

PINNER WOOD SCHOOL



Anti-Bullying POLICY

Approval Authority

Effective From: September 2023

Date Ratified by GB:

Next Review Date: September 2025

Signed by Chair of GB:

Anti-Bullying Policy & Procedure

This policy also applies to the Early Years Foundation Stage (EYFS) and before and after school activities. This policy is to be read in conjunction with the Safeguarding and Child Protection Policy.

Pinner Wood School acknowledges the assistance provided by guidance documents prepared by the following public bodies, charities and not-for-profit organisations:

- The Department for Education (DfE)
- The Independent Schools Inspectorate (ISI)
- The Office for Standards in Education (Ofsted)
- www.cyberbullying.org and to the site's Author, Mr Bill Belsey, whose definition of cyberbullying is quoted
- Bullying UK, Registered Charity No 1120 (www.bullying.co.uk)
- www.childnet-int.org

References:

- A. *"Preventing and Tackling Bullying (July 2017)*
<http://www.gov.uk/government/publications/preventing-and-tackling-bullying>
- B. *ISI Handbook for the Inspection of Schools, Sept 2023*
- C. *The Early Years Foundation Stage Statutory Framework 2023*
- D. *"Bullying": An ISC Child Health and Wellbeing Working Party Guidance Update Five*
- E. *"Where You are NOT Alone" <http://www.bullying.org/>*
- F. *"Cyberbullying"- a briefing note on the ISBA web site by Farrer & Co*
- G. *"Child Protection and New Technologies" by Childnet International <http://www.childnet-int.org/>*
- H. *DCSF Guidance 'Safe to Learn': Embedding anti-bullying work in schools*
- I. *KCSIE document (DfE) Sept 2023*

1. Introduction

It is a government requirement that all schools have an Anti-Bullying Policy. This was followed by DfE guidance for schools under two headings: Don't Suffer in Silence; and Bullying – A Charter for Action. The KCSIE document also recognises that bullying should be addressed as a child protection issue. This policy reflects this guidance.

DfE guidance defines bullying as actions that are meant to be hurtful, and which happen on a regular basis. Bullying can be direct (either physical or verbal) or indirect (e.g. being ignored or not spoken to).

Bullying and victimisation in schools are high profile issues, which have the potential to inflict serious harm upon a school's reputation. The Government has expended considerable resources in trying to help schools to tackle this pernicious problem (see references above). The number of charities and not-for-profit organisations (see above) offering advice, guidance and training in this field reinforces the importance of the topic. The law requires all schools to have a robust policy in place for dealing with bullying in all forms. That policy should be regularly reviewed and monitored by the school's Senior Management Team and its Governors. Schools will have a strong and effective management team in place in order to ensure the maintenance of acceptable behaviour. Additionally, the school will devote significant amounts of both staff INSET training and lesson time towards ensuring that staff are trained to cope with such incidents, as and when they occur, and that pupils understand why such behaviour will not be tolerated.

2. Aims and objectives

At Pinner Wood School, our community is based upon respect, good manners and fair play. We are committed to providing a safe and caring environment that is free from disruption, violence and any form of harassment so that every one of our pupils can develop his/her full potential. We expect our pupils to treat members of staff with courtesy and co-operation so that they can learn in a relaxed, but orderly, atmosphere. All pupils should care for and support each other.

Pinner Wood School prides itself on its respect and mutual tolerance. Parents/guardians have an important role in supporting the school in maintaining high standards of behaviour. It is essential that school and homes have consistent expectations of behaviour and that they co-operate closely together. Acceptance of this policy forms part of our standard terms and conditions. This policy is available to parents of pupils and prospective pupils on our website and on request and for perusal in the school office during the school day. It is also available and known to staff.

Bullying, harassment, victimisation and discrimination will not be tolerated. We treat all our pupils and their parents fairly and with consideration and we expect them to reciprocate towards each other, the staff and the school. Any kind of bullying is unacceptable. This policy applies to all pupils in the school, including those in the Early Years Foundation Stage.

Bullying is wrong and damages individual children. We therefore do all we can to prevent it, by developing a school ethos in which bullying is regarded as unacceptable. It is fully recognised that abuse is abuse and should never be tolerated or passed as mere banter, 'part of growing up' or 'having a laugh.' A victim should never be given the impression that they are creating a problem by reporting bullying or abuse.

We aim, as a school, to produce a safe and secure environment where all can learn without anxiety, and measures are in place to reduce the likelihood of bullying. The school actively celebrates the success and good behaviour of its pupils e.g. good work assembly & merit certificates.

This policy aims to produce a consistent school response to any bullying incidents that may occur.

We aim to make all those connected with the school aware of our opposition to bullying, and we make clear each person's responsibilities with regard to the eradication of bullying in our school.

3. Definition of Bullying

Bullying may be defined as: *'Behaviour by an individual or group, repeated over time that intentionally hurts another individual or group, either physically or emotionally and is often motivated by prejudice against particular groups for example on grounds of race, religion, culture, sex, gender, homophobia, SEN and disability or because a child is adopted or is a carer. It may occur directly or through Cyber technology'*. Preventing and Tackling Bullying: Advice for School Leaders, Staff and Governing Bodies (see references).

Bullying is the intentional hurting, harming or humiliating of another person by physical (including sexual), verbal (including email, chat room and SMS messages), and emotional means (by excluding, tormenting or spreading malicious rumours). It can involve manipulating a third party to tease or torment someone. It can involve complicity that falls short of direct participation. Bullying is often hidden and subtle. It can also be overt and intimidatory.

Bullying may involve actions or comments that are motivated by prejudice against

particular groups, for example, on grounds of race, religion, culture, sex, gender, homophobia, special educational needs and disability, physical attributes (such as hair colour or body shape) or because a child is adopted or a carer. It may also Bullying can happen anywhere and at any time and can involve anyone - pupils, other young people, staff and parents. As set out in KCSIE 2023, the School recognises that children can abuse other children and this includes bullying, encompassing cyber-bullying, sexual harassment, physical abuse, sexting, upskirting, initiating / hazing type violence and rituals in addition to general physical harm. We also recognise the impact this can have upon mental health. Bullying on the basis of protected characteristics is taken particularly seriously. All staff are trained to recognise that mental health issues in children are a particular area of vulnerability.

Pinner Wood School is a co-educational school and we, therefore, recognise the potential gendered nature of child on child abuse. It is more likely that girls will be victims and boys perpetrators. However, as with all forms of abuse or bullying, this is unacceptable and will be taken seriously.

4. Cyberbullying definition

Mr Bill Belsey, the creator of the web site: www.cyberbullying.org defined this unpleasant and particularly intrusive phenomenon in the following terms:

“Cyberbullying involves the use of information and communication technologies to support deliberate, repeated, and hostile behaviour by an individual or group that is intended to harm others.”

Cyberbullying can involve Social Networking Sites, Facebook, Instagram, Threads, Snapchat and WhatsApp, emails and mobile phones used for SMS messages and as cameras.

5. Bullying outside school premises

Teachers have the power to discipline pupils for misbehaving outside the school premises “to such an extent as is reasonable”. This can relate to any bullying incidents occurring anywhere off the school premises, such as on school or public transport, outside the local shops, or in a town or village centre. Teachers recognise the responsibility they have to address bullying that occurs outside school.

Where bullying outside school is reported to school staff, it will be investigated and

acted on. The Headteacher should also consider whether it is appropriate to notify the police or anti-social behaviour coordinator in their local authority of the action taken against a pupil. If the misbehaviour could be criminal or poses a serious threat to a member of the public, the police should always be informed.

In all cases of misbehaviour or bullying the teacher can only discipline the pupil on school premises or elsewhere when the pupil is under the lawful control of the staff member.

6. What is a Bully?

Bullying takes place when one or more persons deliberately exert power or inappropriate behaviour over another individual and as a result, injure, intimidate or threaten that person.

A bully is:

- Someone who picks on smaller children
- Someone who likes teasing people
- Someone who hurts your feelings
- Someone who beats you up
- Someone who calls you names
- Someone who bosses you about
- Someone who threatens you
- Someone who follows you everywhere you go
- Someone who picks on you day after day
- Someone who hurts you
- Someone who has problems of their own and so makes problems for others
- Someone who is jealous of you
- Someone who takes or hides your belongings
- Someone who gets you into trouble
- Someone who writes nasty letters to you
- Someone who makes fun of you for any reason
- Someone who ruins your life
- Someone who tells tales about you
- Someone who makes nasty telephone calls, sends messages via text or social media
- Someone who shares inappropriate or hurtful images
- Someone who takes your friends away
- Someone who excludes you from their game/group

We recognise that this behaviour might not be intentional but all allegations will be investigated.

7. The school's response to bullying

At Pinner Wood School, we always treat bullying, including allegations of bullying, very seriously. It conflicts sharply with the school's policy on equal opportunities, as well as with its social and moral principles. Bullying can be so serious that it causes physical and psychological damage, eating disorders, self-harm and even suicide, and, whilst bullying is not a specific criminal offence, there are criminal laws which apply to harassment and threatening behaviour.

The school recognises that bullies are often victims too and therefore will need to be offered support.

A bullying incident may be treated as a Child Protection issue, when there is reasonable cause to believe that a child is suffering or likely to suffer significant harm. This may include child on child abuse as detailed in KCSIE 2023. Any concerns are reported to the DSL.

8. Signs of bullying

Changes in behaviour that may indicate that a pupil is being bullied include:

- Unwillingness to return to school
- Displays of excessive anxiety, becoming withdrawn or unusually quiet
- Failure to produce work, or producing unusually bad work, or work that appears to have been copied, interfered with or spoilt by others
- Books, bags and other belongings suddenly go missing or are damaged
- Change to established habits (e.g. giving up music lessons, change to accent or vocabulary)
- Diminished levels of self-confidence & mental health issues
- Frequent visits to the school office with symptoms such as stomach pains, headaches etc
- Unexplained cuts and bruises
- Frequent absence, erratic attendance, late arrival to class
- Choosing the company of adults
- Displaying repressed body language and poor eye contact
- Difficulty in sleeping, experiencing nightmares etc
- Talking of suicide or running away

Although there may be other causes for some of the above symptoms, a repetition of, or a combination of these possible signs of bullying should be investigated by parents and teachers.

The School recognises that even if there are no reported cases of peer-on-peer abuse, such abuse may still be taking place and is simply not being reported.

9. Preventative measures

A school's response to bullying should not start at the point at which a child has been bullied. The best schools develop a more sophisticated approach in which school staff proactively gather intelligence about issues between pupils which might provoke conflict and develop strategies to prevent bullying occurring in the first place.

We take the following preventative measures in place in order to ensure that bullying does not become a problem which is associated with Pinner Wood School:

- All new pupils, including our EYFS pupils are briefed thoroughly on the school's expected standards of behaviour. They are told what to do if they encounter bullying. It is made clear to pupils about the part they can play to prevent bullying, including when they find themselves as bystanders. We guarantee that whistle-blowers who act in good faith will not be penalised and will be supported.
- Where appropriate the school will invest in specialised skills to understand the needs of our pupils including those with SEN or disabilities and lesbian, gay, bisexual and transgender (LGBT pupils) as covered in the school's RSE curriculum.
- All new members of staff are given guidance on the school's anti-bullying policy and in how to react to allegations of bullying in their first week at Pinner Wood School. They are required to read the school's policy as part of their induction. We use appropriate assemblies to explain the school policy on bullying. Our PSHE programme is structured to give pupils an awareness of their social and moral responsibilities as they progress through the school. The programme is structured to enforce the message about community involvement and taking care of each other. The opportunity is provided for discussion of differences between people and the importance of avoiding prejudice based language.
- Other lessons, particularly RE, English and Drama highlight the issue of bullying and reinforce this message by teaching moral and spiritual values that show bullying to be unacceptable and by developing social skills.
- All our pupils are encouraged to tell a member of staff at once if they know that bullying is taking place.

- All reported incidents are recorded and investigated immediately. We always monitor reported incidents. Records of any incidents are kept securely in the Headteacher's office in order that patterns of behaviour can be identified and monitored.
- Behavioural issues are discussed and monitored at SLT meetings.
- We have experienced pastoral teachers and teaching assistants who are trained in handling any incidents as an immediate priority, and are alert to possible signs of bullying.
- Staff are always on duty at times when pupils are not in class and patrol the school site, particularly areas where bullying might occur. They are trained to be alert to inappropriate language or behaviour.
- We encourage close contact between the school and parents.
- The school displays advice on where pupils can seek help, including details of confidential helplines and websites connecting to external specialists, such as Childline and Kidscape etc.
- We reserve the right to investigate incidents that take place outside school hours, on school visits and trips and that occur in the vicinity of the school, involving our pupils.
- We welcome feedback from parents and guardians on the effectiveness of our preventative measures.
- We do not apply corporal punishment or use it as a threat.

10. Cyberbullying Preventative measures

In addition to the preventative measures described above, Pinner Wood School:

- Expects all pupils to adhere to its charter for the safe use of the Internet. Certain sites are blocked by our filtering system and our IT Department monitors pupils' use.
- May impose sanctions for the misuse, or attempted misuse of the Internet.
- Offers guidance on the safe use of social networking sites and cyberbullying in PSICHE lessons which covers blocking, removing contacts from 'buddy lists' and sharing personal data.
- Offers guidance on keeping names, addresses, passwords, mobile phone numbers and other personal details safe.
- Pupils are not permitted to have mobile phones in school unless special permission is granted by the Headteacher. If they are brought in they are left at the school office.

11. The role of Governors

The Governing Body supports the Headteacher in all attempts to eliminate bullying from our school. The Governing Body will not condone any bullying at all in our school, and any incidents of bullying that do occur will be taken very seriously, and dealt with appropriately.

12. The role of the Headteacher

It is the responsibility of the Headteacher to implement the school anti-bullying strategy, and to ensure that all staff (both teaching and non-teaching) are aware of the school policy, and know how to identify and deal with incidents of bullying. The Headteacher reports to the Governing Body about the effectiveness of the anti-bullying policy.

The Headteacher ensures that all children know that bullying is wrong, and that it is unacceptable behaviour in this school. The Headteacher draws the attention of children to this fact at suitable moments. For example, if an incident occurs, the Headteacher may decide to use an assembly as the forum in which to discuss with other children why this behaviour was wrong, and why a pupil is being punished.

The Headteacher ensures that all staff, including lunchtime staff, receive sufficient training to be equipped to identify and deal with all incidents of bullying. This

includes understanding that abuse includes child on child abuse which may be sexual including abuse in intimate personal relationships between peers (KCSIE 2023). Raising staff awareness of Anti-Bullying, through training allows them to take action to reduce the risk of bullying at times and places when it is most likely to occur. The staff are trained so that the principles of the staff policy are understood, legal responsibilities are known, action is defined to resolve and prevent problems and sources of support are available. Where appropriate, the school will invest in specialised skills to understand the needs of their pupils including those with SEN, or disabilities and lesbian, gay, bi-sexual and transgender, (LGBT), pupils.

The Headteacher sets the school climate of mutual support and praise for success, so making bullying less likely. Pinner Wood School creates an environment of good behaviour and respect, with helpful examples set by staff and older pupils and we celebrate success in our assemblies. When children feel they are important and belong to a friendly and welcoming school, bullying is far less likely to be part of their behaviour.

The Headteacher and Deputy Headteacher, who is responsible for duties, ensure that at all times there are high levels of staff to pupil ratios for supervision; this minimises the risk of child on child abuse.

13. The role of the Teacher and support staff

The staff in our school take all forms of bullying seriously, and seek to prevent it from taking place.

Teachers keep their own records of all incidents that happen in their class, and that they are aware of in the school. If Teachers witness an act of bullying, which is usually child on child abuse, they will either investigate it themselves or refer it to the Headteacher. Teachers and support staff do all they can to support the child who is being bullied. If a child is being bullied, after consultation with the Headteacher, the Teacher informs the child's parents.

When any bullying has taken place between members of a class, the Teacher will deal with the issue immediately. This may involve counselling and support for the victim, and punishment / counselling for the offender. Time is spent talking to the child who has done the bullying, explaining to them why their action was wrong and how they should change their behaviour in future. If a child is repeatedly involved in

bullying, we inform the Headteacher and the Special Needs Co-ordinator. We then invite the child's parents into school to discuss the situation. It is recognised that this can be the perpetrator or the victim.

In more extreme cases, e.g. where these initial discussions have proved ineffective, the Headteacher may contact external support agencies, such as the social services.

Teachers use a range of methods to help prevent bullying and to establish a climate of trust and respect for all. They use drama, role-play, stories etc., within the formal curriculum, to help pupils understand the feelings of bullied children, and to practise the restraint required to avoid lapsing into bullying behaviour. Circle time is used to praise, reward and celebrate the success of all children, and thus to help create a positive atmosphere.

14. The role of parents

The school aims to involve parents to ensure that they are clear that the school does not tolerate bullying and are aware of the procedures to follow if they believe that their child is being bullied.

Parents who are concerned that their child might be being bullied; or who suspect that their child may be the perpetrator of bullying, should contact their child's Class Teacher immediately. If they are not satisfied with the response, they should contact the Headteacher. If they remain dissatisfied, they should follow the school's Complaint Procedure, as detailed in the Complaints Policy.

Parents have a responsibility to support the school's Anti-Bullying Policy, actively encouraging their child to be a positive member of the school.

15. The role of pupils

Pupils are encouraged to tell anybody they trust if they are being bullied, and if the bullying continues, they must continue to let people know.

Pupils are invited to tell us their views about a range of school issues, including bullying, in the school council.

respected as an individual. We believe that every pupil has a right to receive his or her education in a safe and secure environment, free from intimidation, threat or harm from any other person. The school ensures and reinforces the message that pupils are clear about the part they play to prevent bullying, including when they find themselves as bystanders and need to tell a member of staff immediately of any incidents.

16. Commitment

The Headteacher and staff make a commitment to pupils that all reported incidents will be:

- Taken seriously and dealt with sensitively
- Followed up with the necessary action and support
- Brought out into the open where appropriate.

Practice

We adopted a three point Code of Practice aimed at pupils, staff and parents to encourage these values.

Code of Practice

Pupils' action if feeling bullied or unhappy:

- Value yourself and your feelings
- TELL your friends
- TELL your parents
- TELL the school
- Help yourself
- Ignore comments – do not react but TELL someone
- Prevent it out of school – avoid problem areas
- Prevent it in school – go to a member of staff or the Headteacher.
- If you see bullying, TELL someone
- Remember: It is the bully who has the problems, NOT YOU!

Parents' Action

- Encourage your child to talk to you about their school and social life.
- Watch your child for signs of distress
- Listen to your child.
- Talk to members of staff.

If your child is the victim of bullying:

- Contact the school.
- Make sure of the facts.
- Work with the school to support your child.

If your child is responsible for bullying:

- Do not ignore it.
- Make it clear that such behaviour is not acceptable.
- Work with the school to develop strategies to change behaviour.

Staff Action - If you suspect a pupil is being bullied or have an incident reported to you:

- Talk to the pupil.
- Listen.
- Offer support.
- **DO NOT IGNORE IT.**

1. Alert the class or Headteacher.
2. Make it clear to the bully that his/her behaviour is not acceptable.
3. Make it clear to the victim that the school can help and they will be supported.
4. Reassure the victim that it was not his or her fault that bullying occurred.
5. Reassure the pupil that he or she was right to tell you. As set out in KCSIE 2022 all staff must reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment.
6. If the bully gets into trouble it is his or her own fault, not the fault of the person who complained.
7. Continue to monitor the situation closely – do not assume that the bullying has stopped.

Where bully/bullies are identified, actions taken may include:

- Provision of pastoral care.
- Circle time and PSCHE.
- Verbal reprimand.
- Involvement of parent.
- Private apology.
- Reflection sheet.
- Withdrawal of privileges.
- Application of sanctions identified in the school Behaviour Policy.

17. Strategies For Dealing With Bullying

The following is a list of actions and sanctions available to staff depending on the perceived seriousness of the situation. The emphasis is always on a caring, listening approach as bullies are often victims too – that is why they bully.

- a. Talk to the suspected victim, and any witnesses.
- b. Identify the bully and talk about what has happened, to discover why they became involved.
- c. Make it clear that bullying is not tolerated at Pinner Wood School School.
- d. Application of sanctions identified in the school's Behaviour Policy.
- e. If the bully owns up then sanctions procedures outlined in the Behaviour Policy will be followed.

An additional sanction may be to arrange for the child to be escorted from the school premises.

Incidents of bullying are recorded as such in the School and class Behavioural Book.

If the suspected bully does not own up, investigate further. If it is clear that they are lying, continue with the procedure.

Continue monitoring the situation to ensure no repetition. The follow-up findings will be recorded in the monitoring section of the school Cause for concern folder in the Headteacher's office.

18. Procedures for dealing with reported bullying

If an incident of bullying is reported, the following procedures are adopted:

- a. The member of staff to whom it was reported, or who first discovers the situation, will control the situation, reassure and support the pupils involved.
- b. He/she will inform an appropriate member of the pastoral/SLT team as soon as possible.
- c. The member of staff will calmly explain the range of disciplinary measures that are potentially involved.
- d. The victim will be interviewed on his/her own and if appropriate asked to write an account of events.
- e. The bully, together with all others who were involved, will be interviewed individually.
- f. The incident should be recorded on a school cause for concern form and signed and dated before it is given to the deputy and Headteacher who are responsible for keeping all records of bullying and other serious disciplinary offences, securely in his/her office.
- g. The Headteacher will inform relevant staff as soon as possible.
- h. The victim will be interviewed at a later stage by a member of staff separately from the alleged perpetrator. It will be made clear to him/her why revenge is inappropriate. He/she will be offered support to develop a strategy to help him or herself.
- i. The alleged bully will be interviewed at a later stage by a member of staff, separately from the victim, and it will be made clear why his/her behaviour was inappropriate and caused distress. He/she will be offered guidance on modifying his or her behaviour, together with any appropriate disciplinary sanctions as set out in the school's Behaviour Management Policy; for example, completing a reflection sheet, detention, withdrawal of privileges or suspension. In particularly serious and/or persistent cases, the bully should expect permanent exclusion. Disciplinary sanctions will be implemented which reflect the seriousness of an incident and convey a deterrent effect, (strong sanctions such as exclusion may be necessary in cases of severe or persistent bullying).
- j. The parents/guardians of all parties should be informed and invited into school to discuss the matter. Their support should be sought.

- k. A way forward, including disciplinary sanctions and counselling, should be agreed. This should recognise that suitable support is needed both for children who are being bullied and for pupils who bully others, as well as dealing with appropriate disciplinary measures in accordance with the school's Behaviour Management Policy.
- l. A meeting involving all the parties, with close staff supervision, could be helpful in developing a strategy for all concerned to close the episode.
- m. A monitoring and review strategy will be put in place.
- n. In very serious cases, and only after the Headteacher has been involved, it may be necessary to make a report to the Police or to the Social Services. However, it is the policy of Pinner Wood School School to attempt to resolve such issues internally under the school's own disciplinary procedures, unless the matter is of such gravity that a criminal prosecution is likely. The school may exclude a pupil, either temporarily or permanently, in cases of severe and persistent bullying and in the event that the support put in place for the bully does not result in the modification of behaviour to an acceptable level. At this stage, given the seriousness of the bullying, the School would view this as a child protection issue and the relevant child protection procedures would be implemented.

19. EYFS Children

Even the youngest children are encouraged to behave towards each other with kindness and consideration. They have to learn to look after their own possessions and to respect other's possessions. We expect them to be honest, helpful and polite, and to work hard and to listen to others. They should respect everyone and learn to value differences and diversity. The EYFS Key Stage Leader is in day-to-day charge of the management of behaviour in the EYFS Department.

We explain to children why some forms of behaviour are unacceptable and hurtful to others. We rarely need to impose sanctions but sometimes we may remove a privilege for hurtful behaviour. Occasionally, a child may be sent to see the Deputy Headteacher who will explain the inappropriateness of a particular action but such instances are rare. Parents are always informed via the class teacher or Deputy Headteacher when any sanction or reproof is needed. In cases of repeated instances of hurtful or inappropriate behaviour, they will be invited into the school to discuss the situation with their Child's Teacher, the Head of the Foundation Stage and the Deputy Headteacher to agree a joint way of handling the difficulty.

20. Complaints procedure

Parents and pupils are encouraged to use our Complaints Procedure (which is published on our website) if they feel that their concerns about bullying (or any other matters) are not being addressed properly. Parents of EYFS children should be aware that they have the right to refer a complaint directly to ISI/OFSTED if they are unhappy with the way in which their complaint has been handled

21. Monitoring and review

This policy is monitored on a day-to-day basis by the Headteacher, who reports to Governors (on request) about the effectiveness of the policy.

This policy will be reviewed every two years or earlier if necessary.