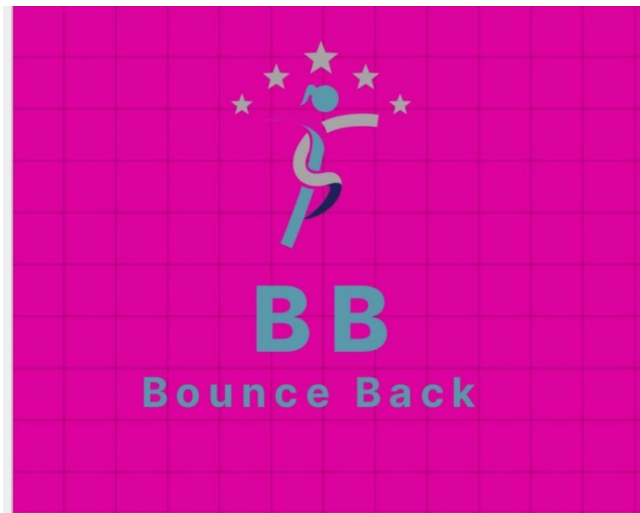


# Bounce Back Alternative Provision



## Anti-Bullying Policy

## Control Sheet

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## Table of Contents

1. Statement of Intent
2. Legal Framework
3. Definitions
4. Types of Bullying
5. Roles and Responsibilities
6. Statutory Requirements
7. Prevention
8. Signs of Bullying
9. Staff Principles
10. Child-On-Child Abuse
11. Cyber-Bullying
12. Procedures
13. Sanctions
14. Support
15. Follow-up Support
16. Bullying Outside of Bounce Back AP
17. Record Keeping
18. Monitoring and Review

## **1. Statement of intent**

Bounce Back AP believes that all children and young people are entitled to learn and develop in a safe and supportive environment; this means being free from all forms of bullying behaviour. This policy outlines how instances of bullying are dealt with, including the procedures to prevent occurrences of bullying.

These strategies, e.g. learning about tolerance and difference whilst in setting aim to promote an inclusive, tolerant and supportive ethos at Bounce Back AP.

The Education and Inspections Act 2006 outlines several legal obligations regarding the response to bullying. Under section 89, settings must have measures in place to encourage good behaviour and prevent all forms of bullying amongst children and young people. These measures are part of Bounce Back AP's Behaviour Policy, which is communicated to all children and young people, staff and parents/ carers.

All staff, parents/ carers and attendee's work together to prevent and reduce any instances of bullying at Bounce Back AP. There is a zero-tolerance policy for bullying.

## **2. Legal Framework**

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- Education and Inspections Act 2006
- Equality Act 2010
- Protection from Harassment Act 1997
- Malicious Communications Act 1988
- Public Order Act 1986
- Communications Act 2003
- Human Rights Act 1998
- Crime and Disorder Act 1998
- Education Act 2011
- DfE (2017) 'Preventing and tackling bullying'
- DfE (2018) 'Mental health and wellbeing provision in schools'
- DfE (2025) 'Keeping children safe in education 2025'
- DCMS, DSIT, and UK Council for Internet Safety (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'

This policy operates in conjunction with the following policies:

- Behaviour Policy
- Safeguarding and Child Protection Policy

- Child on Child abuse Guidance

### **3. Definitions**

For the purpose of this policy, “bullying” is defined as persistent behaviour by an individual or group with the intention of verbally, physically, or emotionally harming another person or group. Bullying is generally characterised by:

- Repetition: Incidents are not one-offs; they are frequent and happen over an extended period of time
- Intent: The perpetrator means to cause verbal, physical or emotional harm; it is not accidental
- Targeting: Bullying is generally targeted at a specific individual or group
- Power imbalance: Whether real or perceived, bullying is generally based on unequal power relations

Vulnerable children and young people are more likely to be the targets of bullying due to the attitudes and behaviours some young people have towards those who are different from themselves. Vulnerable pupils may include, but are not limited to:

- Children/ young people who are adopted
- Children/ young people suffering from a health problem
- Children/ young people with caring responsibilities
- Children/ young people from socioeconomically disadvantaged backgrounds

Pupils with certain characteristics are also more likely to be targets of bullying, including, but not limited to:

- Children/ young people who are LGBTQ+, or perceived to be LGBTQ+
- Black, Asian and minority ethnic (BAME) children and young people
- Children/ young people with SEND

### **4. Types of bullying**

Many kinds of behaviour can be considered bullying, and bullying can be related to almost anything. Teasing another person because of their appearance, religion, ethnicity, gender, sexual orientation, home life, culture, or SEND are some of the types of bullying that can occur. Bullying is acted out through the following mediums:

- Verbal
- Physical
- Emotional
- Online (cyberbullying)

**Racist bullying:** Bullying another person based on their ethnic background or skin colour. Racist bullying is a criminal offence under the Crime and Disorder Act 1998 and Public Order Act 1986.

**Homophobic and biphobic bullying:** Bullying another person because of their actual or perceived sexual orientation.

**Transphobic bullying:** Bullying based on another person's gender identity or gender presentation, or for not conforming to dominant gender roles.

**Sexist bullying:** Bullying based on sexist attitudes expressed in a way to demean, intimidate or harm another person because of their sex or gender. Sexist bullying may sometimes be characterised by inappropriate sexual behaviours.

**Sexual bullying:** Bullying behaviour that has a physical, psychological, verbal or non-verbal sexual dimension or dynamic that subordinates, humiliates or intimidates another person. This is commonly underpinned by sexist attitudes or gender stereotypes.

**Ableist bullying:** Bullying behaviour that focusses on another person's disability or support needs; this can include mocking the individual's disability or their needs, using derogatory words or slurs in relation to an individual's disability, or deliberately excluding an individual because of their disability.

**Prejudicial bullying:** Bullying based on prejudices directed towards specific characteristics or experiences, e.g. religion or mental health issues.

**Relational bullying:** Bullying that primarily constitutes of excluding, isolating and ostracising someone – usually through verbal and emotional bullying.

**Socioeconomic bullying:** Bullying based on prejudices against the perceived social status of the victim, including, but not limited to, their economic status, their parents' occupations, their health or nutrition level, or the perceived "quality" of their clothing or belongings.

## 5. Roles and responsibilities

The Governing Board is responsible for:

- Evaluating and reviewing this policy to ensure that it does not discriminate against any children or young people on the basis of their protected characteristics or backgrounds
- The overall implementation and monitoring of this policy
- Ensuring that all governors are appropriately trained regarding safeguarding and child protection at induction
- Ensuring that Bounce Back AP adopts a tolerant and open-minded policy towards difference
- Ensuring Bounce Back AP is inclusive
- Analysing any bullying data to establish patterns and reviewing this policy in light of these.

- Ensuring the DSL has the appropriate status and authority within Bounce Back AP to carry out the duties of the role
- Appointing a safeguarding link governor who will work with the DSL to ensure the policies and practices relating to safeguarding, including the prevention of cyberbullying, are being implemented effectively
- Ensuring that children and young people are educated on how to keep themselves and others safe, including online.

The proprietor is responsible for:

- Reviewing and amending this policy, accounting for new legislation and government guidance, and using staff experience of dealing with bullying incidents in previous years to improve procedures
- Keeping a record of all reported incidents, including which type of bullying has occurred, to allow for proper analysis of the data collected
- Analysing the data in the bullying record at termly intervals to identify trends, so that appropriate measures to tackle them can be implemented
- Arranging appropriate training for staff members

The Designated Safeguarding Lead is responsible for:

- Corresponding and meeting with parents where necessary
- Providing a point of contact for children/ young people and parents when more serious bullying incidents occur.

Staff are responsible for:

- Being alert to social dynamics
- Being available for children and young people who wish to report bullying
- Providing follow-up support after bullying incidents
- Being alert to possible bullying situations, particularly exclusion from friendship groups
- Refraining from stereotyping when dealing with bullying
- Understanding the composition of peer groups, showing sensitivity to those who have been the victims of bullying
- Reporting any instances of bullying once they have been approached by a child or young person for support

Parents are responsible for:

- Informing Bounce Back AP if they have any concerns that their child is the victim of bullying or involving in bullying in anyway
- Being watchful of their child's behaviour, attitude and characteristics and informing the relevant staff members of any changes.

Pupils are responsible for:

- Informing a member of staff if they witness bullying or are a victim of bullying
- Not making counter-threats if they are victims of bullying
- Walking away from dangerous situations and avoiding involving other children and young people in incidents

- Keeping evidence of cyberbullying and informing a member of staff should they fall victim to cyberbullying.



## 6. Statutory requirements

Bounce Back AP understands that, under the Equality Act 2010, it has a responsibility to:

- Eliminate unlawful discrimination, harassment, including sexual harassment, victimisation and any other conduct prohibited by the act
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it
- Foster good relations between people who share a protected characteristic and people who do not share it

The setting understands that, under the Human Rights Act (HRA) 1998, it could have charges brought against it if it allows the rights of children and young people to be breached by failing to take bullying seriously.

Although bullying itself is not a criminal offence, some types of harassment, threatening behaviour and/or communications may be considered criminal offences Under the Malicious Communications Act 1988, it is an offence for a person to electronically communicate with another person with the intent to cause distress or anxiety, or in a way which conveys a message which is indecent or grossly offensive, a threat, or contains information which is false and known or believed to be false by the sender.

- *The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct amounting to harassment*
- *Section 127 of the Communications Act 2003 makes it an offence to send, by means of a public electronic communications network, a message, or other matter, that is grossly offensive or of an indecent, obscene or menacing character. It is unlawful to disseminate defamatory information through any media, including internet sites*
- *Other forms of bullying which are illegal and should be reported to the police include violence or assault, theft, repeated harassment or intimidation, and hate crimes*

## 7. Prevention

Bounce Back AP will clearly communicate a whole-setting commitment to addressing bullying and have a clear set of values and standards which will be regularly promoted across the whole setting.

All staff will be made aware of this policy and their responsibilities in relation to it. All staff members will receive training on identifying and dealing with the different types of bullying.

The setting will explore and discuss issues at age-appropriate stages such as:

- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality

- Body confidence and self-esteem
- How to recognise abusive relationships and coercive control
- Harmful sexual behaviour, the concepts involved and why they are always unacceptable, and the laws relating to it

Staff will encourage child and young person cooperation and the development of interpersonal skills using group and pair work. Diversity, difference and respect for others will be promoted and celebrated. Opportunities to extend friendship groups and interactive skills will be provided through participation in special events.

Groups will be organised and altered in a way that prevents instances of bullying. Potential victims of bullying will be placed in working groups with other children and young people who do not abuse or take advantage of others.

A safe place, supervised by a member of staff, will be available for pupils to go to during free time if they feel threatened or wish to be alone. The staff member supervising the area will speak to children and young people to find out the cause of any problems and, ultimately, stop any form of bullying taking place. Staff will offer an 'open door' policy allowing attendees to discuss any bullying, whether they are victims or have witnessed an incident.

Before a new child or young person joins Bounce Back AP, particularly when this happens in year, staff and the DSL will conduct a transition handover meeting as necessary, and ensure transition support for the child or young person. Where a new attendee is deemed vulnerable, this strategy may involve further observation or intervention by the DSL.

Bounce Back AP will be alert to, and address, any mental health and wellbeing issues amongst children and young people, as these can be a cause, or a result, of bullying behaviour.

Bounce Back AP will ensure potential perpetrators are given support as required, so their educational, emotional and social development is not negatively influenced by outside factors, e.g. mental health issues.

## **8. Signs of bullying**

Staff will be alert to the following signs that may indicate a pupil is a victim of bullying:

- Being frightened to travel to or from setting
- Unwillingness to attend setting
- Repeated or persistent absence from setting
- Becoming anxious or lacking confidence
- Saying that they feel ill repeatedly
- Decreased involvement in setting activities
- Leaving setting with torn clothes or damaged possessions
- Missing possessions
- Asking for extra money or stealing
- Cuts or bruises
- Lack of appetite
- Unwillingness to use the internet or mobile devices

- Lack of eye contact
- Becoming short tempered
- Change in behaviour and attitude at home

Although the signs outlined above may not be due to bullying, they may be due to deeper social, emotional or mental health issues, so are still worth investigating. Children and young people who display a significant number of these signs will be approached by a member of staff to determine the underlying issues causing this behaviour.

Staff will be aware of the potential factors that may indicate a child or young person is likely to exhibit bullying behaviours, including, but not limited to, the following:

- They have experienced mental health problems, which have led to them becoming more easily aggravated
- They have been the victim of abuse
- Their academic performance has started to fall and they are showing signs of stress

If staff become aware of any factors that could lead to bullying behaviours, they will notify the Senior Leadership team/DSL and record their concern, they will then investigate the matter and monitor the situation.

## **9. Staff principles**

Bounce Back AP will ensure that prevention is a prominent aspect of its anti-bullying vision.

Staff will treat reports of bullying seriously and will not ignore signs of suspected bullying. Staff will act immediately when they become aware of a bullying incident. Unpleasantness from one child or young person towards another will always be challenged and will never be ignored.

Staff will always respect children and young people's privacy, and information about specific instances of bullying is not discussed with others, unless the child or young person has given consent, or there is a safeguarding concern. If a member of staff believes a child or young person is in danger, e.g. of being hurt, they will inform the DSL immediately.

Follow-up support will be given to both the victim and perpetrator in the months following an incident to ensure all bullying has stopped

## **10. Child-on-child abuse**

Bounce Back AP has a zero-tolerance approach to all forms of child-on-child abuse, including sexual harassment and sexual violence.

To prevent child-on-child abuse and address the wider societal factors that can influence behaviour, the setting will educate children and young people about abuse, its forms, and the importance of discussing any concerns and respecting others in line with the Prevention section of this policy.

All staff will:

- Be aware that children and young people of any age and gender are capable of abusing their peers
- Be aware that abuse can occur inside and outside of settings
- Be aware of the scale of harassment or abuse, and that just because it is not being reported does not mean it is not happening
- Take all instances of child-on-child abuse equally seriously regardless of the characteristics of the perpetrators or victims
- Never tolerate abuse as “banter” or “part of growing up”, and will never justify sexual harassment, e.g. as “boys being boys”, as this can foster a culture of unacceptable behaviours and one that risks normalising abuse
- Be aware that child-on-child abuse can be manifested in many ways, including sexting, sexual harassment and assault, and hazing or initiation-type violence
- Always challenge any harmful physical behaviour that is sexual in nature, such as inappropriate touching. Dismissing or tolerating such behaviours risks normalising them

Sexual harassment in particular can take many forms, including but not limited to:

- Telling sexual stories, making sexual remarks, or calling someone sexualised names
- Sexual “jokes” or taunting
- Deliberately brushing against someone
- Displaying images or video of a sexual nature
- Upskirting (this is a criminal offence)
- Online sexual harassment, e.g. creating or sharing sexual imagery, sexual comments on social media, or sexual coercion or threats

Children and young people will be made aware of how to raise concerns or make a report and how any reports will be handled – this includes the process for reporting concerns about friends or peers. If a child or young person has been harmed, is in immediate danger or is at risk of harm, a referral may be made to children’s social care services (CSCS) and potentially the police, where the DSL deems this appropriate in the circumstances.

All staff will be aware and sensitive towards the fact that children and young people may not be ready or know how to tell someone that they are being abused. Children and young people being abused may feel embarrassed, humiliated, scared, or threatened.

More information on the school’s approach to preventing and managing instances of child-on-child abuse can be found within the Safeguarding and Child Protection Policy.

## 11. Cyberbullying

Cyberbullying can take many forms and can go even further than face-to-face bullying by invading personal space and home life, and can target more than one person. It can also take place across age groups and target children and young people, staff and others, and may take place inside setting, within the wider community, at home or when travelling. It can sometimes draw bystanders into being accessories.

Cyberbullying can include the following:

- Threatening, intimidating or upsetting text messages
- Threatening or embarrassing pictures and video clips
- Disclosure of private sexual photographs or videos with the intent to cause distress
- Silent or abusive phone calls
- Using the victim's phone to harass others, to make them think the victim is responsible
- Threatening or bullying emails, possibly sent using a pseudonym or someone else's name
- Menacing or upsetting responses to someone in a chatroom
- Unpleasant messages sent via instant messaging
- Unpleasant or defamatory information posted to blogs, personal websites and social networking sites, e.g. Facebook NB. The above list is not exhaustive, and cyberbullying may take other forms

Bounce Back AP has a zero-tolerance approach to cyberbullying. Bounce Back AP views cyberbullying with the same severity as any other form of bullying and will follow the sanctions set out in this policy if they become aware of any incidents. All members of staff will receive training on an annual basis on the signs of cyberbullying, in order to identify pupils who may be experiencing issues and intervene effectively

Many of the signs of cyberbullying will be similar to those found in the signs of bullying section of this policy; however, staff will be alert to the following signs that may indicate a pupil is being cyberbullied:

- Avoiding use of the computer
- Being on their phone routinely
- Becoming agitated when receiving calls or text message

Staff will also be alert to the following signs which may indicate that a pupil is cyberbullying others:

- Avoiding using the computer or turning off the screen when someone is near
- Acting in a secretive manner when using the computer or mobile phone
- Spending excessive amounts of time on the computer or mobile phone
- Becoming upset or angry when the computer or mobile phone is taken away

Information will be shared with parents and carers to develop awareness in order to educate them on the signs and symptoms of cyberbullying, and will be advised to report to the proprietor if their child displays any of the signs outlined in this section.

Staff will be aware that a cyberbullying incident might include features different to other forms of bullying, prompting a particular response. Significant differences may include the following:

- Possible extensive scale and scope – children and young people may be bullied on multiple platforms and using multiple different methods that are made possible by virtue of the bullying taking place online
- The anytime and anywhere nature of cyberbullying – children and young people may not have an escape from the torment when they are at home due to the bullying continuing through technology at all times
- The person being bullied might not know who the perpetrator is – it is easy for individuals to remain anonymous online and on social media, and children and young people may be bullied by someone who is concealing their own identity
- The perpetrator might not realise that their actions are bullying – sometimes, the culture of social media, and the inability to see the impact that words are having on someone, may lead to children and young people crossing boundaries without realising
- The victim of the bullying may have evidence of what has happened – children and young people may have taken screenshots of bullying, or there may be a digital footprint that can identify the perpetrator

Staff and children and young people will be instructed not to respond or retaliate to cyberbullying incidents. Evidence of the incident should be recorded, e.g. taking screenshots. Staff will report incidents to their line manager or the proprietor for the incident to be investigated and support to be provided. Children and young people will report incidents to a trusted member of staff.

Where offensive content is posted online targeting a staff member or child/ young person, the person targeted will be encouraged to use the reporting mechanism on the website or social media platform to request its removal. Where the person who has posted it is known to the school, the proprietor will request they remove it directly.

Bounce Back AP will support children and young people who have been victims of cyberbullying by holding formal and informal discussions with the child/ young person about their feelings and whether the bullying has stopped, in accordance with this policy.

In accordance with the Education Act 2011, the setting has the right to examine and delete files from children and young people attending Bounce Back AP's personal devices, e.g. mobiles phones, where there is good reason to do so. This power applies to all schools and there is no need to have parental consent to search through a young person's mobile phone.

Artificial intelligence (AI):

Generative artificial intelligence (AI): Artificial intelligence (AI) tools are now widespread and easy to access. Staff, children and young people and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard. Bounce Back AP recognises that AI has many uses to help children and young people learn and develop, but may also have the potential to be used to bully others. For example, in the form of 'deep fakes', where AI is used to create images, audio or video hoaxes that look real.

Bounce Back AP treat any use of AI to bully pupils in line with this Anti Bullying policy/procedure.

## **12. Procedures**

Minor incidents will be reported to staff, who will investigate the incident, set appropriate sanctions for the perpetrator (in conjunction with the Senior Leadership Team), and make a record in writing of the incident and outcome.

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When investigating a bullying incident, the following procedures will be adopted:

- The victim, alleged perpetrator and witnesses are all interviewed separately
- Members of staff ensure that there is no possibility of contact between the children and young people being interviewed, including electronic communication
- If a child/ young person is injured, members of staff will tend to this and seek appropriate medical advice and contact parents/ carers as necessary for appropriate assessment of the extent of their injuries
- A room is used that allows for privacy during interviews
- Witnesses are used for serious incidents
- If appropriate, the alleged perpetrator, the victim and witnesses are asked to write down details of the incident; this may need prompting with questions from the member of staff to obtain the full picture
- The proprietor/ Headteacher will gather evidence of a cyberbullying incident; this may involve text messages, emails, photos, etc. provided by the victim
- Premature assumptions are not made, as it is important not to be judgemental
- Members of staff listen carefully to all accounts, being non-confrontational and not assigning blame until the investigation is complete
- All children and young people involved are informed that they must not discuss the interview with other children and young people

Due to the potential for some specific forms of bullying to be characterised by inappropriate sexual behaviour, staff members involved in dealing with the incident are required to consider whether there is a need for safeguarding processes to be implemented.

### **13. Sanctions**

If the proprietor is satisfied that bullying did take place, the perpetrator will be helped to understand the consequences of their actions and warned that there must be no further incidents. The proprietor will inform the perpetrator of the type of sanction to be used in this instance, e.g. removal of privileges, and future sanctions if the bullying continues. If possible, the proprietor will attempt reconciliation and will obtain an apology from the perpetrator. This will either be in writing to the victim, and/or witnesses if appropriate, or faceto-face, but only with the victim's full consent. Discretion will be used here; victims will never feel pressured into a face-to-face meeting with the perpetrator

Parents are informed of bullying incidents and what action is being taken.

All staff involved in managing instances of bullying will be aware that taking disciplinary action and providing support are not mutually exclusive actions, and should be conducted simultaneously to encourage more positive behaviour in future

Bounce Back AP will avoid unnecessarily criminalising children and young people for bullying or abusive behaviour where possible, as young people with criminal records face stigma and discrimination in future aspects of their lives. The focus when handling perpetrators will be supporting them to develop more positive behaviours and to refrain from abusive and bullying behaviours in the future.

Bounce Back AP understand that continued access to the setting can be important for rehabilitation of harmful behaviour, and will not exclude pupils unless as a last resort – where there have been serious or consistent incidents of bullying.

### **14. Support**

In the event of bullying, victims will be offered the following support:

- Emotional support and reassurance (either 'in house' via tiered pastoral provision or an external wellbeing service- depending on level of need)
- Reassurance that it was right to report the incident and that appropriate action will be taken
- Liaison with their parents to ensure a continuous dialogue of support
- Advice not to retaliate or reply, but to keep the evidence and show or give it to their parent or a member of staff
- Advice on aspects of online safety, in the event of cyberbullying, to prevent re-occurrence, including, where appropriate, discussion with their parents to evaluate their online habits and age-appropriate advice on how the perpetrator might be blocked online



- Discussion with their parent on whether police action is required (except in serious cases of child exploitation or abuse where the police may be contacted without discussion with parents)

The proprietor will carefully consider in each instance of bullying that is handled whether it is appropriate to split up the victim(s) and perpetrator(s), e.g. preventing them sharing spaces where possible, and will split up other harmful group dynamics to prevent further occurrences where necessary. Victims will be encouraged to broaden their friendship groups by joining lunchtime clubs or activities.

Staff, particularly the DSL, will work with the victim to build resilience, e.g. by offering emotional support/pastoral intervention.

The setting will acknowledge that bullying may be an indication of underlying mental health issues. The setting will work with the perpetrator regarding any underlying mental health or emotional wellbeing problems. This will be reviewed regularly.

## **15. Follow-up support**

The progress of both the perpetrator and the victim will be monitored. One-on-one sessions to discuss how the victim and perpetrator are progressing may be appropriate. If appropriate, follow-up correspondence will be arranged with parents one month after the incident.

Children and young people who have bullied others will be supported in the following ways:

- Receiving a consequence for their actions
- Being able to discuss what happened
- Being helped to reflect on why they became involved
- Being helped to understand what they did wrong and why they need to change their behaviour
- Appropriate assistance from parent

Children and young people who have been bullied will be assessed on a case-by-case basis and the DSL will, if necessary, refer the victim of bullying to external mental health/wellbeing services. This decision making and needs assessment will take place with the Senior Leadership Team. In cases where the effects of bullying are so severe that the child/ young person cannot successfully reintegrate back into the setting, the proprietor/ Headteacher and DSL will look to transfer the child/ young person to another alternative provision with the consent and involvement of the child or young person's parents.

## **16. Bullying outside of school**

Bounce Back AP are aware that bullying can happen both in and outside of setting, and will ensure that staff understand how to respond to reports of bullying that occurred outside setting in line with the Safeguarding and Child Protection Policy.

The proprietor has a specific statutory power to sanction children and young people for poor behaviour outside of the setting premises. Section 89(5) of the Education and Inspections Act 2006 gives the proprietor the power to regulate children and young people's conduct when they are not on Bounce Back AP's premises, and therefore, not under the lawful charge of a setting staff member

Where bullying outside Bounce Back AP is reported to staff, it will be investigated and acted upon. In all cases of misbehaviour or bullying, members of staff can only sanction the child or young person on Bounce Back AP's premises, or elsewhere when the child or young person is under the lawful control of the member of staff, e.g. on a trip

The proprietor is responsible for determining whether it is appropriate to notify the police of the action taken against a child or young person. If the misbehaviour could be of a criminal nature, or poses a serious threat to a member of the public, the police will be informed.

## **17. Record keeping**

The DSL will ensure that robust records are kept with regard to all reported or otherwise uncovered incidents of bullying – this includes recording where decisions have been made, e.g. sanctions, support, escalation of a situation and resolutions.

The proprietor and DSL will ensure that all decisions and actions recorded are reviewed on a termly basis for the purposes of:

- Identifying patterns of concerning, problematic or inappropriate behaviour on the part of certain children and young people that may need to be handled, e.g. with pastoral support
- Reflecting on whether cases could have been handled better and using these reflections to inform future practice
- Considering whether there are wider cultural issues at play within the setting, e.g. whether Bounce Back AP's culture facilitates discriminatory bullying by not adequately addressing instances, and planning to mitigate this
- Considering whether prevention strategies could be strengthened based on any patterns in the cases that arise
- Responding to any complaints about how cases have been handled

## **18. Monitoring and reviewing**

This policy is reviewed every two years by Bounce Back AP. Any changes to this policy will be communicated to all relevant stakeholders