



Starfish AP
The Starfish Way
Anti-Bullying Policy
Academic Year 2026–2027

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Organisation	Starfish Alternative Provision
Academic Year	2026–2027
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Policy Owner	Chloe Fox
Designated Safeguarding Lead (DSL)	Chloe Fox
Applies To	All staff, volunteers, pupils, contractors, visiting
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Next Review	Sep 2027

The Starfish Way

At The Starfish Hub, we believe every child has the right to feel emotionally, physically and relationally safe.

Bullying undermines trust, damages belonging and creates barriers to learning, wellbeing and healthy relationships. As a relationship-first Alternative Provision, we believe that preventing bullying begins long before an incident occurs. It begins by creating an environment where children feel safe, known, respected and connected.

The Starfish Way is rooted in eight guiding principles:

- **Safety** – Every child deserves to feel physically, emotionally and psychologically safe.
- **Trust** – Consistent, reliable relationships are the foundation of meaningful change.
- **Attunement** – We seek to understand the need beneath behaviour and respond with curiosity before judgement.
- **Regulation** – Children learn best when they feel calm, supported and emotionally regulated.
- **Flexibility** – We adapt our practice to meet individual needs rather than expecting children to fit rigid systems.
- **Inclusion** – Every child has the right to belong, participate and be valued.
- **Support** – Positive outcomes are achieved through strong partnerships with families, schools, local authorities and other professionals.
- **Humanity** – Every interaction is rooted in dignity, compassion, empathy and hope.

These principles underpin every interaction, every conversation and every decision we make.

We recognise that behaviour is communication. Whilst bullying behaviour is never accepted, our response remains compassionate, restorative and firmly focused on safeguarding everyone involved. We seek to understand what has happened, protect those who have been harmed and support meaningful change through accountability, reflection and repair whenever appropriate.

At The Starfish Hub, we do not ask:
"How do we punish this behaviour?"

Instead, we ask:

"What is this behaviour communicating, who has been affected, and what support is needed to restore safety, rebuild trust and strengthen relationships?"

This philosophy shapes every aspect of our practice and is reflected throughout this policy.

1. Purpose

This policy sets out how The Starfish Hub prevents, identifies, responds to and records all forms of bullying.

It reflects our commitment to creating an environment where every child and young person feels safe enough to learn, regulate, develop positive relationships and thrive.

The aims of this policy are to:

- promote a culture of kindness, inclusion and belonging
- ensure every child feels safe and respected
- prevent all forms of bullying through proactive education and relationship-building
- respond consistently, fairly and proportionately when concerns arise
- protect children from physical and emotional harm
- support children to repair relationships wherever this can be achieved safely
- work collaboratively with parents, carers, schools, local authorities and other professionals
- fulfil our safeguarding responsibilities and statutory duties.

2. Scope

This policy applies to:

- all children attending The Starfish Hub
- all members of staff
- volunteers
- agency staff
- visiting professionals
- contractors
- governors or trustees (where applicable)
- parents and carers when engaging with members of the Starfish community.

It applies to behaviour:

- within The Starfish Hub
- during educational visits
- whilst travelling as part of Starfish activities
- during outreach work
- online where behaviour has an impact upon the safety or wellbeing of members of the Starfish community.

3. Legislative and Statutory Framework

This policy has been developed with reference to current legislation and statutory guidance, including:

- Keeping Children Safe in Education (current edition)
- Working Together to Safeguard Children
- Preventing and Tackling Bullying (Department for Education)
- Behaviour in Schools (Department for Education)
- Equality Act 2010
- Children Act 1989
- Children Act 2004
- Human Rights Act 1998
- Protection from Harassment Act 1997
- Malicious Communications Act 1988
- Public Order Act 1986
- Online Safety Act 2023 (where relevant to online behaviour and safeguarding).
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This policy should be read alongside the following Starfish policies:

- Safeguarding & Child Protection
- Behaviour & Relationships
- Online Safety
- Equality, Diversity & Inclusion
- Complaints
- Staff Code of Conduct
- Positive Handling
- Attendance
- SEND

4. What is Bullying?

The Department for Education defines bullying as:

"Behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group."

Whilst this definition underpins our practice, we recognise that children attending Alternative Provision often arrive with experiences of trauma, adverse childhood experiences, social communication differences or unmet needs which can affect how they interact with others.

For this reason, staff carefully distinguish between:

- conflict
- dysregulated behaviour
- impulsive behaviour

- relational difficulties
- and deliberate bullying.

This distinction allows us to respond proportionately whilst maintaining high expectations around safety and respect.

Not every disagreement is bullying.

Not every dysregulated response is bullying.

However, every concern will be taken seriously, explored sensitively and responded to appropriately.

5. Understanding Bullying at The Starfish Hub

At The Starfish Hub, we understand that children and young people attending Alternative Provision often arrive with complex life experiences. Many have experienced adverse childhood experiences (ACEs), trauma, disrupted education, unmet special educational needs, attachment difficulties, anxiety or social and emotional challenges.

These experiences can affect how children communicate, regulate emotions, build relationships and resolve conflict.

For this reason, our staff are trained to remain curious, calm and attuned before making assumptions about behaviour.

Understanding the reasons behind behaviour does not excuse bullying. Instead, it enables us to respond in ways that keep everyone safe whilst supporting meaningful and lasting change.

Every incident is considered individually, balancing accountability with compassion and always placing the safety and wellbeing of those affected at the centre of our response.

Recognising the Difference

To ensure children receive the right support, staff distinguish between different types of behaviour.

Conflict

Conflict occurs when two or more children disagree or experience a one-off disagreement where there is no ongoing intention to cause harm.

Conflict may involve:

- disagreements
- arguments
- misunderstandings
- friendship difficulties
- differing opinions
- accidental hurt.

Children involved in conflict require support to communicate effectively, repair relationships and develop problem-solving skills.

Conflict is not automatically bullying.

Dysregulated Behaviour

Some children attending Starfish may experience periods of emotional dysregulation.

During these times they may:

- shout
- use inappropriate language
- damage property
- withdraw completely
- react impulsively
- struggle to understand the impact of their behaviour.

Our first response is always to promote regulation and restore safety before seeking reflection or accountability.

Once the child is emotionally regulated, restorative conversations and appropriate consequences may follow where necessary.

Bullying

Bullying is behaviour that is:

- deliberate
- repeated over time
- intended to cause physical or emotional harm
- characterised by an imbalance of power.

Power may come from:

- physical strength
- popularity
- age
- confidence
- technology
- knowledge of someone's vulnerabilities
- social status
- repeated group behaviour.

Bullying causes harm and requires immediate intervention.

At Starfish, bullying is never viewed as an acceptable part of growing up.

6. Types of Bullying

Bullying can take many forms.

Children may experience one type or several simultaneously.

Examples include, but are not limited to:

Physical Bullying

Including:

- hitting
- kicking
- pushing
- spitting
- damaging belongings
- intimidating physical behaviour
- inappropriate physical contact.

Verbal Bullying

Including:

- name calling
- insults
- mocking
- threats
- humiliation
- offensive comments
- repeated teasing.

Social or Relational Bullying

This can often be more difficult to identify but can be equally harmful.

Examples include:

- deliberately excluding someone
- encouraging others to isolate someone
- spreading rumours
- manipulating friendships
- embarrassing someone publicly
- encouraging others not to speak to someone.

Online (Cyber) Bullying

Bullying does not stop when children leave the setting.

Online bullying may include:

- abusive messages
- fake accounts
- sharing images without consent
- exclusion from online groups
- threatening messages
- anonymous messaging
- humiliating photographs or videos
- misuse of artificial intelligence to generate harmful content
- online harassment through gaming platforms or social media.

Where online behaviour affects the safety or wellbeing of a child attending The Starfish Hub, it will be addressed in partnership with parents, schools and relevant agencies.

Prejudice-Based Bullying

The Starfish Hub has zero tolerance for bullying motivated by prejudice or discrimination.

This includes bullying relating to:

- race
- ethnicity
- nationality
- religion or belief
- disability
- special educational needs
- neurodiversity

- sex
- sexual orientation
- gender identity
- family circumstances
- looked after status
- young carers
- pregnancy or maternity
- socio-economic disadvantage.

Such incidents are treated as safeguarding concerns where appropriate and will be recorded and monitored carefully.

7. Preventing Bullying – The Starfish Approach

We believe the most effective way to prevent bullying is to create an environment where children experience safety, connection and belonging every day. Rather than relying solely on sanctions, our approach focuses on developing protective relationships and strengthening children's social and emotional understanding.

We prevent bullying by:

- building trusting relationships with consistent key adults
- creating emotionally and physically safe learning environments
- maintaining small group sizes
- modelling respectful relationships
- explicitly teaching emotional literacy
- helping children recognise and communicate emotions
- supporting co-regulation before self-regulation
- encouraging children to repair relationships following conflict
- celebrating kindness, empathy and inclusion
- teaching children how to disagree respectfully
- embedding restorative practice throughout daily routines
- working closely with families, schools and local authorities
- monitoring friendship dynamics and emerging concerns
- responding early before behaviours become established.

At Starfish, every interaction is viewed as an opportunity to strengthen connection.

Strong relationships remain our greatest protective factor against bullying.

Building a Culture of Belonging

- Children are significantly less likely to bully or experience bullying when they feel connected to their environment.
- We therefore place deliberate emphasis on:
 - children feeling known by trusted adults
 - every child having a voice
 - recognising strengths as well as needs
 - celebrating progress rather than perfection
 - creating opportunities for shared success
 - encouraging mutual respect
 - helping children develop empathy and perspective-taking
 - ensuring every child experiences genuine belonging.
- Bullying prevention is therefore not a standalone programme at The Starfish Hub.
- It is embedded within everything we do.

8. Roles and Responsibilities

- Creating a safe, respectful and inclusive environment is the responsibility of everyone within The Starfish Hub community.
- The Designated Safeguarding Lead (DSL)
- The Designated Safeguarding Lead (DSL) has overall responsibility for ensuring bullying concerns are managed effectively and in line with safeguarding procedures.
- The DSL will:
 - promote a culture where bullying is not tolerated
 - ensure this policy is implemented consistently
 - oversee the recording, monitoring and review of bullying incidents
 - ensure safeguarding concerns are identified and escalated appropriately
 - work collaboratively with families, schools, local authorities and external agencies where required
 - ensure staff receive appropriate safeguarding and anti-bullying training
 - monitor patterns or trends to inform preventative practice.

All Staff

Every adult at The Starfish Hub plays a vital role in preventing bullying.

Staff will:

- model respectful, compassionate and professional relationships
- remain vigilant to signs of bullying
- intervene promptly where concerns arise
- listen carefully to children without judgement

- reassure children that concerns will be taken seriously
 - record incidents accurately and promptly using the agreed recording systems
 - work restoratively wherever appropriate
 - seek guidance from the DSL when required
 - maintain professional curiosity when investigating concerns
- support all children involved without making assumptions.

Children and Young People

Children attending The Starfish Hub are expected to:

- treat others with kindness and respect
- value difference and diversity
- speak to an adult if they are worried about themselves or someone else
- understand that everyone has the right to feel safe
- contribute positively to the Starfish community
- engage honestly in restorative conversations.

Children will never be criticised for reporting concerns in good faith.

Parents and Carers

Parents and carers play an important role in helping us create safe environments.

We ask parents and carers to:

- report concerns promptly
- work collaboratively with staff
- encourage respectful behaviour at home and online
- support restorative approaches where appropriate
- communicate respectfully with members of the Starfish community.

Partner Schools and Commissioners

As an Alternative Provision, The Starfish Hub works closely with referring schools, local authorities and other professionals.

Where bullying concerns arise, we will:

- share relevant information appropriately
- contribute to multi-agency planning where necessary
- work towards consistent approaches between settings
- support successful reintegration wherever appropriate.

- reassure children that concerns will be taken seriously
 - record incidents accurately and promptly using the agreed recording systems
 - work restoratively wherever appropriate
 - seek guidance from the DSL when required
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9. Responding to Bullying Concerns

- Every report of bullying is taken seriously.
- Children should feel confident that they will be listened to, believed and supported.
- Our response will always prioritise:
 - Safety
 - Listening
 - Investigation
 - Support
 - Accountability
 - Repair
 - Ongoing monitoring

Immediate Response

When bullying is reported or witnessed, staff will:

- ensure everyone is physically and emotionally safe
- separate children where necessary
- remain calm and impartial
- listen carefully to all individuals involved
- reassure children that the concern will be investigated
- avoid asking leading questions
- inform the DSL where appropriate.
- Children should never feel responsible for resolving bullying themselves.

Investigation

Every concern will be investigated proportionately.

This may include:

- individual conversations
- written or verbal accounts
- reviewing CCTV (where available)
- reviewing online evidence
- speaking with witnesses
- discussions with parents
- consultation with referring schools
- consultation with safeguarding professionals where appropriate.

Investigations will always be fair, respectful and child-centred.

Recording

All incidents will be recorded promptly.

Records will include:

- date and time
- people involved
- nature of the concern
- action taken
- safeguarding considerations
- communication with parents
- communication with schools
- follow-up actions
- outcome.

Patterns and repeated concerns will be monitored to identify emerging risks.

10. Supporting Children

Supporting Children Experiencing Bullying

Children who experience bullying will receive support tailored to their individual needs.

This may include:

- regular check-ins with a trusted adult
- emotional regulation support
- opportunities to rebuild confidence
- restorative conversations where appropriate
- pastoral interventions
- referral to additional services where required
- increased supervision
- agreed safety plans.

Children will never be expected to "sort it out themselves."
Their emotional wellbeing remains our priority throughout.

Supporting Children Displaying Bullying Behaviour

Children who display bullying behaviour also require support.

Whilst they remain accountable for their actions, our aim is to help them understand:

- the impact of their behaviour
- healthier ways of expressing emotions
- respectful communication
- empathy
- conflict resolution
- emotional regulation.

Support may include:

- restorative meetings
- reflective conversations
- social skills work
- emotional literacy
- mentoring
- targeted interventions
- individual behaviour support
- involvement of parents and schools.

Where bullying behaviour is persistent or places others at risk, additional safeguarding and behaviour measures may be implemented.

Supporting Witnesses

Children who witness bullying can also experience distress.

They will be:

- listened to
- reassured
- encouraged to report concerns
- supported to understand how they can safely help others.

Creating a culture where children feel confident to speak up is central to safeguarding.

11. Restorative Practice

Restorative practice forms an important part of The Starfish Way.

Where appropriate, restorative conversations enable children to:

- understand the impact of their actions
- repair relationships
- rebuild trust
- develop empathy
- take responsibility
- make positive choices moving forward.

Restorative approaches will only be used where:

- the child experiencing harm feels safe
- participation is voluntary
- there is no ongoing safeguarding risk
- staff believe it is in the best interests of everyone involved.

Restorative practice is not a replacement for safeguarding procedures or appropriate consequences.

12. Online Bullying (Cyberbullying)

Technology plays an important role in children's lives and can enhance learning, communication and relationships. However, it can also be used in ways that cause harm.

At The Starfish Hub, online bullying is treated with the same seriousness as face-to-face bullying.

Online bullying may include, but is not limited to:

- abusive or threatening messages
- sharing images or videos without consent
- creating fake profiles
- impersonation
- deliberately excluding someone from online groups
- spreading rumours online
- sharing private information
- repeated harassment through gaming platforms
- misuse of artificial intelligence (AI) to create or share harmful content
- encouraging others to target an individual online.

Where online behaviour impacts the safety, wellbeing or educational experience of a child attending The Starfish Hub, staff will work collaboratively with parents, referring schools, local authorities and, where appropriate, external agencies.

Children are encouraged to report online concerns immediately and will always be supported to do so safely.

Online safety education forms part of our wider curriculum and pastoral provision.#

13. Bullying Towards Staff

The Starfish Hub is committed to providing a safe working environment for all employees, volunteers and visiting professionals.

Bullying, intimidation, harassment or abusive behaviour towards staff by:

- children
- parents or carers
- visitors
- contractors
- professionals
- members of the public will not be tolerated.

All concerns will be taken seriously and managed in accordance with the relevant organisational procedures.

Where necessary, safeguarding procedures, behaviour strategies, professional challenge or legal action may be considered.

Staff affected by bullying will be offered appropriate support from senior leaders.

14. Equality, Diversity and Inclusion

The Starfish Hub celebrates diversity and actively promotes inclusion.

We recognise that some children may be at increased risk of bullying because of protected characteristics or individual vulnerabilities.

These may include, but are not limited to:

- race or ethnicity
- religion or belief
- disability
- Special Educational Needs (SEND)
- neurodiversity
- sex
- sexual orientation
- gender reassignment
- looked after status
- young carers
- family circumstances
- pregnancy or maternity.

Incidents involving discrimination or prejudice will always be investigated thoroughly and recorded appropriately.

Where necessary, these incidents may also be managed as safeguarding concerns. We are committed to ensuring every child feels welcomed, respected and valued within our community.

15. Recording, Monitoring and Quality Assurance

Bullying concerns are monitored carefully to ensure that:

- children remain safe
- appropriate support is provided
- patterns or trends are identified
- practice continues to improve.

Records will be maintained using The Starfish Hub's safeguarding and information management systems, including CPOMS and Arbor where appropriate.

Senior leaders will regularly review:

- the frequency of incidents
- recurring themes
- protected characteristics
- locations or times where concerns arise
- effectiveness of interventions
- feedback from children and families.

This information helps us continually strengthen our preventative work and maintain a culture of safety and belonging.

16. Monitoring and Review

The Designated Safeguarding Lead is responsible for overseeing the implementation of this policy.

The policy will be reviewed:

- annually
- following significant changes in legislation or statutory guidance
- following any serious incident
- where monitoring identifies improvements are required.

Children, staff, families and partner agencies may contribute to future policy reviews to ensure our practice remains responsive and effective.

17. Related Policies

This policy should be read alongside the following Starfish Hub policies:

- Safeguarding & Child Protection
- Behaviour & Relationships
- Online Safety
- Equality, Diversity & Inclusion
- SEND
- Attendance
- Positive Handling
- Staff Code of Conduct
- Complaints
- Whistleblowing
- Health & Safety
- Mental Health & Wellbeing

18. Useful Organisations

Children, families and professionals may find the following organisations helpful:

- Anti-Bullying Alliance
- Childline
- NSPCC
- Kidscape
- Family Lives
- YoungMinds
- Internet Matters
- UK Safer Internet Centre

- CEOP Education
- The Diana Award Anti-Bullying Programme
- Victim Support

The Starfish Hub will signpost families to appropriate local or national services where additional support is required.

The Starfish Commitment

At The Starfish Hub, we know that children thrive when they experience safety, connection and belonging.

Bullying has no place within a community built upon trust, compassion and mutual respect.

We are committed to creating an environment where every child is known, every voice is heard and every concern is taken seriously.

Through relational practice, restorative approaches and strong partnerships with families, schools and local authorities, we strive to ensure that every child feels safe enough to learn, confident enough to grow and valued enough to succeed.

Our commitment is not simply to prevent bullying, but to nurture a culture where kindness, empathy and respectful relationships become the everyday experience of everyone who enters The Starfish Hub.

Appendix A – Responding to Bullying: Staff Procedure

When a concern is raised, staff should follow this sequence:

1. Make the situation safe – Ensure everyone involved is physically and emotionally safe.
2. Listen – Hear each child individually, without judgement or leading questions.
3. Record – Log the concern promptly using the agreed recording system.
4. Inform – Notify the Designated Safeguarding Lead if there are safeguarding concerns or repeated incidents.
5. Investigate – Gather information proportionately and fairly.
6. Support – Put immediate support in place for the child experiencing bullying.
7. Respond – Implement restorative approaches, educational interventions and, where necessary, proportionate consequences.
8. Communicate – Keep parents, carers, referring schools and relevant professionals informed as appropriate.
9. Review – Monitor outcomes and ensure the bullying has stopped.
10. Reflect – Consider whether any wider changes to practice, supervision or provision are needed to reduce future risk.