must listen, clarify only what is necessary to understand immediate safety and the basic facts, make an objective record, and report the concern promptly. They must not repeatedly question the student or begin their own investigation. Anonymous reports will be considered, although anonymity may limit the school's ability to ask questions, verify information, communicate an outcome, or take formal action.

## **9. School Response Procedure**

The school will respond in a manner that is prompt, fair, proportionate, and appropriate to a small community in which students continue to study and, in most cases, live together.

The response will normally follow these steps:

1. Protect. Immediate safety, medical, emotional, academic, and residential needs will be considered. Temporary arrangements may be made where necessary.
2. Listen. The student will be given an opportunity to explain what happened and what support they need.
3. Record. Relevant facts, dates, locations, witnesses, words used, actions taken, and available evidence will be documented.
4. Report and assign. The Headmaster or Dean of Students will determine who will manage the matter and whether safeguarding or another school procedure applies.
5. Assess and gather information. The person managing the case will speak separately with relevant students and witnesses and review available evidence. Each person will be treated fairly and without premature judgment.
6. Respond. The school will determine appropriate support, protective measures, educational action, and disciplinary consequences. Parents or guardians will be informed when appropriate.
7. Follow up. The school will monitor the students involved, relevant relationships, the boarding or academic environment, and any risk of retaliation or recurrence.

The staff member who first receives a concern may continue as a trusted source of support but will not necessarily manage the case. Responsibility may be transferred to preserve impartiality, avoid a conflict of interest, or ensure that the person with the appropriate authority and experience responds.

The school will share the outcome with those directly involved as far as safeguarding, privacy, and data-protection requirements permit. Confidential disciplinary information concerning another student or employee will not normally be disclosed.

## **10. Support, Protection, and Follow-Up**

Students who report bullying should be treated with care and respect. They should not be blamed for the conduct, required to confront the person involved, or expected to resolve a serious concern without adult support.

Support for a student who has been affected may include:

- regular contact with a trusted employee;
- temporary changes to supervision, seating, rooms, groups, schedules, activities, or study arrangements;
- help preserving evidence or reporting online material;
- academic, pastoral, medical, or counseling support;
- communication with parents or guardians;
- protection from contact, retaliation, or further exclusion; and
- scheduled follow-up to confirm that the behavior has stopped.

Protective arrangements should not unnecessarily restrict, isolate, or disadvantage the student who raised the concern. Where practical, the burden of change should not fall primarily on the affected student.

A student who has engaged in bullying will also receive appropriate guidance and support. This does not remove accountability. The purpose is to help the student understand the harm caused, accept responsibility, change the behavior, and participate safely and respectfully in the community.

Support and intervention may include a clear statement of expectations, parent involvement, reflection or educational work, a behavior or support plan, closer supervision, restrictions, restorative action, or access to appropriate outside support.

Restorative meetings or mediation will be considered only when they are safe, appropriate, and voluntarily accepted by the affected student. They will not be used to minimize serious conduct or pressure a student into direct contact.

Follow-up is essential in a boarding school because students may continue to share classes, meals, activities, friendship groups, and residential spaces. The Headmaster or Dean of Students will determine who will monitor the situation and how relevant concerns will be communicated to staff members who need to know.

## **11. Consequences and Educational Responses**

The purpose of the school's response is not simply to impose consequences, but to protect students, stop harmful behavior, restore a safe community, and help students develop greater judgment, empathy, and personal responsibility. When bullying is substantiated, the school will determine an appropriate response based on the circumstances of the case.

In doing so, the school will consider:

- the seriousness, frequency, and duration of the behavior;
- the age and understanding of the students involved;
- the degree of harm caused or reasonably foreseeable;
- any imbalance of power;
- whether discrimination, harassment, retaliation, or sexual misconduct was involved;
- previous concerns or disciplinary history;
- the student's willingness to accept responsibility and change the behavior; and
- the continuing safety and well-being of those affected.

Depending upon the circumstances, the school's response may include guidance, restorative action, increased supervision, loss of privileges, changes to residential or academic arrangements, behavioral contracts, disciplinary probation, suspension, referral to the Disciplinary Committee, expulsion, or referral to external authorities where required by law.

Where appropriate, students should be encouraged to understand the impact of their behavior, repair damaged relationships, and make constructive changes. Restorative approaches may be valuable educational tools but are not appropriate in every situation and will never replace necessary disciplinary action or safeguarding measures.

## **12. Prevention**

The most effective way to address bullying is to prevent it from becoming part of the culture of the community. Every employee contributes to this through daily interactions with students.

AIS-Salzburg seeks to maintain a boarding and academic environment in which courtesy, respect, inclusion, and personal responsibility are the norm. Students should feel that they are known as individuals, that concerns will be taken seriously, and that asking for help is viewed as a sign of maturity rather than weakness.

Faculty and Resident-Care staff members are expected to promote positive relationships, encourage friendships across cultural and national boundaries, and address inappropriate language or behavior before it becomes an established pattern. Small acts of exclusion, ridicule, or intimidation should not be ignored simply because they appear minor in isolation.

The school will seek to reduce opportunities for bullying by:

- maintaining appropriate supervision in academic and residential settings;
- promoting respectful behavior through classroom instruction and residential life;
- encouraging responsible digital citizenship;
- supporting student leadership and positive peer relationships;
- recognizing students who demonstrate kindness, responsibility, and inclusion;
- responding promptly to concerns; and
- reviewing incidents to identify recurring patterns or situations requiring additional attention.

Students should understand that they share responsibility for the character of the community. Standing by silently, encouraging harmful behavior, forwarding humiliating material, or treating bullying as entertainment undermines the values of AIS-Salzburg.

### **13. Confidentiality, Records, and Protection from Retaliation**

Concerns involving bullying will be handled sensitively and with appropriate respect for the privacy of everyone involved. Information will be shared only with those who require it for safeguarding, investigation, student support, decision-making, legal compliance, or the effective operation of the school.

Complete confidentiality cannot be guaranteed. Information may need to be shared where:

- a student or another person may be at risk;
- the school must investigate a concern fairly;
- parents or guardians should be informed;
- another person must be given an opportunity to respond;
- consultation with external professionals or authorities is necessary; or
- disclosure is required by law.

Employees should explain these limitations before discussing confidential concerns whenever reasonably possible. Records should be factual, objective, dated, and securely maintained in accordance with the school's Data Protection and Information Governance Policy.

Retaliation against any person who raises a concern, supports another student, provides information, acts as a witness, or participates in the school's response is prohibited. Retaliation is itself a serious disciplinary matter and will be addressed separately from the original concern.

A report made honestly and in good faith will not become a disciplinary matter simply because the concern cannot ultimately be substantiated.

### **14. Working with Parents and Guardians**

AIS-Salzburg recognizes that parents and guardians are essential partners in promoting student well-being and maintaining a safe community. Parents and guardians are encouraged to contact the school promptly if they believe their child is experiencing bullying or may have engaged in bullying behavior. Early communication often allows concerns to be resolved before they become more serious.

The school asks parents and guardians to:

- encourage their child to speak honestly about concerns;
- avoid confronting another student or family directly regarding allegations of bullying;
- preserve relevant messages, screenshots, photographs, or other evidence where appropriate;
- support agreed plans developed by the school; and
- communicate respectfully with employees throughout the process.

The school will keep parents and guardians appropriately informed while respecting the privacy rights of other students and employees. Information concerning disciplinary action involving another student cannot normally be shared.

Differences of opinion may occasionally arise regarding how a matter should be resolved. The school will listen carefully to parental concerns, explain the reasons for its decisions, and seek constructive cooperation whenever possible.

## **15. Training, Monitoring, and Review**

Preventing bullying depends upon the daily conduct of employees as much as upon written policy.

Faculty, Resident-Care staff members, administrators, and other employees will receive appropriate guidance and training concerning bullying prevention, student well-being, safeguarding responsibilities, reporting procedures, documentation, and the appropriate use of professional judgment.

The administration will periodically review reported concerns, outcomes, and patterns to determine whether additional supervision, educational initiatives, or changes to procedures are needed. Particular attention will be given to recurring concerns involving residence floors, activities, online communication, friendship groups, or other areas in which students spend significant time together.

Because AIS-Salzburg is a small community, monitoring will be proportionate and respectful of privacy. The purpose is not to identify or categorize students but to recognize patterns early and improve the school's ability to prevent future concerns.

This policy will be reviewed annually and may also be revised following significant changes in law, safeguarding guidance, school procedures, or experience gained through the handling of particular cases.

## **16. Related Policies**

This policy should be read together with the following school documents:

- Child Protection Policy and Procedures
- Student Life Handbook
- Academic Program Handbook
- Faculty Handbook
- Resident-Care Staff Handbook
- Equality, Diversity, and Inclusion Policy
- Data Protection and Information Governance Policy
- Emergency Procedures Manual

Where another school policy establishes more specific safeguarding, disciplinary, employment, or legal requirements, that policy should be followed together with this policy.

Questions concerning the interpretation or application of this policy should be referred to the Headmaster.

## **Austrian Legal Context**

AIS-Salzburg operates as an Austrian private secondary boarding school and implements this policy in accordance with applicable Austrian law and its duty of care toward students and employees.

The legal framework relevant to bullying, cyberbullying, harassment, discrimination, student welfare, and safeguarding includes, where applicable:

- the Austrian Civil Code (*Allgemeines Bürgerliches Gesetzbuch – ABGB*);
- the Austrian Criminal Code (*Strafgesetzbuch – StGB*);
- the Austrian Private Schools Act (*Privatschulgesetz*);
- the Austrian School Education Act (*Schulunterrichtsgesetz – SchUG*), where applicable;
- the Austrian Equal Treatment Act (*Gleichbehandlungsgesetz – GlBG*);
- the Austrian Federal Disability Equality Act (*Bundes-Behindertengleichstellungsgesetz – BGStG*), where applicable;

- the Salzburg Child and Youth Services Act (*Salzburger Kinder- und Jugendhilfegesetz*);
- applicable Austrian data protection legislation, including the General Data Protection Regulation (GDPR); and
- other applicable Austrian federal and provincial laws and regulations.

Conduct involving assault, threats, coercion, stalking, sexual misconduct, unlawful disclosure of personal information, discrimination, or other criminal or civil wrongdoing may also be subject to investigation or action by the appropriate Austrian authorities.

Nothing in this policy limits the school's ability to take disciplinary or safeguarding action where conduct falls below the threshold of unlawful behavior but is nevertheless inconsistent with the school's mission, community standards, or duty of care.

This policy will be interpreted and applied consistently with applicable Austrian law. Where legal requirements change, the policy shall be interpreted accordingly until formally revised.

# AIS-Salzburg Bullying and Cyberbullying Response Guide for Employees

**If you witness, receive a report of, or reasonably suspect bullying:**

## **1. Protect**

- ☐ Stay calm.
- ☐ Ensure that the student is safe.
- ☐ Separate students if necessary.
- ☐ Do not leave a distressed student alone if immediate support is needed.
- ☐ If there is any immediate risk of harm, contact the Headmaster or Dean of Students immediately.

## **2. Listen**

- ☐ Listen carefully and respectfully.
- ☐ Take the concern seriously.
- ☐ Allow the student to explain in their own words.
- ☐ Ask only enough questions to understand what happened and whether anyone is currently at risk.
- ☐ Do not promise complete confidentiality.
- ☐ Do not express opinions or make judgments.

## **3. Record**

Record facts—not assumptions.

Include, where possible:

- ☐ date and time
- ☐ location
- ☐ students involved
- ☐ witnesses
- ☐ exactly what was reported or observed
- ☐ any injuries or immediate concerns
- ☐ screenshots, photographs, messages, or other available evidence

Record observations objectively. Avoid speculation or conclusions.

## **4. Report**

Report concerns promptly to: The Dean of Students or the Headmaster

If the concern also involves possible abuse, sexual misconduct, self-harm, or significant student welfare concerns, follow ***Child Protection Policy*** procedures immediately.

Do not assume someone else has already reported the concern.

## **5. Continue Supporting the Student**

While the matter is being addressed:

- ☐ remain approachable
- ☐ continue normal supervision
- ☐ watch for retaliation
- ☐ report any further incidents immediately
- ☐ maintain confidentiality

## **Do Not**

- ✗ investigate the matter yourself
- ✗ interview numerous students
- ✗ require students to confront one another
- ✗ promise a particular outcome
- ✗ discuss the matter with uninvolved students or parents
- ✗ minimize concerns as "just teasing" or "normal boarding-school behavior"
- ✗ attempt mediation without administrative approval

**Remember**

Not every disagreement is bullying.

A single serious incident may still require immediate action.

Early intervention usually prevents larger problems.

Students often disclose concerns first to the adult they trust—not necessarily an administrator.

Your responsibility is to: **Protect → Listen → Record → Report → Continue to Support**

**Questions to Consider**

Before leaving the situation, ask yourself:

- ☐ Is everyone currently safe?
- ☐ Does this require immediate safeguarding action?
- ☐ Have I listened carefully without judging?
- ☐ Have I recorded the facts objectively?
- ☐ Have I reported the concern?
- ☐ Does the student know who will help next?
- ☐ Do I need to continue monitoring this situation?

**Remember:**

At AIS-Salzburg, every employee shares responsibility for maintaining a boarding community in which students feel safe, respected, included, and supported. You are not expected to resolve every situation yourself, but you are expected to notice concerns, respond promptly, and ensure that the appropriate people are informed.