



Anti-Bullying Policy 2026–27

Approved by:	Proprietor / Owners	Date: 1/9/26
Review by:	1/9/27	

Contents

1. Policy statement and aims
2. Legal framework and governance
3. Scope and definitions
4. Preventing bullying
5. Reporting bullying
6. Safeguarding triage and immediate action
7. Responding, investigating and deciding
8. Support, consequences and review
9. Online, off-site and commissioned-placement incidents
10. Recording, monitoring and complaints
- Appendix A: Staff response procedure
- Appendix B: Flexible tiered response
- Appendix C: Support and guidance

1. Policy Statement and Aims

1.1 ReFocus is committed to a safe, respectful and inclusive environment in which every pupil can learn and participate without bullying, harassment or intimidation. Bullying is unacceptable whether it takes place face-to-face, online, on or off site.

1.2 ReFocus will prevent bullying so far as reasonably practicable, respond promptly to concerns, protect pupils from further harm, hold pupils appropriately accountable and provide support that reduces the risk of recurrence.

1.3 Our aims are to:

- teach respectful relationships and safe online behaviour;
- provide accessible and trusted reporting routes;
- recognise bullying, discrimination and child-on-child abuse early;
- listen to pupils and act in their best interests;
- work with parents, carers, commissioners and professionals;
- apply safeguarding action, support and consequences fairly; and
- monitor patterns and improve practice across all ReFocus sites.

2. Legal Framework and Governance

2.1 This policy has regard to the Education (Independent School Standards) Regulations 2014, particularly paragraph 10; Independent School Standards guidance, April 2026; Keeping Children Safe in Education 2026; the Equality Act 2010; Human Rights Act 1998; DfE Preventing and Tackling Bullying guidance; and the statutory Mobile Phones in Schools guidance effective from September 2026.

2.2 The proprietor/owners retain legal accountability and approve this policy. The Headteacher manages implementation. The DSL leads safeguarding responses. The governing board provides support, scrutiny and oversight. All staff must recognise, report and respond to concerns in accordance with their role.

2.3 ReFocus is subject to the Equality Act school provisions, including duties not to discriminate, harass or victimise and to make reasonable adjustments for disabled pupils. ReFocus is not generally subject to the Public Sector Equality Duty in the same way as a maintained school.

3. Scope and Definitions

3.1 Bullying

Bullying is repeated, intentional harm by an individual or group where there is an imbalance of power. It may be physical, verbal, psychological, relational, discriminatory, sexualised or online. Power may arise from size, age, status, numbers, vulnerability, information, possession of an image, anonymity or the reach of online content.

A serious one-off incident may constitute abuse, harassment, discrimination, a safeguarding concern or a criminal offence even where it does not meet this definition. ReFocus will not wait for repetition before acting. A lack of proven intent does not prevent an appropriate response to serious or discriminatory harm.

3.2 Relational conflict

Ordinary disagreement or friendship difficulty usually involves a more equal balance of power and may not be bullying. ReFocus will still address unkindness and relational conflict and will monitor patterns so that repeated or targeted behaviour is identified.

3.3 Forms and motivations

Bullying may involve physical assault; threats; name-calling; rumours; deliberate exclusion; humiliation; coercion; damage or theft; discriminatory language; sexual comments; online harassment; impersonation; fake accounts; doxxing; abusive group chats; recording or sharing humiliating material; and manipulated or AI-generated content.

ReFocus will address bullying connected with any actual or perceived difference. The protected characteristics relevant to the Equality Act schools provisions are disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. ReFocus will also address bullying connected with care status, SEND, appearance, health, family circumstances, socioeconomic circumstances or any other difference.

4. Preventing Bullying

4.1 Prevention is embedded through ReFocus's culture, induction, key-worker programme, PSHE/RSHE, online safety, curriculum, staff modelling, supervision and consistent behaviour expectations.

4.2 ReFocus will:

- teach pupils to recognise bullying, child-on-child abuse, prejudice and harmful online behaviour;
- challenge discriminatory and sexualised language and conduct;
- promote safe bystander behaviour without placing pupils at risk;
- maintain staff visibility and review higher-risk locations and times;
- support pupils to build safe relationships and seek help;
- train staff in safeguarding thresholds, online evidence, SEND and restorative-practice limitations; and
- use pupil voice and incident information to improve prevention.

4.3 ReFocus is mobile-phone-free throughout the school day. This reduces opportunities for on-site cyberbullying but does not remove online risk outside school. Detailed device arrangements are contained in the separate Mobile Phones and Personal Devices Policy.

5. Reporting Bullying

5.1 A pupil may report to any trusted adult, key worker, the DSL or deputy, through the designated reporting email or an anti-bullying box, or with support from a parent, carer, advocate or commissioning school. Reporting arrangements will be accessible to pupils with SEND, EAL or communication needs.

5.2 Anonymous reports will be taken seriously, although anonymity may limit the investigation. Pupils will be told that staff cannot promise confidentiality and will share information only with people who need it to protect pupils and respond fairly.

5.3 A pupil will be reassured that they are being taken seriously, are not creating a problem by reporting and will not be blamed or shamed. Staff will record the pupil's account in their own words where possible and inform the DSL promptly where safeguarding may be involved.

6. Safeguarding Triage and Immediate Action

6.1 Before beginning an ordinary bullying investigation, the DSL or an appropriately trained member of staff will consider whether the report may involve child-on-child abuse, sexual harassment or violence, harmful sexual behaviour, nudes or semi-nudes, discriminatory abuse, exploitation, coercion, stalking, threats, weapons, serious violence, significant emotional harm or retaliation.

6.2 Where a safeguarding threshold is met, safeguarding procedures take priority. The anti-bullying process may continue alongside them only where safe and where it will not prejudice police, social-care or other enquiries.

6.3 Immediate action may include separation, supervision, a safety plan, medical attention, preserving evidence, contacting parents or professionals, adjusting transport or movement and protecting the reporting pupil from retaliation.

6.4 Child-on-child abuse is a safeguarding concern for both the pupil affected and the alleged perpetrator. It can occur in school, outside school and online and will never be dismissed as banter, part of growing up or normal teenage behaviour.

7. Responding, Investigating and Deciding

7.1 ReFocus will respond in a child-centred, timely and proportionate way. Accounts will normally be obtained separately. Staff will avoid repeated questioning, joint interviews and language that assumes the allegation has been proved.

7.2 The investigation may consider pupil and witness accounts, context, patterns, relevant electronic evidence, impact, power imbalance, SEND and communication needs, and information held by ReFocus or a commissioning school. Behaviour findings will be made on the balance of probabilities.

7.3 The pupil who reported or experienced the behaviour will be kept appropriately informed, but ReFocus will not disclose confidential information about another pupil's sanction, safeguarding response or personal circumstances.

7.4 Parents and carers will normally be informed promptly. Timing may be affected by immediate safety, the pupil's wishes and understanding, the risk of significant harm, police or social-care advice, preservation of an investigation and another school's involvement.

7.5 A report is not malicious merely because it is unsubstantiated, unfounded, withdrawn or does not lead to further action. A consequence will be considered only

where a fair investigation establishes that an allegation was deliberately invented or malicious.

8. Support, Consequences and Review

8.1 Support for the pupil affected

Support may include a trusted adult, safe arrival and departure, supervision, movement or seating adjustments, transport action, online-safety advice, attendance support, emotional-wellbeing provision and regular pupil-led review. The burden will not be placed on the affected pupil simply to cope with continuing harm.

8.2 Support and accountability for the pupil displaying behaviour

ReFocus will apply a proportionate consequence where appropriate and seek to understand motivation, triggers, peer dynamics, prejudice, SEND, communication, trauma, previous victimisation, exploitation and exposure to harmful material. Support does not remove accountability; it helps reduce recurrence.

8.3 Restorative work

Restorative work will be used only where it is safe, appropriate and voluntarily agreed by the pupil who experienced the behaviour. It will not interfere with safeguarding or police enquiries and will not ordinarily be used for sexual violence, coercive sexual harassment or other serious abuse. Either pupil may stop the process.

8.4 Sanctions, suspension and placement decisions

Consequences will follow the Behaviour Policy. Only the Headteacher or formally appointed Acting Headteacher may suspend. The Headteacher may recommend permanent exclusion, but the proprietor makes the final decision following ReFocus's published procedure, normally supported by a governing-board-led review panel. ReFocus cannot permanently exclude a pupil from another school's register. Any decision to end a commissioned placement must follow the Suspension, Permanent Exclusion and Placement Termination Policy and involve the commissioner. No outcome is automatic merely because behaviour is described as bullying.

8.5 Follow-up

A named member of staff will review safety, wellbeing and recurrence with the pupils involved. Initial review will normally occur within ten school days, with further review according to risk. Plans and reasonable adjustments will be revised where concerns continue.

9. Online, Off-site and Commissioned-placement Incidents

9.1 ReFocus may respond to off-site or online behaviour where it harms or threatens a pupil or staff member, creates a safeguarding risk, disrupts education, occurs while travelling or during a ReFocus activity, or has another sufficiently close connection with the school.

9.2 Online bullying includes abusive group chats, impersonation, exclusion, threats, doxxing, sharing recordings, coordinated harassment, deepfakes and synthetic media, and AI-generated sexualised, humiliating or discriminatory material.

9.3 Staff must not ask a pupil to show, forward or resend nude, semi-nude or sexualised content. They must not print, copy, save or forward it. The device or

information should be secured and the DSL informed immediately. The DSL will follow current UKCIS guidance and consider police or social-care involvement.

9.4 For commissioned pupils, ReFocus will notify and work with the home school or local authority according to the placement arrangements. Both settings will coordinate safety, support, attendance, transport and consequences and will not assume that the other has completed safeguarding follow-up.

10. Recording, Monitoring and Complaints

10.1 Records will distinguish behaviour information, safeguarding information, sanctions, support plans, communications and evidence. Sensitive safeguarding content will not be copied unnecessarily into general Bromcom comments. Access will be limited according to role.

10.2 Records will identify the type of concern, protected or contextual characteristic, site, location, time, online or off-site element, pupils involved, impact, action, support, parent and commissioner communication, finding, review and recurrence.

10.3 SLT will review operational information regularly. The governing board will receive anonymised information at least termly, including confirmed and potential bullying, relational conflict, cyberbullying, discriminatory and sexualised incidents, repeated pupils or locations, relevant pupil groups, outcomes and recurrence.

10.4 A concern about how ReFocus handled bullying may be raised under the Complaints Policy. Where the complaint concerns Paula Tucker as Headteacher/proprietor, the independent route in that policy applies. An immediate safeguarding concern will not wait for the complaints procedure.

10.5 A concern that a staff member harmed a pupil is handled under safeguarding and allegations procedures. Staff-on-staff bullying is handled through staff conduct, grievance or whistleblowing arrangements. Bullying or harassment of staff by pupils, parents or others is handled under the relevant behaviour, complaints and staff-safety procedures.

Appendix A: Staff Response Procedure

Receive: Listen calmly, reassure the pupil, do not promise confidentiality and record their words.

Protect: Assess immediate safety, retaliation, medical need and whether separation or supervision is required.

Triage: Consult the DSL before an ordinary investigation where abuse, sexualised conduct, discrimination, serious violence, imagery, exploitation or significant harm may be involved.

Preserve: Secure relevant evidence without copying, circulating or unnecessarily viewing harmful content.

Investigate: Obtain accounts separately, make reasonable adjustments, consider context and reach a fair finding on the balance of probabilities.

Respond: Provide support, apply proportionate consequences, involve parents and commissioners, and refer to agencies where necessary.

Review: Check safety and recurrence, record the outcome and revise plans where concerns continue.

Appendix B: Flexible Tiered Response

The framework is not a mandatory sequence. ReFocus may enter at any tier according to severity, impact, safeguarding risk, prejudice, online reach, vulnerability, previous behaviour and likelihood of recurrence.

Tier 1 – Relational conflict or isolated unkindness: Pastoral support, separate conversations, proportionate repair where safe, monitoring and parent contact where appropriate.

Tier 2 – Potential or emerging bullying: Key-worker and senior review, safety and support plan, parent and commissioner contact, behaviour response and scheduled follow-up.

Tier 3 – Confirmed or repeated bullying: DSL consideration, formal finding, support and behaviour agreement, proportionate sanction, targeted intervention and regular review.

Tier 4 – Serious, persistent or safeguarding-related harm: Immediate DSL and senior leadership response, safety planning, agency or police consideration, commissioner involvement, suspension or placement procedure where justified.

Appendix C: Support and Guidance

- Department for Education – Preventing Bullying
- Anti-Bullying Alliance
- Childline
- Kidscape
- NSPCC
- CEOP Education
- UK Safer Internet Centre
- Internet Watch Foundation
- Childline Report Remove
- Stop Hate UK