ALMA EDUCATION

Anti-Bullying Policy

Approval date:	August 2026
Review date:	August 2027
Version:	1.0
Approved by:	 Melanie Steel, Director of Education
Approved by:	Cathryn Williams, Advisory Board

Contents

Statement of Intent
1. Legal Framework and Related Policies
2. Definitions
3. Types of Bullying
4. Roles and Responsibilities
5. Statutory Requirements
6. Prevention
7. Signs of Bullying
8. Staff Principles
9. Child-on-Child Abuse
10. Cyberbullying
11. Procedures
12. Sanctions and Support
13. Follow-Up Support
14. Bullying Outside Sessions
15. Learners with SEND or Health Conditions
16. Record Keeping
17. Monitoring and Review

Statement of Intent

Every learner is entitled to take part in their sessions in a safe and supportive environment, free from all forms of bullying behaviour. This policy sets out how Alma prevents and responds to bullying, appropriate to a provision where learners are usually supported 1:1 or in small groups, in homes, community settings and Alma hubs.

Alma's sessions are structured to promote tolerance, difference and respect, so that learners build positive relationships with their learning mentor and, where sessions involve other learners, with each other. All staff, families and learners work together to prevent and reduce any instances of bullying, including bullying that reaches Alma sessions from elsewhere in a learner's life. There is a zero-tolerance approach to bullying at Alma.

Where bullying involves a learner's peers at their commissioning school, Alma works closely with the commissioning body, which retains responsibility for that wider environment.

Legislation and Statutory Guidance
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
Preventing Bullying (DfE, Jul 2026)
Keeping Children Safe in Education (2026)
Sharing Nudes and Semi-Nudes: Advice for Education Settings (DCMS, DSIT and UK Council for Internet Safety)
Supporting Pupils at School with Medical Conditions (Aug 2017)
Non-School AP Voluntary National Standards (Aug 2025)

1. Legal Framework and Related Policies

This policy has due regard to all relevant legislation and statutory guidance, including, but not limited to, the legislation and guidance listed in the table above.

This policy operates in conjunction with the following Alma policies:

- Behaviour Policy
- Child Protection and Safeguarding Policy
- Social, Emotional and Mental Health Policy
- SEND Policy
- Staff Code of Conduct

Online safety is embedded within the Child Protection and Safeguarding Policy.

2. 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.

Learners who are already vulnerable 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 learners may include, but are not limited to:

- Learners who are adopted.
- Learners suffering from a health problem.
- Learners with caring responsibilities.
- Learners from socioeconomically disadvantaged backgrounds.

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

- Learners who are LGBTQ+ or perceived to be LGBTQ+.
- Black, Asian and minority ethnic (BAME) learners.
- Learners with SEND.

3. 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 (as amended) and Public Order Act 1986.
- Homophobic and bi-phobic 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 focuses on another person's disability or support needs, including mocking the individual's disability or needs, using derogatory words or slurs, or deliberately excluding an individual because of their disability.
- Prejudicial bullying: bullying based on prejudices directed towards specific characteristics or experiences, for example religion or mental health.
- Relational bullying: bullying that primarily consists 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 family's circumstances, or the perceived 'quality' of their clothing or belongings.

4. Roles and Responsibilities

The Advisory Board

The Advisory Board, in its advisory role, will:

- Evaluating and reviewing this policy to ensure that it does not discriminate against any learner on the basis of their protected characteristics or background.
- Overseeing the implementation and monitoring of this policy.
- Seeking assurance that Alma adopts a tolerant and open-minded approach towards difference, and is inclusive.
- Analysing any bullying data to establish patterns and reviewing this policy in light of these.

- Seeking assurance that the DSL has the appropriate status and authority to carry out the duties of the role.
- Seeking assurance that learners are taught how to keep themselves and others safe, including online.

The Director of Education

The Director of Education is responsible for:

- Reviewing and amending this policy, accounting for new legislation and guidance, and using staff experience of dealing with bullying incidents to improve procedures.
- Keeping a bullying report form of all reported incidents, including the type of bullying that occurred, to allow for proper analysis of the data collected.
- Analysing the data in the bullying record at regular intervals to identify trends, so that appropriate measures can be implemented.
- Arranging appropriate training for staff members.
- Corresponding with parents, carers and commissioning bodies where necessary.
- Providing a point of contact for learners, families and commissioning bodies when more serious bullying incidents occur.

Learning mentors

Learning mentors are responsible for:

- Being alert to social dynamics between learners, where sessions involve more than one learner.
- Being available for learners who wish to report bullying.
- Providing follow-up support after bullying incidents.
- Being alert to possible bullying situations, particularly exclusion from friendship groups, and informing the Director of Education of such observations.
- Refraining from stereotyping when dealing with bullying.
- Showing sensitivity to learners who have been the victims of bullying.
- Reporting any instances of bullying once they have been approached by a learner for support.

Families and commissioning bodies

Parents and carers are asked to support this policy by:

- Informing the learning mentor or Director of Education if they have concerns that their child is the victim of bullying or involved in bullying in any way.
- Being watchful of their child's behaviour, attitude and characteristics, and informing Alma of any changes.

Learners

Learners are supported to take responsibility 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 drawing other learners into incidents.
- Keeping evidence of cyberbullying and informing a member of staff should they experience it.

5. Statutory Requirements

Alma 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.

Alma understands that, under the Human Rights Act 1998, it could have actions brought against it if it allows the rights of learners to be breached by failing to take bullying seriously. The Director of Education ensures that this policy complies with the Human Rights Act, and that all staff are fully involved in doing so.

Although bullying itself is not a criminal offence, some types of harassment, threatening behaviour and 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.

6. Prevention

Alma communicates a clear, whole-organisation commitment to addressing bullying, with a clear set of values and standards that are regularly reinforced through sessions.

All learning mentors are made aware of this policy and their responsibilities in relation to it, and receive training on identifying and dealing with the different types of bullying.

Where age-appropriate and relevant to a learner's programme, topics such as the following are explored:

- 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

Learning mentors encourage learners to build interpersonal skills, and diversity, difference and respect for others are promoted through sessions. Where a learner attends group sessions at an Alma hub, seating and groupings are organised to prevent instances of bullying, and potential victims of bullying are placed with learners who do not abuse or take advantage of others.

At an Alma hub, a safe, supervised space is available for learners to go to during free time if they feel threatened or wish to be alone. The supervising member of staff will speak to the learner to understand the cause of any problems and stop any form of bullying taking place.

Before a new learner joins Alma, particularly where sessions involve other learners, the learning mentor and DSL put a strategy in place to prevent bullying, including a settling-in period and clear introductions. Where a new learner is deemed vulnerable, this may involve further observation or support from the DSL.

Alma remains alert to, and addresses, any mental health and wellbeing issues among learners, as these can be a cause, or a result, of bullying behaviour, and works with the Social, Emotional and Mental Health Policy to support this. Alma also ensures potential perpetrators are given support as required, and the motivation behind any bullying behaviour is considered.

7. Signs of Bullying

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

- Being frightened to travel to or attend a session
- Unwillingness to take part in sessions
- Repeated or persistent absence from sessions

- Becoming anxious or lacking confidence
- Saying that they feel ill repeatedly
- Decreased engagement with learning
- Leaving a session 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 above may not be due to bullying, they may indicate deeper social, emotional or mental health issues, so are still worth exploring. Learners who display a significant number of these signs will be approached by their learning mentor to understand the underlying issues.

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

- They have experienced mental health difficulties, which have led to them becoming more easily agitated
- They have been the victim of abuse
- Their engagement with learning 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 Director of Education, who will explore the matter and monitor the situation.

8. Staff Principles

Alma ensures that prevention is a prominent part of its approach to bullying, and creates an ethos of good behaviour where learners treat their learning mentor and one another with respect because they know this is the right way to behave.

Staff treat reports of bullying seriously and do not ignore signs of suspected bullying. Staff act the same day when they become aware of a bullying incident.

Act immediately on any report
Any report, or sign, of bullying is acted on the same day it is noticed. Staff never wait to see if it happens again before raising it with the Director of Education or DSL.

Staff always respect learners' privacy, and information about specific instances of bullying is not discussed with others, unless the learner has given consent or there is a safeguarding concern. If a member of staff believes a learner is in danger, they inform the DSL immediately.

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

9. Child-on-Child Abuse

Alma recognises that child-on-child abuse often includes bullying. Alma 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 factors that can influence behaviour, Alma educates learners about abuse, its forms, and the importance of discussing any concerns and respecting others, in line with section 6 of this policy.

All staff will:

- Be aware that learners of any age and gender are capable of abusing their peers.
- Be aware that abuse can occur inside and outside of sessions.
- 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 those involved.
- Always challenge any harmful physical behaviour that is sexual in nature, such as inappropriate touching. Dismissing or tolerating such behaviour risks normalising it.
- 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.

Never tolerate abuse as "banter"

Staff never dismiss or excuse sexual harassment or abuse as banter, teasing, or a normal part of growing up. Doing so allows harmful behaviour to continue unchallenged, so every instance is treated seriously.

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, for example creating or sharing sexual imagery, sexual comments on social media, or sexual coercion or threats.

Learners are made aware of how to raise concerns or make a report and how any reports will be handled. If a learner has been harmed, is in immediate danger or is at risk of harm, a referral may be made to children's social care and potentially the police, where the DSL deems this appropriate.

All staff are sensitive to the fact that learners may not be ready or know how to tell someone that they are being abused. Learners being abused may feel embarrassed, humiliated, scared or threatened.

More information on Alma's approach to preventing and managing instances of child-on-child abuse can be found in the Child Protection and Safeguarding Policy.

10. Cyberbullying

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

Cyberbullying can include the following (this list is not exhaustive):

- 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

Alma has a zero-tolerance approach to cyberbullying, and views it with the same severity as any other form of bullying, following the approach set out in section 12 of this policy.

All staff receive training on an annual basis on the signs of cyberbullying, in order to identify learners who may be experiencing issues and intervene effectively.

Many of the signs of cyberbullying are similar to those in section 7 of this policy; however, staff are alert to the following signs that may indicate a learner is being cyberbullied:

- Avoiding use of the computer
- Being on their phone routinely

- Becoming agitated when receiving calls or text messages

Staff are also alert to the following signs which may indicate that a learner 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

Parents and carers are given advice on the signs and symptoms of cyberbullying, and are asked to report to the Director of Education if their child displays any of the signs above.

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

- Possible extensive scale and scope: learners may be bullied on multiple platforms and using multiple different methods.
- The anytime and anywhere nature of cyberbullying: learners may not have an escape from it when they are at home, because the bullying continues through technology.
- The person being bullied might not know who the perpetrator is: it is easy for individuals to remain anonymous online.
- The perpetrator might not realise that their actions are bullying: the culture of social media, and the inability to see the impact of words, may lead to learners crossing boundaries without realising.
- The victim of the bullying may have evidence of what has happened, for example screenshots or a digital footprint that can identify the perpetrator.

Staff and learners are instructed not to respond or retaliate to cyberbullying incidents. Evidence of the incident should be recorded, for example by taking screenshots.

Keep evidence, do not retaliate
If you experience or witness cyberbullying, do not respond or retaliate. Save the evidence, such as screenshots, messages, dates and times, and tell a trusted member of staff.

Staff report incidents to the Director of Education for the incident to be investigated and support to be provided. Learners are encouraged to report incidents of cyberbullying in person to a trusted member of staff, keeping hold of any evidence, and to speak to Alma before contacting the police unless there is a risk of immediate danger to them or someone else.

Where offensive content is posted online targeting a staff member or learner, the person targeted is encouraged to use the reporting mechanism on the website or social media platform to request

its removal. Where the person who posted it is known to Alma, the Director of Education will request they remove it directly.

Alma supports learners who have been victims of cyberbullying through formal and informal discussions about their feelings and whether the bullying has stopped, in accordance with this policy.

11. Procedures

Minor incidents are reported to the learner's learning mentor, who investigates the incident and informs the Director of Education in writing of the incident and outcome.

When investigating a bullying incident, the following procedure is followed:

- The victim, alleged perpetrator and any witnesses are interviewed separately.
- Staff ensure there is no possibility of contact between those being interviewed, including electronic communication.
- If a learner is injured, staff arrange first aid or medical attention in line with the First Aid Policy.
- A private space is used for interviews.
- A witness is used for serious incidents.
- If appropriate, those involved are asked to write down details of the incident, which may need prompting with questions from a member of staff to obtain the full picture.
- The Director of Education gathers evidence of a cyberbullying incident, which may include text messages, emails and photos provided by the victim.
- Premature assumptions are not made, as it is important not to be judgemental at this stage.
- Staff listen carefully to all accounts, remaining non-confrontational and not assigning blame until the investigation is complete.
- Everyone involved is asked not to discuss the interview with others.

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

Immediate danger: call 999
If a learner is in immediate danger or at risk of serious harm, call 999 first, then inform the DSL straight away.

12. Sanctions and Support

Alma appropriately addresses any cases of bullying, takes a strong stand against bullying, and tackles it at the earliest opportunity to prevent it escalating.

Any response is decided case by case, depending on the severity of the issue, in line with the Behaviour Policy.

Where possible, the Director of Education will attempt reconciliation and seek an apology from the perpetrator, either in writing to the victim, or face to face, but only with the victim's full consent. Victims are never pressured into a face-to-face meeting with the perpetrator.

Parents, carers and the commissioning body are informed of bullying incidents and what action is being taken.

Staff involved in managing instances of bullying are aware that responding to the behaviour and providing support are not mutually exclusive, and both happen together to encourage more positive behaviour in future.

Alma avoids unnecessarily criminalising learners for bullying or abusive behaviour where possible, as young people with criminal records face stigma and discrimination in future aspects of their lives. Alma's focus when responding to perpetrators is supporting them to develop more positive behaviours and to move away from bullying behaviour in future.

The learning mentor informally monitors the learners involved over the following weeks.

Alma works to keep learners engaged in their sessions throughout, in line with the Behaviour Policy, and involves the commissioning body in any decision that affects a learner's placement.

In the event of bullying, victims are offered the following support:

- Emotional support and reassurance from their learning mentor
- Reassurance that it was right to report the incident and that appropriate action will be taken
- Liaison with their parents or carers to ensure a continuous dialogue of support
- Advice not to retaliate or reply, but to keep the evidence and show or give it to a parent, carer or member of staff
- Advice on aspects of online safety, in the event of cyberbullying, including discussion with their parents or carers about their online habits and age-appropriate advice on how the perpetrator might be blocked online
- Discussion with their parent or carer 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 Director of Education carefully considers, in each instance of bullying, whether it is appropriate to adjust session arrangements to keep those involved apart, and works with the learner to broaden their friendship groups and activities where appropriate.

Staff, particularly the DSL, work with the victim to build resilience, for example through emotional support.

Alma acknowledges that bullying may be an indication of underlying mental health issues. Perpetrators are supported to access appropriate help with any underlying mental health or emotional wellbeing issues, in line with the Social, Emotional and Mental Health Policy.

13. Follow-Up Support

The progress of both the perpetrator and the victim is monitored by their learning mentor. One-to-one sessions to discuss how each is progressing may be appropriate. Where appropriate, follow-up correspondence is arranged with parents or carers one month after the incident.

Learners who have been bullied are offered continuous support. The DSL holds a formal check-in, on a monthly basis, to confirm whether the bullying has stopped, continuing until the Director of Education and the learner are confident it has stopped. The learner is encouraged to tell a trusted adult if bullying is repeated.

Learners who have bullied others are supported by:

- Receiving an appropriate response to 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 involvement from parents or carers

Learners who have been bullied are assessed case by case, and the DSL will, if necessary, refer the learner to CAMHS.

Where the effects of bullying are so severe that a learner's placement with Alma is no longer the right fit, the Director of Education, DSL and commissioning body meet, with the learner and their family, to discuss next steps.

14. Bullying Outside Sessions

Staff remain aware that bullying can happen both in and outside sessions, and understand how to respond to reports of bullying that occurred outside a session, in line with the Child Protection and Safeguarding Policy.

Where bullying outside a session is reported to Alma staff, it is explored and acted on. Because Alma does not have the same statutory powers as a school over a learner's conduct outside

sessions, any concern about bullying happening at the learner's school, or in the wider community, is shared promptly with the commissioning body, who Alma works with to agree next steps.

The Director of Education is responsible for determining whether it is appropriate to notify the police of any action taken. If the behaviour could be of a criminal nature or poses a serious threat to a member of the public, the police will be informed.

15. Learners with SEND or Health Conditions

Alma recognises the additional barriers that can exist for learners with SEND and health conditions, and is aware of the potential for these learners to be more prone to isolation or bullying than others.

Alma also recognises that learners with SEND or certain medical conditions may be disproportionately affected by bullying, without outwardly showing signs.

Alma creates an environment in which everyone celebrates diversity, and puts in place effective arrangements to prevent stigmatising or bullying relating to medical conditions.

Alma follows the Health and Safety Policy and SEND Policy to ensure that an inclusive, respectful environment is maintained for all learners, and ensures learners understand that bullying someone because of a disability or health condition is never acceptable.

16. Record Keeping

The DSL ensures that robust and consistent records are kept of all reported or otherwise identified incidents of bullying, including where decisions have been made, for example support provided, escalation of a situation and resolutions.

The Director of Education and DSL review all decisions and actions recorded on a regular basis, for the purposes of:

- Identifying patterns of concerning behaviour that may need further support.
- Reflecting on whether cases could have been handled better, and using these reflections to inform future practice.
- 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.

17. Monitoring and Review

This policy is reviewed annually by the Director of Education and the Advisory Board, or sooner if required by changes in legislation or statutory guidance. Any necessary amendments will be communicated to all staff. This policy was approved by Melanie Steel, Director of Education, in August 2026 and is due for review in August 2027.