



# Submission on the Anti-Bullying Rapid Review

---

June 2025



251 Morphett Street, Adelaide, SA 5000

08 8226 3355 | [commissionercyp@sa.gov.au](mailto:commissionercyp@sa.gov.au)

## Introduction

Thank you for the opportunity to provide feedback for the Anti-Bullying Rapid Review. As the Acting Commissioner for Children and Young People, my mandate is to advocate at a systemic level for the rights, interests and wellbeing of all children and young people in South Australia. This has been drawn from not only my own experience, but from the wealth of experiences shared with me by children and young people as detailed in the many reports, submissions and papers produced by the inaugural Commissioner over eight years.

This submission brings together all the reports, submissions, guidance papers and other materials that were produced by the inaugural Commissioner Helen Connolly, and what has occurred in South Australia since the publication of her 2018 report: [The Bullying Project](#). This report brought the views of children and young people to the centre of the debate around bullying. The report asked that decision and policy makers include children and young people as active participants to be part of the solution. It also called for a framework that went beyond schools and involved the collaboration of governments, organisations, schools, parents and importantly children and young people, who can work together to build best practices for responding to and preventing bullying.

Out of this a statewide strategy was released in 2019: [Connected: A Community Approach to Bullying Prevention within the Schools Gates and Beyond](#). From this, the Department for Education created new training materials, policies and guidance to better define bullying and to implement a non-punitive response to bullying which also involves student interventions. However, the actions beyond the school gates are a bit more haphazard.

In April 2024, the Department for Education released the Key Achievements Report in relation to the statewide bullying prevention strategy.<sup>1</sup> The final evaluation report found:

- Increased staff awareness, understanding and confidence around bullying behaviours
- High uptake in the use of the online policy tool, but a low completion rate of schools developing a local bullying prevention policy.
- The public-facing bullying website associated with the strategy is not as effective as had been hoped.

- A slight reduction in self-reporting of bullying by students has occurred over the life of the Strategy, but bullying remains high with over 50% of students annually reporting having experienced regular bullying during the school year.<sup>ii</sup>

Data from the non-government sector was not made available for this evaluation.

We have also seen a conflation of issues in recent years: On one level, violence and bullying is often used in the same sentence, whilst on the other hand, teasing is now often considered bullying. The public are not clear on where one behaviour leaves off and the other begins. We see that misinformation being agitated in the media that appears to have its own agenda on how children are perceived and what response the state should undertake. Often this response is reactionary and does not align with what works and makes our society safer.

The current discourse also does not address the behaviour of adults and how children and young people learn from adults. Children and young people who talked to the inaugural Commissioner said that it is often the concerning behaviours of parents, teachers, mentors and coaches in their lives that made them believe it was okay to behave the same. To address bullying and its associated behaviour, we need to look beyond the school gates and address the issues that are occurring in the wider community that perpetuate and reinforce bullying behaviour.

Children and young people can be impacted by bullying in many contexts, including at school, at work, during sport and other activities, in the community, at home, and online, and they are asking for:

- More anti-bullying programs and contemporary respectful relationships education in the school curriculum
- A focus on friendship
- Kindness
- More support for diversity
- More focus on wellbeing
- Address adult bullying behaviours
- Adults actively intervene in bullying
- Support all people involved in bullying

I hope that this submission assists in developing a consistent national standard for responding to bullying and its underlying causes. Not only in schools, but how behaviours outside of schools can influence behaviour.

### **The need for a nationally consistent definition of bullying**

It is important to define and identify what bullying entails in order to address it. Yet, at the same time, we need to be aware that other behaviours can also be harmful to children, indicating a need to focus on harm more broadly.<sup>iii</sup>

A national consistent definition for bullying should not only be for schools, but across systems; workplaces, sports clubs and other organisations. It should distil the elements of bullying, which include repeated behaviours which intend to cause harm, involves a power imbalance, can involve an individual or group, and can be physical, verbal or online behaviour.

### **Legal context**

Broadly speaking, there are no overarching laws criminalising bullying in South Australia. However, some aspects of behaviours, and some places where this occurs, are covered by laws, including criminal in relation to violent or online bullying<sup>iv</sup>. It is interesting to note that children and young people have less rights at school than in the workplace.

Workplace laws cover any form of bullying.<sup>v</sup> Students must complain about bullying at school through the school or department. If this is not successful, they have an avenue to seek a remedy under the Equal Opportunity Act if bullying is based on things like race, disability, and sexuality, while equal opportunity law covers sexual harassment – and that is only in relation to educators bullying students (not bullying between students).<sup>vi</sup>

This piecemeal approach could also be better addressed by the introduction of a state Human Rights Act as recommended by the SA Parliament's Social Development Committee. A South Australian Human Rights Act would see better protection of human rights for all people in the state by consolidating the piecemeal rights and protections that are scattered throughout different legislation into one comprehensive Act, which would also address many of the drivers behind bullying.

## CCYP work – What children and young people have told us

Bullying has been an issue that children and young people have raised with the Commissioner since the inaugural Commissioner’s Listening Tour in 2017. ‘Help stop bullying and cyberbullying’ was in the top 5 ‘one things’ the inaugural Commissioner should prioritise in her role to help make life better for children and young people in South Australia.

From the inaugural Commissioner’s work, it is clear that bullying can mean different things to children and young people, sometimes in-line with the formal definition and at other times related to being ‘mean’ or one-off incidents.

Discrimination-based bullying – or bullying based on differential power and privilege in relation to things like gender, sexuality, disability, culture, and so on – can particularly be an issue for children and young people.

Children and young people have shared their views on, and experiences of, bullying in many aspects of CCYP’s work. In particular:

- Listening Tour Reflections from 2017: [Listening-Tour-Reflections.pdf](#)
- Original major CCYP report on bullying: [The Bullying Project - Commissioner for Children and Young People](#)
- Key part of Advocacy Agenda: Many mentions of bullying, including sections on Bullying at school, Bullying at work, and Bullying in sport: [Advocacy-Agenda-for-SA-CYP.pdf](#)
- Keeping Our Promises – Promise #3: Reduce Bullying Behaviour at School [Keeping-Our-Promises-Report.pdf](#)
- Postcards: The Things That Matter reports (especially 4, 5, and 6: [The Things That Matter 4 | Views of 8-12 year olds on life, school and community](#), [The Things That Matter 5 - Commissioner for Children and Young People](#))
- School: [Seen-But-Not-Heard-Report.pdf](#)
- Especially school: [Teenagers-and-Safety-Report.pdf](#)
- Sport: [More-Than-a-Game-What-do-children-and-young-people-think-about-sport.pdf](#)
- Bullying as part of recommendations in these submissions:
  - [2022-12-Submission-to-the-Inquiry-into-School-Refusal\\_Final.pdf](#)
  - [2022-10-27-Submission-on-the-proposed-Code-of-Conduct-for-teachers.pdf](#)

- [2021-02-15-Final-Submission-re-draft-National-Childrens-Mental-Health-and-Wellbeing-Strategy-A7087462.pdf](#)
- [Submission-to-the-Review-of-the-National-School-Reform-Agreement.pdf](#)

In relation to discrimination-based bullying, CCYP has done the most on:

- Racism – [Everyday-Racism.pdf](#)
- LGBTQIA+/bullying based on gender and sexuality diversity – [No-Exceptions-Creating-Safer-Schools-for-LGBTQIA-Students.pdf](#) + [Screen-Child-Rights-Progress-Report-2024-ALL.pdf](#) Education
- Gender-based bullying – [Sexism-and-Stereotypes-in-Schools-The-views-and-opinions-of-SA-school-students.pdf](#)
- Disability – this is evident from CCYP’s work but more implicit in reports

### **Current position in South Australia**

In South Australia, bullying in relation to children and young people is often focused on school.

#### Department for Education

The Department for Education requires all government schools in the state to have a local bullying prevention policy.<sup>vii</sup> These local bullying prevention policies and procedures need to address specific types of bullying where it relates to discrimination, e.g. homophobic, biphobic, transphobic and interphobic bullying.<sup>viii</sup>

There is also Departmental behaviour support policy, which is the overarching departmental policy relating to bullying and covers schools, preschools, and children’s services<sup>ix</sup>. This is supported through training for early childhood leaders, school principals, teachers and support staff.

The Department for Education has released its Safe and Supported Learning Environments – Plan of Action 2024–2026.<sup>x</sup> This Plan was developed in 2023 to tackle violence and bullying behaviour in schools. It builds on previous actions to address bullying and also commits to:

- building students’ skills and knowledge to deal with bullying, providing support for their peers, and training other students through a students’ ‘train the trainer’ model
- providing educators and schools with training and new resources to better understand challenges faced by LGBTQIA+ students; and

- updating the department's bullying prevention requirements in schools using good practice examples from schools where there has been a reduction in bullying.<sup>xi</sup>

### Non-government schools

Catholic and independent schools in South Australia do not have any clear overarching strategies about bullying, although they would be required to comply with the National Principles of Child Safe Organisations and submit relevant policies and procedures to the Department for Human Services every five years.<sup>xii</sup>

Catholic Education South Australia states that 'every child has the right to be safe and free from all kinds of abuse, including bullying and harassment, and neglect'.<sup>xiii</sup> Duty of care documents have some mention of bullying, with the procedure document having a short section on sexual harassment and bullying.<sup>xiv</sup>

There's no clear information about bullying on the Association of Independent Schools South Australia website.<sup>xv</sup>

### **Why should bullying be addressed?**

Research studies over many years have shown the emotional, mental, and physical impacts of bullying on children and young people who are bullied. These impacts can be short, medium, and long term.

An AIHW review shows that children who are bullied are more likely to perform poorly academically, have difficulty adjusting to transitions (such as secondary school), are more likely to have mental health issues, and are at higher risk of suicide.<sup>xvi</sup> The review also highlights that bullying also impacts on the children and young people who are perpetrating the bullying, as well as bystanders. Children who are bullied are also likely to perpetrate bullying behaviours.

Bullying is a common occurrence amongst children and young people in South Australia. Measurements of bullying often relate to the school context.

Some children and young people are more likely to be bullied than others. This includes in relation to diversity, including, but not limited to gender, disability and culture.

The Department for Education's Wellbeing and Engagement Collection (WEC) survey includes questions on physical, verbal, social, and cyber bullying (although the questions asked of students do not fully meet the definition of bullying used by the department).

Overall, there has been a slight reduction in bullying experiences as reported by all South Australian government school students since 2019. Results from the 2024 WEC show:

- The proportion of all students reporting being bullied 'weekly' is stable at 19% in 2020 to 18% in 2024.
- A decrease in 'weekly' or 'monthly' verbal bullying (55% in 2020 to 50% in 2024), in physical bullying (36% in 2020 to 32% in 2024), cyberbullying (26% in 2020 to 22% in 2024) and social bullying (50% 2020 to 43% in 2024).
- Physical, verbal and social bullying become less frequent as students get older, whereas the frequency of cyberbullying remains relatively steady across year levels. Across all bullying types, 21% of Year 4 students reported being bullied 'weekly', compared to 16% of Year 10 students and 11% of Year 12 students.<sup>xvii</sup>

### **What SA children and young people say needs to happen to address bullying**

Children and young people have told the Commissioner many things need to happen to address bullying – both prevention and intervention.

While children and young people understand how difficult it can be to prevent bullying, they have ideas to inform bullying prevention strategies. They also want more action in relation to intervening in bullying.

#### More anti-bullying programs and contemporary respectful relationships education in the school curriculum

Children and young people want more education in relation to bullying and want to be more involved in anti-bullying programs. There is a real sense that current generations experience bullying in different ways to previous generations. They recommend that there are opportunities in schools and the community for children and young people to have an active role in leading and running anti-bullying programs. These programs should be practical, interesting and equip young people with skills so they can have difficult conversations.

Children and young people have said that in response to bullying that takes place at school, they require specialised assistance to learn practical skills that incorporate a range of peer-led intervention programs. This would enable them to challenge bullying behaviours that are being displayed by their friends.

South Australian children and young people have also expressed their frustration and concern that discussion about sexism, sexual assault and domestic violence are not currently a feature of their relationship and sexual health education at school. This leaves them feeling unsafe at school, at work, and socially, as well as within their intimate relationships.

#### More focus on friendship

Children and young people know that having friends can be both a protection against bullying and a support for someone who is being bullied. They want school to play more of a role in guiding children and young people on how to make friends. They want teachers to teach them how to be a good friend, and how to maintain good friendships, including providing opportunities to develop broad friendship networks while at school.

In addition, children and young people want to be taught how to have difficult conversations with their friends and understand how to support each other.

#### More kindness

Children and young people view being kind as a more effective strategy than exclusion or punishment. Participants explained that strategies based on kindness may be more effective than ignoring or punishing a bully. They have said that parents and teachers need to show kindness through their words, including kindness to the bullies.

They have also shared that kindness is something that needs to be taught and that kindness has power. Learning how to treat others with kindness, respect and acceptance is important in preventing bullying.

#### More support for diversity

Children and young people want more support of diversity – including in relation to gender, sexuality and culture – in all settings.

Students have said it is important that teachers call out sexism, gender-based teasing and bullying, and have open discussions with students about the impact and limitations of gender stereotypes and assumptions

In relation to the bullying of LGBTQIA+ students, in many cases, young people reflected on how schools and teachers failed to intervene and protect students from bullying. They

thought there was a lack of repercussions for bullying against LGBTQIA+ students. Some young people attributed this to a fear among school leadership that supporting LGBTQIA+ students would bring the school into 'disrepute'. Education and training for school staff was recommended by young people in the context of the need for more proactive bullying prevention.

Some LGBTQIA+ young people have reported being 'publicly outed' by teachers or other staff, which jeopardises their safety and increases the risk of bullying and rejection from peers or family.

Young people from refugee and migrant backgrounds want more discussions and education about racism at school from a young age. They want more action taken by teachers and schools when they are bullied and mocked by their peers and seek anti-racist strategies that involve student input, and which encourage active participation by all students. Young people reported that there are seldom any consequences for the perpetrators of racist bullying, and that it was usually the victims of bullying who received the harshest punishment.

Children and young people also talk about the need to challenge stereotypes and promote diversity in sporting contexts.

#### More focus on wellbeing

Children and young people want schools to check in on student wellbeing rather than the onus being on children to report bullying incidents.

There is a broad sense that student wellbeing is not being prioritised for children and young people, particularly in high school settings.

#### Address adult bullying behaviours

Adults often perpetrate bullying behaviours directly towards children and young people, including at school, in sporting contexts, at work, and in many other situations.

Children and young people want teachers and other adults to more proactively support and role-model positive and respectful relationships so they know what to model and how to behave in their own relationships. It is also more effective than punitive responses. Modelling respectful behaviour – not only in their relationships with students but also in their relationships with other teachers, school leaders, parents and carers, and

the wider community – is essential to changing behaviours, hearts and minds in the long-term.

Some young people have said they have peers who identify as gay and non-binary who they see being discriminated against and subjected to bullying at their school by other students as well as by teachers, and that they want to see this stopped. Children and young people also describe racist bullying from students, but also from teachers who not only make racist comments themselves but will ignore racist comments being made by other students

In sporting contexts, children and young people are clear that this bullying behaviour is perpetrated by adults, including parents, coaches, and teachers, as well as by other children and young people. They described how poor behaviour among adults can exacerbate, or at least excuse, poor behaviour among young people. Particularly when adults failed to intervene when they observed children or young people being bullied.

In work contexts, children and young people can experience bullying from managers, supervisors, and bosses, as well as co-workers. They want more actions on these directly, as well as the more proactive development of workplaces which are welcoming and safe with a friendly team environment.

#### Adults actively intervene in bullying

Children and young people want more adult intervention in bullying behaviour across different contexts.

In school contexts, children and young people want schools to have better systems for addressing bullying. Many children and young people report that what teachers and schools don't do can be just as powerful as what they do, particularly when teachers fail to intervene and protect students from bullying.

Children and young people are clear that anti-bullying policies need to name behaviours and identify words and language that is problematic. It should also describe how groups of students are more prone to experiencing negative attention and harm because of their gender, gender identity, gender expression, or sexual orientation. All school policies should be reviewed through a gender lens to ensure they are gender neutral including bullying policies, uniform policies, menstrual wellbeing policies, and sports policies.

Children and young people said they wanted teachers to be more supportive in their responses to bullying. They want teachers to intervene in bullying and not be bystanders and to listen and understand what is behind the bullying.

They want schools to call out bullying for what it is (racism, sexism, ableism, homophobia, transphobia, body-shaming, etc) and respond in age-appropriate and gender-sensitive ways without resorting to exclusionary responses. They recommend that teachers watch students more closely, looking out for low-lying bullying (which can often result in the bullied snapping and then being incorrectly labelled the bully) and ask if they are okay, rather than waiting for students to tell them there is a problem. They also want teachers to always take bullying seriously.

Children and young people want schools to understand differences in forms of bullying (physical, verbal, emotional) and what it is focused on (appearance, race, gender and sexuality, family, disability). Ideas suggested by students include training for all teaching and non-teaching staff so that they understand gender stereotypes, gender-bias, and gender-based bullying and harassment.

In sporting contexts, a key part of improving the culture and environments was to 'get on top of' and 'get rid of' bullying and toxic, disrespectful, or rude behaviour. Young people said that club leaders, coaches, and officials, play a key role in this and should be equipped to 'look for signs of disrespect and take action as soon as possible', including intervening where people 'hate, judge and bully'.

In addition to challenging sexist, homophobic, transphobic, or racist behaviour and stereotypes, young people said that actively promoting participation and celebrating diversity would make a significant positive difference to their participation in sport.

#### Support all people involved in bullying

Understanding the relationship between 'bully', 'bullied' and bystander can be interchangeable, meaning that effective responses to bullying should support all children and young people.

Children and young people felt that when bullying does happen there needs to be support available for everyone involved. They recommend that more counselling be made available for children and young people in primary and secondary school. Parents

need support too, so they can learn more about how to help their children if they are a victim or a bully or someone who wants to help.

### **Next steps**

Whole community level approaches are needed to address bullying. The SA government must include children and young people in any policy changes, especially at a school level, thereby empowering this group to address bullying.

In schools, this means whole school approaches are needed, focusing on preventing bullying by creating safe and welcoming school environments and intervening in bullying when it occurs. Children and young people need to be involved in the development of resources to better reflect the multiple forms of bullying being experienced by them in the school environment.

Children and young people also need to be involved in developing strategies that improve the wellbeing of children and young people more broadly, particularly those who are the most vulnerable.

Next steps include:

- Increased focus on kindness in young people's lives, including how these behaviours are taught to children and young people, and displayed by parents, teachers, sports coaches, and other adults
- Support schools to prevent and respond to bullying in ways that reflect children and young people's views and experiences. This includes:
  - o Involve children and young people in anti-bullying programs, including having an active role in leading and running these programs
  - o Increase the wellbeing of students in schools through a focus on the issues and ideas young people identify as important
  - o Have more of a focus on teaching skills to develop friendships in schools
  - o Increase possibilities for friendships and connections between students at school, including through things like lunchtime clubs and gaming in the library in primary schools and facilitated friendship circles and conversation clubs in secondary schools
  - o Increase teacher intervention in bullying, including always taking bullying seriously. This includes the need to support teachers in being able to do this

- Improve data collected on bullying, including in the WEC by being clear what is bullying and what is other forms of harm. This could also include the option to report ‘daily’ bullying
- Recognise and address the impact of bullying and discrimination, including in relation to racism, ableism, sexism, homophobia, and transphobia, in all settings including schools, sports, and community settings
- Increase support services for children and young people involved in bullying, including more counselling available at the primary and secondary school levels
- Increase support sources for parents to help their child if they are involved in bullying, whether as a target of bullying or a perpetrator

If you have any questions please do not hesitate to contact this office.

Yours sincerely,



**Mimi Crowe**

Acting Commissioner for Children and Young People  
 Adelaide, South Australia

<sup>i</sup> Department for Education, *Connected: a community approach to bullying prevention within the school gates and beyond*, Government of South Australia, 2023, <https://www.education.sa.gov.au/docs/support-and-inclusion/engagement-and-wellbeing/bullying/key-achievements-report.pdf>.

<sup>ii</sup> Department for Education, *South Australian bullying prevention strategy: evaluation report*, Government of South Australia, 2024, <https://www.education.sa.gov.au/docs/support-and-inclusion/engagement-and-wellbeing/bullying/final-report-bullying-prevention-strategy-stage-2-evaluation.pdf>.

<sup>iii</sup> G Skrzypiec, M Wyrą and MJ Lawson, ‘The confounding and problematic nexus of defined and perceived bullying’, *Children and Youth Services Review*, 2023, 155:107175, doi: 10.1016/j.chilyouth.2023.107175.

<sup>iv</sup> Legal Services Commission South Australia, *Bullying at school factsheet*, accessed 15 April 2025, [https://lsc.sa.gov.au/cb\\_pages/young\\_people\\_and\\_school\\_bullying.php](https://lsc.sa.gov.au/cb_pages/young_people_and_school_bullying.php).

<sup>v</sup> SafeWork SA, *Bullying & inappropriate behaviours*, Government of South Australia, accessed 15 April 2025, <https://www.safework.sa.gov.au/workers/health-and-wellbeing/mentally-healthy-workplaces/bullying-and-inappropriate-behaviours>.

<sup>vi</sup> Equal Opportunity SA, *Bullying at school*, Government of South Australia, accessed 15 April 2025, <https://www.equalopportunity.sa.gov.au/eo4schools/at-school/bullying-at-school>.

<sup>vii</sup> Department for Education, *Bullying prevention requirements*, EDi, Government of South Australia, accessed 15 April 2025, <https://edi.sa.edu.au/supporting-children/behaviour-and-attendance/bullying/bullying-prevention-requirements>.

<sup>viii</sup> Department for Education, *Supporting gender diverse, intersex and sexually diverse children and young people policy*, 2024, Government of South Australia, <https://www.education.sa.gov.au/policies/shared/supporting-gender-diverse-intersex-sexually-diverse-children-young-people-policy.pdf>; Department for Education, *Gender diverse and intersex children and young people support procedure*, 2024, Government of South Australia, <https://www.education.sa.gov.au/policies/shared/gender-diverse-intersex-children-young-people-support-procedure.pdf>.

- 
- <sup>ix</sup> Department for Education, Behaviour support policy, EDi, Government of South Australia, accessed 15 April 2025, <https://edi.sa.edu.au/library/document-library/shared/behaviour-support-policy.pdf>.
- <sup>x</sup> Department for Education, *Safe and supportive learning environments: plan of action 2024–2026*, Government of South Australia, <https://www.education.sa.gov.au/docs/support-and-inclusion/engagement-and-wellbeing/violence-in-schools/safe-and-supportive-learning-environments-plan-of-action.pdf>.
- <sup>xi</sup> Department for Education, *Safe and supportive learning environments: plan of action 2024–2026*, Government of South Australia, <https://www.education.sa.gov.au/docs/support-and-inclusion/engagement-and-wellbeing/violence-in-schools/safe-and-supportive-learning-environments-plan-of-action.pdf>.
- <sup>xii</sup> Department for Education, *Connected: a community approach to bullying prevention within the school gates and beyond*, Government of South Australia, 2023, <https://www.education.sa.gov.au/docs/support-and-inclusion/engagement-and-wellbeing/bullying/key-achievements-report.pdf>.
- <sup>xiii</sup> Catholic Education South Australia, *Safe environments for all*, South Australian Commission for Catholic Schools, accessed 15 April 2025, <https://www.cesa.catholic.edu.au/our-schools/safe-environments-for-all>.
- <sup>xiv</sup> Catholic Education South Australia, *Duty of care: procedure*, 2020, South Australian Commission for Catholic Schools, [https://www.cesa.catholic.edu.au/\\_files/d/75015/Duty\\_of\\_Care\\_Procedure.pdf](https://www.cesa.catholic.edu.au/_files/d/75015/Duty_of_Care_Procedure.pdf).
- <sup>xv</sup> Association of Independent Schools South Australia, accessed 15 April 2025, <https://www.ais.sa.edu.au/>.
- <sup>xvi</sup> Australian Institute of Health and Welfare (AIHW), 'Bullying', *Australia's children*, 2022, <https://www.aihw.gov.au/reports/children-youth/australias-children/contents/justice-safety/bullying>.
- <sup>xvii</sup> Department for Education, *South Australian Wellbeing and Engagement Collection: all SA students survey year: 2024: government and non-government students*, 2024, Government of South Australia, <https://www.education.sa.gov.au/docs/system-performance/data-reports/wec-results-report-2024.pdf>.