

# **Anti-Bullying Procedure**

#### 1. BACKGROUND

These procedures reflect St Piers School and College belief that all the children and adults with care and support needs have the right to feel safe and live free from harm within their respective learning and living environments.

We believe that all bullying is unacceptable, and that action must be taken to prevent bullying from occurring. We want our students to feel confident to speak out and seek support from staff should they feel unsafe.

We recognise that bullying exists in many forms, that it can happen at any age, that victims and witnesses may stay silent, and that everyone needs to be alert to the manifestations of bullying and the personal harm it can cause.

Bullying may occur in any situation not just within the school or college or residential settings and our students may require education in relation to personal safety and how to make a complaint about incidents which may occur in or outside of the organisation. We know that bullying can impact on their achievement, attendance and wellbeing.

There are several pieces of legislation which set out measures and actions for schools in response to bullying, as well as criminal and civil law. These include (but are not limited to):

- The Education and Inspection Act 2006, 2011
- The Equality Act 2010
- The Children Act 1989
- Protection from Harassment Act 1997
- The Malicious Communications Act 1988
- Public Order Act 1986
- Preventing and tackling bullying DfE (2018)
- Keeping Children Safe in Education (DfE 2025)
- Mental health and wellbeing provision in schools DfE (2018)

When working with the children and adults with care and support needs, it is necessary to be particularly sensitive and aware of two specific areas:

#### **Perceptions / Self Perception**

Young people with atypical social communication (e.g., ASC) will often present in a manner that can be egocentric and demanding. This may be manifested in a way that other young people perceive as bullying, especially if they have similar needs themselves. Although such behaviour in itself may be inappropriate and require support it does not necessarily reflect intent to cause 'harm.' This is not to say that such actions are not possible and not interpreted as harmful. Staff need to be vigilant in their analysis of events and discuss any such incidents to identify the appropriate course of action.

#### **Historical bullying**

Some students at St Piers School and College have experienced bullying in previous settings. Staff should be aware of this background and be sensitive to the increased anxiety that may accompany a new placement. These students may be especially alert to perceived threats or exclusion, and some may anticipate becoming a victim again. Understanding this history is essential to supporting their emotional wellbeing and helping them feel safe and included.



#### 2. SCOPE

The scope of this procedure is how we prevent and respond to the following:

- bullying of students at St Piers School and College (in all services)
- bullying of students outside of St Piers School and College when we are aware of it
- bullying of students by staff within or outside of St Piers School and College.

For concerns of bullying between staff, the Employee Protection Procedure should be followed, and staff should speak to their line manager in the first instance or HR.

#### 3. ROLES AND RESPONSIBILITIES

The following is a list of roles within this organisation who have responsibilities associated with this procedure.

**Head of Safeguarding and Quality Practice** – responsible for ensuring all incidents of bullying are appropriately recorded as per the Child and Adult Protection and Safeguarding Procedures and reported to the Trust Board and EGB.

**Anti-bullying Champions** – Whilst the Lead DSL takes an overview on any reported bullying incidents there are also allocated champions across both St Piers School (Danny Hulme) and St Piers College (Lisa Bush).

The champions help to:

- coordinate strategies for preventing bullying and links to PSHE learning
- implement this procedure
- manage bullying incidents
- support staff with managing student relationships
- take the lead on Anti-bullying week supported by the Lead DSL.

**All staff** – have a duty to understand and implement this procedure and take action to prevent bullying between students and to report any concerns of bullying.

**Trust Board and Education Governing Body (EGB)** – monitoring incidents of bullying, analysing trends, monitoring the effectiveness of this procedure and ensuring policy and procedures are in line with statutory guidance.

### 4. WHAT IS BULLYING?

#### 4.1 Definition

- The Anti-Bullying alliance define this as the 'repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power. Bullying can be physical, verbal or psychological. It can happen face-to-face or online'.
- There are four key elements to this definition:
  - hurtful
  - repetition
  - power imbalance
  - intentional.



- Bullying can include name calling, taunting, mocking, making offensive comments; kicking; hitting; taking belongings; producing offensive graffiti; gossiping; excluding people from groups and spreading hurtful and untruthful rumours.
- This includes the same unacceptable behaviours expressed online, sometimes called online or cyberbullying. This can include sending offensive, upsetting and inappropriate messages by phone, text, instant messenger, through gaming, websites, social media sites and apps, and sending offensive or degrading photos or videos.
- Prejudice, or identity, based bullying targets children and young people because of who they are or who they are perceived to be. This can be on the grounds of age, disability, gender (including gender identity), race, membership of the travelling community, religion or belief and sexual orientation. Children and young people can also be bullied for being perceived to belong to one or more of these groups, or for being associated with a member of one or more of these groups. It includes Racist and Homophobic Bullying. Often, this type of bullying is severe and can open the door to hate crimes.
- Bullying at St Piers School is recognised by us as being a form of child-on-child abuse. It can be
  emotionally abusive and can cause severe and adverse effects on children's and young people's
  emotional development.

#### **Distinguishing Bullying from Other Behaviour**

Bullying differs from teasing, friendship fallouts, or other types of conflict in several keyways:

- **Deliberate intent** bullying involves a clear intention to cause physical or emotional harm, distress, or humiliation.
- **Power imbalance** the person targeted is at a disadvantage, making it difficult for them to defend themselves (e.g., due to physical size, social influence, cognitive ability or peer group dynamics).
- Persistence bullying is often repeated or sustained over time, rather than being a one-off disagreement.

#### In contrast:

- Friendship fallouts are usually accidental or situational, without an ongoing power imbalance.
- They often involve feelings of remorse from one or both parties, and a willingness to repair and restore the relationship quickly.

Staff should apply these distinctions carefully when assessing incidents, recognising that for some students social misunderstandings may resemble bullying but may not carry intent, persistence, or power imbalance.

Occasionally an incident may be deemed to be bullying even if the behaviour has not been repeated or persistent – if it fulfils all other descriptions of bullying. This possibility should be considered, particularly in cases of sexual, sexist, racist or homophobic bullying and when children and young people with disabilities are involved. If the victim might be in danger, then intervention is urgently required, and the Safeguarding Team must be consulted.

Particular groups of children and young adults are more at risk of bullying due to real or perceived vulnerabilities such as disability, being a young carer, children who are Looked After, those from ethnic and racial minority groups, those perceived as being lesbian, gay, bi-sexual, transgender or questioning their sexual identity or gender (LGBTQ+). Staff are aware that a young person who is perceived by other young people to be LGBTQ+ (whether they are or not) is just as vulnerable as those who identify as LGBTQ+.



Some people are more vulnerable to engaging in bullying behaviour because of their family background, social deprivation, traumatic events, experiencing domestic abuse, low self-esteem, being isolated, being jealous, attention seeking, not understanding others' views and feelings and not being able to manage their own feelings in an appropriate way.

#### 4.2 What does bullying look like?

Bullying can be **direct** – usually face to face or via phone/mobile device with the victim or **indirectly** with the bully systematically undermining the victim's reputation by spreading rumours and malicious gossip with the intent of ruining the victim's social standing.

Bullying generally takes one of the following forms: (however this list is not exhaustive)

Emotional	Causing psychological harm through behaviours such as intimidation, humiliation, manipulation, exclusion, or persistent ignoring to make someone feel worthless or isolated.	
Physical	Involves hurting a person's body or belongings, such as hitting, kicking, pushing, tripping, or damaging possessions.	
Sexual	Behaviour of a sexual nature that is unwelcome and causes distress, including sexual comments, gestures, rumours, inappropriate touching, pressure to share sexual images, or circulating sexual material without consent	
Racist or Faith- Based	Bullying motivated by race, ethnicity, nationality, culture, or religion, including use of racial or faith-based slurs, insults, or exclusion.	
Verbal	Includes name-calling, insults, threats, intimidation, teasing, or mocking with the intent to harm.	
Homophobic / Biphobic and Transphobic (HBT)	Targeting someone because of their actual or perceived sexual orientation or gender identity through slurs, exclusion, threats, or stereotypes.	
Cyber	Bullying through digital platforms, including sending threatening or hurtful messages, sharing private information or images without consent, impersonation, or online exclusion.	
Social/Relational	to damage someone's social relationships or reputation, such as sion from groups, spreading rumours, public humiliation, or encouraging s to reject someone.	
Disablist	Bullying targeting a person because of a disability, special educational need, or medical condition, including mocking, exclusion, or assumptions about ability.	

Following consultation with the student council; student's views regarding bullying have also been incorporated below.

Bullying can include:

- Name calling
- Saying or writing mean things
- Being mean and nasty
- Taunting
- Mocking
- Making offensive comments



- Physical assault
- Taking or damaging belongings
- Gossiping and spreading hurtful and untruthful rumours
- Leaving people out of games
- People blocking your way
- Being disrespectful
- Using rude words that can make people sad
- Biting people
- Getting angry
- Threatening body language.

Although bullying can occur between individuals it can often take place in the presence (virtually or physically) of others who can become 'bystanders' or 'accessories'.

*Hate crimes* are closely linked to bullying. This is when a crime is committed against you because of your age, colour, race, sex, religion, nationality, sexual identity or disability.

There is no hierarchy of bullying – all forms should be taken equally seriously and dealt with appropriately.

#### Signs which may raise concerns about the possible bullying of a student:

A child or young person may indicate they are being bullied either through direct disclosure or changes in behaviour or signs. Staff should be vigilant and monitor closely if a student:

- Is frightened of going to a particular place or group (e.g., school, college, house, youth club) and reluctant to talk about it.
- Becomes withdrawn, anxious, lacks confidence, starts stammering, cries themselves to sleep, or experiences nightmares.
- Appears wary or fearful around an individual or group of people.
- Attempts or threatens suicide or runs away from home or school.
- Frequently feels ill in the morning or develops unexplained physical symptoms.
- Experiences a decline in academic performance or interest in schoolwork.
- Has possessions that are damaged, go missing, or are repeatedly 'lost'.
- Asks for money or steals money (possibly to pay a bully) or repeatedly loses money.
- Exhibits sudden aggressive, disruptive, or unreasonable behaviour.
- Begins bullying other students.
- Develops an eating disorder or refuses to eat.
- Is afraid or reluctant to say what is wrong when asked.
- Provides improbable excuses for any of the above behaviours or signs.
- Shows fear or anxiety about using the internet or mobile phone, appears nervous or jumpy when receiving messages, or is disturbed after being online.

It is clear that these signs and behaviours could indicate other problems, but bullying should be considered as a possibility.



#### **Considerations Regarding Intent and Perception**

It is recognised that some students' behaviour may be experienced as bullying by others, even if the behaviour was not intended as such due to the student's level of functioning or awareness. However, regardless of intent, there is still a victim, and protective measures must be put in place to support those affected.

Play fighting is not considered acceptable play behaviour at St Piers and is actively discouraged. Sometimes students may struggle to regulate their behaviour, and what begins as play can quickly escalate into a child-on-child or peer-on-peer safeguarding incident.

Staff should remain vigilant and aware that while some behaviours may not be perceived as bullying by the student exhibiting them, what matters most is how the student experiencing the behaviour feels. The feelings and wellbeing of the targeted student are paramount.

Within all our services staff will help children and adults to:

- 1. Increase awareness of different types of bullying.
- 2. Help them to develop strategies to combat all types of bullying.
- 3. Ensure that they know how to report bullying.
- 4. Encourage them to develop positive values and attitudes such as tolerance, kindness and respect.
- 5. Use discussion and role play to explore issues related to bullying and to give individual children and young people confidence to deal with 'bullying'.
- 6. Use proactive systems and procedures which promote an inclusive, supportive ethos and positive relationships whereby differences are acknowledged and celebrated.
- 7. Use restorative justice practice to create a culture for all student based on social responsibility.

The above will be taught within education services as well as consolidated in residential student meetings and individual keyworker sessions.

#### 4.3 Cyberbullying

Cyberbullying refers to the use of technology to intimidate, threaten, or harm others. It can take many forms, including but not limited to:

- Sending threatening, abusive, or harassing emails or messages.
- Misuse of blogs, social media platforms, gaming websites, online forums, and chat rooms.
- Harmful or inappropriate use of instant messaging services.
- Sending threatening or malicious text messages or making harassing phone calls.
- Misuse of digital devices or associated technology, including cameras and video functions, to embarrass, humiliate, or harm others.

Cyberbullying can occur at any time of day, can involve a wide audience, and can leave a lasting digital footprint. Staff should treat it with the same seriousness as face-to-face bullying.

#### **How to Stay Safe and Avoid Cyberbullying**

- Be careful who you give your phone number and email address to. Only share these with people you trust.
- Do not leave your mobile phone unattended. Keep it with you or in a safe place at all times.



- Never lend your phone to anyone.
- Be cautious about the personal information you share on social media sites like Facebook.
   Always use privacy settings to control who can see your details. Remember, you must be at least 13 years old to join most social networks.
- Remember that people online are not always who they say they are. Someone claiming to be your age might actually be much older, and meeting strangers from the internet can be very dangerous.
- Never agree to meet someone you have only met online without telling your parents or a trusted adult who can accompany you. Always put your safety first.
- If you receive abusive messages, do not reply. Instead, save or screenshot them as evidence.
- Regularly check your online profiles and remove any personal information that could give away too much about you.
- Block or remove anyone from your friends or contacts if you suspect they are bullying you.
- Never send photos or videos of yourself, especially intimate ones, to others. Once shared, you lose control over them.

#### Please also refer to our Online Safety procedure

#### 4.4 Sexual Bullying

Sexual bullying can occur in person or online and may include, but is not limited to:

- Abusive or sexualised name-calling and insults including the use of homophobic, biphobic, or transphobic language, and spreading sexual rumours about someone in person or via digital platforms.
- Unwelcome comments or looks about appearance making remarks about someone's body, clothing, or looks, either directly or behind their back.
- Inappropriate and uninvited physical contact without consent including touching, groping, or any physical behaviour of a sexual nature. This also includes pressuring someone to engage in sexual activity through emotional manipulation (e.g., "If you loved me..."), comparing previous encounters, or other coercive tactics.
- Pressure to participate in sexting such as demanding sexual images, using threats or emotional blackmail (e.g., threatening to end a relationship), or sharing sexual images without the person's consent.
- Persistent and unwelcome sexual innuendo verbal or written remarks of a sexual nature intended to intimidate, humiliate, or degrade.
- Sexism and gender stereotyping including derogatory assumptions or restrictions based on someone's gender.
- Sexualised graffiti or materials creating, displaying, or circulating sexual content such as pornography, sexual cartoons, or clothing/badges with explicit sexual messages or imagery.
- Serious sexual offences in the most extreme form, this may include sexual assault or rape, which are criminal offences and must be reported to the police.

Please also refer to Responding to Harmful Sexual Behaviour, Sexual Harassment and Violence



#### 4.4 Homophobic Bullying

Homophobic bullying occurs when a person is targeted because of their actual or perceived sexual orientation. This may include assumptions based on their appearance, behaviour, physical traits, friendship groups, or associations with lesbian, gay, bisexual, transgender, queer/questioning (LGBTQ+) individuals. In some cases, the bullying may simply arise from being perceived as 'different'.

Homophobic bullying can take many forms, including but not limited to:

- Verbal abuse name-calling, use of homophobic slurs, or derogatory comments.
- Spreading rumours in person or online, about someone's sexuality or relationships.
- Cyberbullying using digital platforms to intimidate, harass, or humiliate.
- Physical abuse hitting, pushing, or other forms of physical aggression.
- Sexual harassment or assault unwanted sexualised behaviour linked to assumptions about someone's sexuality.
- Emotional abuse isolating, excluding, or persistently targeting someone to cause distress.

#### 5. PROCEDURES

#### 5.1 For the student experiencing the bullying

Immediately ensure the safety of the targeted student and provide reassurance and support. Actions may include:

- Listening to their concerns give the student time to talk, listen actively, and avoid making judgements about them or the situation they describe.
- Increasing supervision ensure greater staff presence in areas where the student feels unsafe.
- Separating the students involved to prevent further incidents and reduce distress.
- Making alternative arrangements adjust supervision, location, class groupings, or other management measures for either student on a short-term or long-term basis, as needed.

Where appropriate, staff should:

- Agree next steps and planned actions with the targeted student.
- Record the student's views in the incident report wherever possible.
- Ensure the student is comfortable with the safety measures in place and confident that action will be taken to address the bullying.



#### 5.2 For the student who engages in bullying behaviour

Where appropriate (e.g., when the student has the capacity to understand their actions and the consequences), the student should be asked to apologise to the targeted student. Reconciliation should be attempted only if the targeted student agrees and is appropriately supported.

It is important to recognise that a student who engages in bullying behaviour may themselves be experiencing negative or distressing circumstances. Any safeguarding concerns must be identified and addressed in line with policy.

A restorative justice approach may be used with individuals or groups to:

- Explore the impact of harmful actions.
- Promote empathy and understanding.
- Reinforce social responsibility.
- Support students to make amends to those affected.

#### 5.3 Reporting bullying concerns

All incidents of bullying must be taken seriously and reported immediately to the Safeguarding Team. Students can report bullying to staff or directly to a DSL. Parents can also raise concerns of bullying to staff or directly to the Head of Safeguarding and Quality Practice.

All incidents of bullying must be recorded by staff on MyConcern<sup>®</sup>. The Lead DSL will consider whether to contact safeguarding partners or external agencies and will advise staff accordingly. Records of incidents and any subsequent actions must be kept in line with safeguarding and data protection requirements.

In addition, the Trust Board and EGB will:

- Monitor incidents of bullying to ensure they are addressed effectively.
- Identify trends and patterns in order to inform preventative work.

Some forms of bullying are criminal offences and must be reported to the Police.

#### These include:

- Violence or assault.
- Theft.
- Repeated harassment or intimidation for example, name-calling, threats, and abusive phone calls, emails, or text messages.
- Hate crimes including offences motivated by race, religion, sexual orientation, disability, or gender identity.

Depending on the nature and severity of the incident, additional responses may include:

- Referral to other professionals such as the Psychology Team.
- Investigating the concerns gathering information from all parties involved.
- Supporting all students and staff affected including debrief sessions.



- Solution-focused and restorative approaches to repair relationships and prevent recurrence.
- Individual education or interventions with the targeted student and/or the student engaging
  in bullying behaviour.
- Depending on the severity of the bullying, further actions may include warnings, detention, suspension, or expulsion for students.

In any unresolved cases St Piers School and College accepts that parents or students might wish to use the complaints procedure and, if still dissatisfied, they may choose to involve external agencies. Information will be given to students and parents in such cases, about the Complaints Procedure.

#### 5.4 Bullying of students by staff

Where there are concerns that a staff member is bullying a student, this must be reported as a safeguarding concern. Such matters will be taken very seriously, are likely to be reported to the police and Surrey MASH/LADO. Staff members involved in bullying may face disciplinary action in accordance with employment policies.

## 6. Related Procedures

This procedure also links to our:

- Child and Adult Protection and Safeguarding Policy and Procedure
- Comments, Compliments and Complaints Policy and Procedure
- Confidentiality Policy
- Inclusivity, Equality and Diversity Policy
- Curriculum Statement
- Relationships and Sexual Wellbeing Policy and Procedure
- Code of Conduct
- Behaviour policy.

# **Useful Links and Supporting Organisations General Anti-Bullying**

- Anti-Bullying Alliance: https://www.anti-bullyingalliance.org.uk
- Childline: <a href="https://www.childline.org.uk">https://www.childline.org.uk</a>
- Family Lives: <a href="https://www.familylives.org.uk">https://www.familylives.org.uk</a>
- Kidscape: https://www.kidscape.org.uk
- MindEd: https://www.minded.org.uk
- NSPCC: <a href="https://www.nspcc.org.uk">https://www.nspcc.org.uk</a>
- The BIG Award: https://www.bullyinginterventiongroup.co.uk
- PSHE Association: https://www.pshe-association.org.uk
- Restorative Justice Council: https://www.restorativejustice.org.uk
- The Diana Award: https://www.diana-award.org.uk
- Victim Support: https://www.victimsupport.org.uk
- Young Minds: <a href="https://www.youngminds.org.uk">https://www.youngminds.org.uk</a>
- Young Carers: https://www.youngcarers.net



# SEND (Special Educational Needs and Disabilities)

- Changing Faces: <a href="https://www.changingfaces.org.uk">https://www.changingfaces.org.uk</a>
- Mencap: <a href="https://www.mencap.org.uk">https://www.mencap.org.uk</a>
- Anti-Bullying Alliance Cyberbullying & SEND Module: <a href="https://www.cafamily.org.uk/media/750755/cyberbullying\_and\_send">https://www.cafamily.org.uk/media/750755/cyberbullying\_and\_send</a> – module final.pdf
- DfE SEND Code of Practice: <a href="https://www.gov.uk/government/publications/send-code-of-practice-0-to-25">https://www.gov.uk/government/publications/send-code-of-practice-0-to-25</a>

#### Cyberbullying

- Childnet: <a href="https://www.childnet.com">https://www.childnet.com</a>
- Internet Watch Foundation: https://www.iwf.org.uk
- Think U Know: https://www.thinkuknow.co.uk
- UK Safer Internet Centre: https://www.saferinternet.org.uk
- UK Council for Child Internet Safety (UKCCIS): <a href="https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis">https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis</a>
- DfE Cyberbullying Guidance for Schools: <a href="https://www.gov.uk/government/publications/preventing-and-tackling-bullying">https://www.gov.uk/government/publications/preventing-and-tackling-bullying</a>
- DfE Advice for Parents and Carers on Cyberbullying: https://www.gov.uk/government/publications/preventing-and-tackling-bullying

#### Race, Religion, and Nationality

- Anne Frank Trust: https://www.annefrank.org.uk
- Kick it Out: <a href="https://www.kickitout.org">https://www.kickitout.org</a>
- Report it: <a href="https://www.report-it.org.uk">https://www.report-it.org.uk</a>
- Stop Hate: https://www.stophateuk.org
- Tell Mama: https://www.tellmamauk.org
- Educate Against Hate: <a href="https://www.educateagainsthate.com">https://www.educateagainsthate.com</a>
- Show Racism the Red Card: https://www.srtrc.org/educational

#### **LGBTQ+ Support**

- Barnardo's LGBT+ Hub: https://www.barnardos.org.uk/what we do/our work/lgbtq.htm
- Metro Charity: <a href="https://www.metrocentreonline.org">https://www.metrocentreonline.org</a>
- EACH: https://www.eachaction.org.uk
- Proud Trust: https://www.theproudtrust.org
- Schools Out: https://www.schools-out.org.uk
- Stonewall: https://www.stonewall.org.uk

#### **Sexual Harassment and Sexual Bullying**

- Ending Violence Against Women and Girls (EVAW): https://www.endviolenceagainstwomen.org.uk
- EVAW Guide for Schools:
  - https://www.endviolenceagainstwomen.org.uk/data/files/resources/71/EVAW-Coalition-Schools-Guide.pdf
- Disrespect No Body Campaign: <a href="https://www.gov.uk/government/publications/disrespect-nobody-campaign-posters">https://www.gov.uk/government/publications/disrespect-nobody-campaign-posters</a>
- Anti-Bullying Alliance Sexual Bullying Info: <a href="https://www.anti-bullyingalliance.org.uk/tools-information/all-about-bullying/sexual-and-gender-related/preventing-and-responding-sexual-and-gender-related/preventing-and-gender-related/preventing-and-gender-related/preventing-and-gender-g



• Anti-Bullying Alliance Sexual Bullying Guidance for Staff: <a href="https://www.anti-bullyingalliance.org.uk/tools-information/all-about-bullying/sexual-and-gender-related">https://www.anti-bullyingalliance.org.uk/tools-information/all-about-bullying/sexual-and-gender-related</a>

#### **Additional Resources**

 Department for Education: Preventing and Tackling Bullying (July 2017): https://www.gov.uk/government/publications/preventing-and-tackling-bullying



This procedure is agreed by the Executive Principal and will be implemented by all departments.				
Signed:	Jeramy	Date: 01 September 2025		
Executive Principal		Date of next review: 01 September 2026		

# Version table

**Creation: - Gill Walters** 

Approved by: - Executive Principal

Approved by: - Executive i inicipal					
Version No.	Date of changes	Reason for change	Changes made by		
1.2	30 Aug 2022	General review/minor amendments in line with KSCIE 2022	Gill Walters		
1.3	11 Aug 2023	Annual Review/ minor amendments in line with KSCIE 2023	Gill Walters		
1.4	08 Aug 2023	Annual Review- clarification that this procedure relates to students at St Piers	Gill Walters		
1.5	11 Aug 2025	Annual Review 4.2 - update on definitions/inclusive of cyberbullying & addition of Considerations Regarding Intent and Perception	Gill Walters		