LIGHTHOUSE
LEARNING PROVISION
BELONG • GROW • ACHIEVE • THRIVE
PRACTICAL LEARNING. EMOTIONAL GROWTH. PREPARATION FOR ADULTHOOD.

OPERATIONAL AND PUBLIC POLICY

Anti-Bullying Policy

Belong • Grow • Achieve • Thrive

Organisation	Lighthouse Learning Provision Ltd
Policy owner	Board of Directors / Provision Lead (Adam Waldron)
Safeguarding lead	Adam Waldron - Director and Designated Safeguarding Lead
Deputy safeguarding lead	Rachel Waldron - Director and Deputy DSL / Named Safeguarding Person
Approved / published	July 2026
Version	2.0
Review	July 2027, or sooner following relevant legal, safeguarding, operational or commissioning change

Bullying is never dismissed as banter or an inevitable part of growing up. Lighthouse acts to secure safety, understand context, change behaviour and repair harm where this is safe.

Policy at a glance

Lighthouse does not tolerate bullying, intimidation, harassment or discriminatory behaviour. Every concern will be listened to, recorded and assessed. The harmed learner will be protected and supported; the learner displaying bullying behaviour will be helped to understand impact, change behaviour and repair harm where appropriate; and witnesses will be supported to act safely. Safeguarding action is taken immediately whenever the concern involves abuse, exploitation, sexual harm, serious violence or significant risk.

Contents

1. Purpose and aims
2. Scope, status and framework
3. Definition and characteristics of bullying
4. Forms of bullying and related harmful behaviour
5. Principles and Lighthouse ethos
6. Roles and responsibilities
7. Prevention and proactive practice
8. Learner voice and ways to report
9. Immediate response to a bullying concern
10. Safeguarding threshold and urgent escalation
11. Assessment, investigation and decision-making
12. Support for the harmed learner
13. Work with the learner displaying bullying behaviour
14. Witnesses, bystanders and group dynamics
15. Restorative and relationship-repair approaches
16. Prejudice-related and discriminatory bullying
17. SEND, communication and neurodivergence
18. Online, community, transport and off-site bullying
19. Sexual bullying, sexual harassment and harmful sexual behaviour
20. Concerns involving adults
21. Parents, carers, schools and commissioners
22. Consequences, placement safety and exclusionary decisions
23. Recording, monitoring and quality assurance
24. Complaints, escalation and review
25. Reference framework

1. Purpose and aims

1.1 This policy explains how Lighthouse Learning Provision Ltd prevents, identifies, records and responds to bullying and related harmful behaviour affecting children and young people connected with the provision.

1.2 Lighthouse aims to:

- minimise bullying through a safe, respectful and relationship-led culture;
- ensure children know how to report concerns and are confident that adults will act;
- protect the safety, dignity, wellbeing and education of any child who is harmed;
- change the behaviour of the person or people using bullying behaviours rather than simply moving the problem elsewhere;
- help witnesses and bystanders recognise their influence and respond safely;
- identify patterns, environmental factors and unmet needs that may contribute to harm;
- work promptly with families, home schools, commissioners and safeguarding agencies; and
- use incidents and learner feedback to improve supervision, curriculum, risk assessment and practice.

1.3 This policy is preventive, protective and educational. It does not replace the Safeguarding and Child Protection Policy, Behaviour and Relational Practice Policy, Complaints Policy or any criminal, regulatory or Local Authority process that may be required.

2. Scope, status and framework

2.1 The policy applies to all learners, directors, employees, self-employed practitioners, contractors, volunteers and visitors. It covers conduct at the Lighthouse base, during transport, community and outdoor learning, online communication, visits, work-related learning and any activity connected with Lighthouse.

2.2 It applies to learner-to-learner behaviour and to concerns involving adults where bullying, intimidation, harassment, discrimination or abuse affects a child or the safe delivery of provision. Adult employment disputes may also require a grievance, conduct, whistleblowing or contractual route.

2.3 Lighthouse is an independent non-school alternative provision provider. School-specific statutory duties do not transfer automatically to Lighthouse, but the organisation adopts relevant Department for Education anti-bullying, safeguarding and behaviour guidance as sector good practice and meets commissioner requirements applicable to the placement.

2.4 The policy is informed by Working Together to Safeguard Children 2026, the current Keeping Children Safe in Education framework as relevant good practice, the Equality Act 2010, the Human Rights Act 1998, data-protection law and the Department for Education voluntary national standards for non-school alternative provision.

3. Definition and characteristics of bullying

3.1 Bullying is behaviour by an individual or group that is intended or reasonably likely to hurt, intimidate, humiliate, isolate, control or undermine another person. It is usually repeated over time and commonly involves a real or perceived imbalance of power.

> **Three common characteristics**
> Bullying is commonly ongoing or repeated, harmful or deliberately intimidating, and unequal because the person harmed finds it difficult to defend themselves or stop the behaviour. Power may arise from size, age, numbers, confidence, status, information, relationships, disability, communication, popularity, access to technology or control of a group.

3.2 A single incident may not meet the usual definition of bullying, but it can still be serious, discriminatory, abusive, criminal or a safeguarding matter and will be acted upon. Lighthouse will not refuse support merely because repetition has not yet been established.

3.3 Conflict, disagreement and friendship difficulty are not automatically bullying. They may involve relatively equal power and a willingness on both sides to resolve the issue. Staff must assess the pattern, impact, intent, power imbalance, vulnerability and ability of each child to withdraw or seek help rather than relying on labels alone.

4. Forms of bullying and related harmful behaviour

Bullying and related harmful behaviour may include:

- physical behaviour - hitting, kicking, pushing, restraining, spitting, taking belongings, damaging property or threatening violence;
- verbal behaviour - name-calling, insults, threats, mocking, hostile teasing, intimidation or repeated unkind comments;
- relational or indirect behaviour - exclusion, coercion, controlling friendships, malicious rumours, public humiliation, manipulation, social pressure or encouraging others to isolate a child;
- online behaviour - harmful messages, group-chat exclusion, impersonation, harassment, image sharing, doxxing, gaming abuse, fake accounts or repeated contact;
- sexual bullying or harmful sexual behaviour - sexual comments, rumours, gestures, coercion, unwanted touching, pressure to share images or abuse within an intimate relationship;
- prejudice-related behaviour connected with disability, race, nationality, religion or belief, sex, sexual orientation, gender reassignment or another actual or perceived identity;
- SEND-related bullying, including mocking communication, sensory needs, appearance, behaviour, mobility, learning difference or use of reasonable adjustments;
- extortion, theft, exploitation, forced activity, threats linked to debt or status, or use of a child to carry out harm; and
- retaliation against a child or witness for reporting a concern or supporting someone else.

4.2 Harm can be face-to-face, indirect, online or a combination. It can occur inside or outside Lighthouse and may continue across home, school, transport, community and digital environments.

5. Principles and Lighthouse ethos

- Every child has the right to feel safe, respected and able to participate in learning.
- Bullying is not tolerated, ignored, normalised or dismissed as banter.
- Children are listened to and supported to communicate in ways that work for them.
- The impact on the child is considered even where harmful intent is disputed.
- Adults respond calmly, promptly, predictably and without humiliating any child.
- Safety and regulation come before investigation, consequence or restorative discussion.
- Accountability is compatible with a trauma-informed approach; understanding behaviour does not excuse harm.
- Children who display harmful behaviour remain children and may also need safeguarding, education and support.
- Restorative contact is voluntary and used only where safe, appropriate and not likely to minimise abuse.
- No child or adult will be disadvantaged for raising a genuine concern in good faith.

6. Roles and responsibilities

6.1 Board of Directors

- approve this policy and ensure sufficient resources, staffing, supervision and training;

- maintain clear links between anti-bullying, safeguarding, behaviour, equality, online safety and complaints arrangements;
- review serious incidents, repeated patterns, discriminatory harm and commissioner concerns;
- ensure actions are completed and that unsafe practice is challenged; and
- monitor whether children and families can report concerns safely and accessibly.

6.2 Provision Lead and session leaders

- create safe daily routines and supervise known risk points;
- respond immediately to reported or observed bullying;
- ensure records, safety actions and communication are completed;
- coordinate investigation and support unless the matter requires safeguarding leadership; and
- review individual plans, group arrangements and environmental controls.

6.3 DSL and Deputy DSL

Adam Waldron, Director and DSL, and Rachel Waldron, Director, Deputy DSL and Named Safeguarding Person, will lead where bullying may involve child-on-child abuse, exploitation, sexual harm, serious violence, discrimination amounting to significant harm, coercion, criminality, online abuse or other safeguarding risk. They may contact the commissioner, children's social care, LADO or police without delay.

6.4 All adults

- model respectful language, safe boundaries and non-discriminatory behaviour;
- notice and challenge bullying, including low-level and indirect behaviour;
- listen, protect, record and report rather than assuming someone else will act;
- avoid public confrontation or forced apologies that increase shame or risk;
- preserve relevant evidence, including online material, without forwarding harmful content unnecessarily; and
- follow agreed supervision, support and review actions.

6.5 Learners

Learners will be helped to understand that they should seek help, avoid joining in, support others safely, preserve evidence where appropriate and tell an adult if they see, hear or experience bullying. Responsibility for stopping bullying remains with adults and the organisation, not with the child who is harmed.

7. Prevention and proactive practice

Lighthouse will use whole-setting and individual approaches, including:

- a calm, predictable environment with clear expectations of safe, kind and respectful behaviour;
- strong relationships between adults and learners and access to trusted adults;
- careful matching, grouping, timetabling and supervision based on individual risk;
- induction for learners about reporting routes, online conduct, consent and boundaries;
- emotional literacy, communication, empathy, identity, consent, online safety, conflict resolution and relationship education;
- planned opportunities for learner voice, check-ins, nurture time and private conversations;
- reasonable adjustments, communication support and sensory/environmental planning;
- staff training in bullying, discrimination, child-on-child abuse, SEND vulnerability and online harm;
- active supervision of transition times, transport, community activity, shared spaces and digital access;
- review of previous incidents, known peer dynamics and information supplied by commissioners;
- participation in appropriate anti-bullying awareness activities while ensuring prevention is continuous rather than limited to an annual event; and
- work with schools, families and community partners where risks arise beyond the Lighthouse site.

8. Learner voice and ways to report

8.1 A learner may report bullying to any adult at Lighthouse, the DSL or Deputy DSL, a parent or carer, their home-school DSL, commissioner, social worker or another trusted professional. The learner does not have to follow a hierarchy.

8.2 Reports may be verbal, written, drawn, communicated through symbols or assistive communication, sent through an agreed digital route, made through an advocate or raised during a check-in. Anonymous information will be considered, although it may limit the ability to provide feedback or investigate fully.

8.3 Adults will explain that information cannot always be kept secret, but it will be shared only with people who need it to protect the child and address the concern. The learner will be told what will happen next in language they understand.

8.4 A child who reports bullying will never be told simply to ignore it, toughen up, change who they are, avoid all shared spaces or resolve it alone.

9. Immediate response to a bullying concern

Immediate response

> Listen and establish safety. Separate children where needed without presenting separation as punishment. Address injury or urgent distress. Preserve evidence. Record what was seen, heard or reported. Inform the Provision Lead and DSL where safeguarding may be involved. Notify the home school or commissioner through the agreed route.

9.1 The adult receiving or witnessing the concern will:

- remain calm and take the concern seriously;
- check immediate physical, emotional and online safety;
- listen separately to the children involved and avoid public questioning;
- not promise secrecy or begin an extensive investigation in front of others;
- record the child's words, observed behaviour, dates, locations, witnesses and any pattern;
- secure screenshots, messages or devices where appropriate without copying sexual images of children;
- inform the session leader or Provision Lead promptly and the DSL immediately where required;
- agree immediate support, supervision, contact and transport arrangements; and
- inform parents, carers and the commissioner as set out in section 21.

9.2 The initial approach should be calm and non-accusatory so that facts and needs can be understood. This is not a "no-consequence" response and does not prevent clear accountability once the concern has been assessed.

10. Safeguarding threshold and urgent escalation

10.1 Bullying may be a safeguarding matter. The Safeguarding and Child Protection Policy takes priority where the concern involves or may involve:

- serious violence, injury, threats with weapons or credible threats of significant harm;
- sexual violence, sexual harassment, harmful sexual behaviour or sharing nude or semi-nude images;
- criminal or sexual exploitation, coercion, extortion, trafficking, county lines or forced activity;
- repeated or severe discriminatory abuse causing significant distress or danger;
- suicidal thoughts, self-harm, severe mental-health deterioration or fear of attending;
- an adult harming, intimidating, grooming or abusing a child;
- a pattern suggesting significant emotional abuse or neglect; or
- a suspected crime or immediate danger.

10.2 Immediate danger or a crime in progress: call 999. Any adult may make a direct referral. Internal procedure, uncertainty about labels or waiting for commissioner agreement must not delay protection.

10.3 Where the concern is safeguarding-related, the DSL will record the rationale, notify the home-school DSL or commissioner without delay and use Suffolk or Norfolk safeguarding routes as appropriate.

11. Assessment, investigation and decision-making

11.1 Investigation must be proportionate, timely, impartial and sensitive to safeguarding. The investigator will consider:

- what happened, where, when, how often and who was present;
- the child's experience, impact, wishes and immediate needs;
- whether there is repetition, intent or a power imbalance;
- age, development, SEND, communication, trauma, vulnerability and group dynamics;
- online evidence, previous incidents, attendance changes and contextual risks;
- whether any behaviour may be discriminatory, sexual, exploitative, criminal or abusive;
- the accounts of all relevant children and adults, gathered separately where appropriate; and
- what action is required to prevent recurrence and restore safe participation.

11.2 Staff will not require a child to confront another child, take part in mediation or repeat an account unnecessarily. The standard of proof for an internal policy decision is the reasonable assessment of available information, but uncertainty must be acknowledged and safeguarding thresholds applied cautiously.

11.3 Outcomes may be recorded as substantiated, partly substantiated, unsubstantiated because evidence is insufficient, or not bullying but another behaviour or safeguarding concern. "Unsubstantiated" does not mean the report was false or malicious.

11.4 The investigator will prepare an action plan with responsibilities and review dates. The focus is not only on what happened but on what must change in the child, peer group, environment, staffing, supervision, curriculum or placement arrangements.

12. Support for the harmed learner

Support will be individualised and may include:

- a named trusted adult and regular private check-ins;
- immediate separation or changes to grouping, transport, timetable, online access or shared spaces;
- a written safety and support plan developed with the learner;
- communication support, advocacy and reasonable adjustments;
- emotional-regulation, therapeutic or pastoral support within Lighthouse's competence;

- support to preserve evidence, block contact and use reporting tools online;
- medical attention or referral to specialist, safeguarding or mental-health services;
- clear information about actions taken and how to report recurrence;
- support with attendance, re-engagement and rebuilding confidence; and
- review with the home school, commissioner and family.

12.2 The harmed learner will not be made responsible for preventing further bullying by giving up valued activities, changing identity or accepting unwanted contact. Temporary changes may be necessary for safety but will be reviewed and explained.

13. Work with the learner displaying bullying behaviour

13.1 The learner will be clearly told which behaviour is unacceptable, the impact and the required change. Staff will remain respectful and avoid humiliation, public shaming or labels such as “bully” as a fixed identity.

13.2 Work may include:

- individual discussion after the learner is regulated and able to engage;
- assessment of motivation, unmet need, trauma, communication, social understanding, peer status and safeguarding vulnerability;
- explicit teaching of empathy, consent, boundaries, communication and online conduct;
- a behaviour support or risk-management plan with measurable expectations;
- increased supervision, structured activity or temporary restrictions;
- proportionate consequences linked to safety, accountability, learning and repair;
- family and commissioner involvement;
- specialist or safeguarding referral where behaviour is sexual, exploitative, violent or persistent; and
- frequent review until change is sustained.

13.3 A child who harms others may also be experiencing abuse, exploitation, discrimination or unmet need. This possibility must be assessed without reducing protection for the harmed child or excusing the behaviour.

14. Witnesses, bystanders and group dynamics

14.1 Witnesses and bystanders can reinforce bullying by laughing, sharing content, remaining silent, excluding the harmed child or rewarding status. They can also interrupt harm by seeking help, refusing to join in and supporting the child safely.

14.2 Staff will speak to witnesses separately, protect them from retaliation and avoid blaming a child who was frightened or unsure how to act. Education and support will help learners identify safe options: tell an adult, do not forward content, offer support, record relevant information and move away from escalating situations.

14.3 Where bullying is group-based, intervention will address the whole peer culture, supervision arrangements and social rewards rather than focusing only on one child.

15. Restorative and relationship-repair approaches

15.1 Lighthouse values restorative practice, but restorative meetings are not automatically suitable. They must be voluntary, carefully prepared, facilitated by a competent adult and assessed as safe for the harmed learner.

15.2 Restorative work may include acknowledging impact, answering safe questions, agreeing boundaries, replacing or repairing property, correcting misinformation, making an appropriate apology and identifying future behaviour.

15.3 Face-to-face work will not be used where there is coercion, sexual violence, significant power imbalance, ongoing intimidation, fear, risk of retaliation, denial that prevents safe engagement or statutory advice against contact. The harmed child is never required to forgive, accept an apology or resume a relationship.

16. Prejudice-related and discriminatory bullying

16.1 Lighthouse will challenge bullying and harassment connected with actual or perceived disability, race, colour, nationality, ethnic or national origin, religion or belief, sex, sexual orientation, gender reassignment, pregnancy or maternity, age where relevant, care experience, appearance, family circumstances or another identity or association.

16.2 Discriminatory incidents will be recorded clearly, not disguised as ordinary conflict. The response will consider the impact on the individual, wider group and culture; whether reasonable adjustments were absent; whether specialist advice is needed; and whether the concern meets safeguarding, complaints or legal-reporting thresholds.

16.3 Adults must challenge discriminatory language even where the targeted child is not present or says they are not upset. Education, consequence and support will be proportionate to age, understanding, repetition and impact.

17. SEND, communication and neurodivergence

17.1 Learners with SEND or health conditions may be more vulnerable to bullying and may communicate harm through behaviour, withdrawal, dysregulation, attendance change, physical symptoms or loss of skills rather than a clear verbal report.

17.2 Staff will:

- avoid assuming distress, injury or behaviour is simply part of a diagnosis;
- use the learner's preferred communication method and allow processing time;
- make reasonable adjustments to reporting, investigation and support;
- consider sensory, social, cognitive and language differences when assessing intent and impact;
- teach social understanding explicitly without blaming the child for being targeted;
- protect confidential information about disability or diagnosis; and
- review whether staffing, environment, transitions or group composition increase vulnerability.

17.3 A communication misunderstanding may require teaching and repair, but repeated harmful behaviour after clear support and explanation still requires action.

18. Online, community, transport and off-site bullying

18.1 Lighthouse will respond where off-site or online behaviour affects a learner's safety, wellbeing, relationships, attendance or ability to access provision, even if the behaviour did not begin on Lighthouse premises.

18.2 Staff will preserve relevant evidence, avoid asking children or adults to forward sexual or highly harmful content, use authorised reporting routes and involve the home school, commissioner, platform, police or safeguarding services as appropriate.

18.3 Risk controls may include supervised device use, revised transport or handover arrangements, blocking or reporting accounts, changes to group access, adult proximity, digital-safety education and a plan for safe return to shared activities.

18.4 Staff must not create unofficial group chats with learners or use personal social-media accounts. Concerns involving staff devices or online conduct are reported under safeguarding and conduct procedures.

19. Sexual bullying, sexual harassment and harmful sexual behaviour

19.1 Sexual comments, rumours, unwanted sexual attention, coercion, image sharing, sexualised insults, touching, pressure, upskirting, abuse within intimate relationships and other harmful sexual behaviour are not treated as ordinary bullying alone.

19.2 The DSL will assess the concern under the Safeguarding and Child Protection Policy, protect the harmed child, preserve evidence, inform the commissioner and consult police, children's social care or specialist services where appropriate.

19.3 Staff must not use mediation or restorative meetings as an immediate response to sexual violence or coercive sexual behaviour. Support and risk assessment for both children will be separate and child-centred.

20. Concerns involving adults

20.1 Any allegation that an adult has bullied, humiliated, intimidated, discriminated against, harassed or otherwise harmed a child must be reported immediately to the DSL or a Director who is not the subject of the concern. The allegations or low-level concerns procedure will be followed, including LADO consultation where the threshold may be met.

20.2 A learner's harmful or intimidating behaviour towards an adult will be addressed through behaviour, risk, safeguarding and health-and-safety arrangements. Staff safety matters, but a child must not be labelled or excluded without considering need, context, proportionality and commissioner responsibilities.

20.3 Bullying or harassment between adults is addressed through the Staff Code of Conduct, complaints, grievance, whistleblowing, contractual and health-and-safety arrangements. It will also be treated as a safeguarding concern where it affects children or creates an unsafe culture.

21. Parents, carers, schools and commissioners

21.1 Parents, carers and the commissioning school or Local Authority will normally be informed without delay when bullying is substantiated or when immediate safety action is required. Serious concerns may be notified while investigation is continuing.

21.2 Communication will be factual and protect the privacy of other children. Lighthouse cannot disclose another child's personal, safeguarding or disciplinary information, but will explain the action taken to protect the complainant and manage risk.

21.3 The commissioner will receive the concern record and follow-up information through the agreed placement route where appropriate and lawful. Communication will continue until the matter is resolved or transferred to a safeguarding, criminal or formal complaints process.

21.4 Families and commissioners are expected to share relevant information, support agreed safety plans and avoid direct confrontation between children or families. Disagreement about the response may be raised through the Complaints Policy without delaying protective action.

22. Consequences, placement safety and exclusionary decisions

22.1 Consequences will be proportionate, individualised and linked to safety, accountability, learning and repair. They may include restrictions, increased supervision, loss of a specific privilege, adjusted activities, separate transport, behaviour agreements, additional support or commissioner review.

22.2 Continuing or serious bullying may require a temporary pause, different staffing or grouping, a multi-agency review or a decision that Lighthouse cannot safely meet the placement. Ending or changing a placement is a last-resort safety decision, not a simple punishment, and must be discussed urgently with the commissioner so that the child's education and safeguarding responsibilities remain clear.

22.3 Lighthouse will not use informal exclusion, send a child home solely to avoid recording an incident or pressure a family to withdraw. Any emergency collection or placement pause must be documented, risk based and communicated to the commissioner.

23. Recording, monitoring and quality assurance

23.1 All bullying concerns will be recorded promptly, including reports that are not ultimately classified as bullying. Records will include:

- the child's words, observations, dates, locations and people involved;
- immediate safety action and safeguarding decisions;
- contact with parents, carers, school, commissioner and agencies;
- investigation evidence and outcome;
- support, consequence, risk controls and restorative action;
- review dates, learner feedback and closure decision; and
- links to previous incidents or emerging patterns.

23.2 Records will be stored securely and shared only on a need-to-know basis. Bullying, incident and safeguarding records will be cross-referenced where appropriate.

23.3 Directors and the Provision Lead will review data at least termly for patterns involving particular children, groups, locations, times, transport, online spaces, protected characteristics, staff response and repeat behaviour. Action will be tracked to completion.

23.4 Quality assurance will consider whether concerns were reported promptly, children felt heard, safeguards were effective, behaviour changed, families and commissioners were informed and any environmental or organisational cause was addressed.

24. Complaints, escalation and review

24.1 A learner, parent, carer or commissioner who believes a bullying concern has not been handled appropriately may use the Lighthouse Complaints Policy. A complaint may be made directly to a Director where the concern involves the Provision Lead or where informal resolution would be inappropriate.

24.2 Staff who believe concerns are being ignored, minimised or concealed must escalate to a Director, commissioner, DSL, Local Authority safeguarding service, LADO, police or the NSPCC Whistleblowing Advice Line according to the circumstances.

24.3 This policy will be reviewed at least annually and sooner after a serious incident, complaint, safeguarding review, repeated pattern, commissioner requirement or material change in legislation, guidance or operating arrangements.

25. Reference framework

External framework and guidance

Department for Education Preventing and tackling bullying guidance; Keeping Children Safe in Education 2025 and 2026 provisions on child-on-child abuse, online safety and sexual harm; Working Together to Safeguard Children 2026; Non-school alternative provision voluntary national standards; Equality Act 2010; Human Rights Act 1998; UK Council for Internet Safety guidance; and Norfolk and Suffolk safeguarding partnership procedures. These sources are applied according to Lighthouse's legal status and activities.

External guidance checked 20 July 2026. Current official guidance and local procedures take precedence if a source changes.