



Anti Bullying and Peer-on-Peer Abuse Policy (Alternative Provision)

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Version History

Version No.	Author/Editor	Approved by	Date Issued	Next Review Date	Brief Summary of Changes
1	Lorraine Miranda	Rhea Marwaha	15.04.2026	13.04.2029	New Policy

Executive Summary

This Anti-Bullying and Peer-on-Peer Abuse Policy sets out how Nova Newcastle Ltd Alternative Provision creates, maintains, and protects a safe, inclusive, and respectful learning environment for all pupils.

Nova Newcastle Ltd recognises that pupils attending Alternative Provision may be at increased vulnerability to bullying due to prior trauma, exclusion, unmet SEND needs, mental health challenges, or disrupted education. Bullying behaviour, including peer-on-peer abuse, is therefore treated as a safeguarding concern and addressed through early intervention, education, and restorative practice.

This policy is aligned with:

- Keeping Children Safe in Education (current edition)
- Working Together to Safeguard Children
- The Education Inspection Framework
- The Equality Act 2010
- Behaviour in Schools Guidance
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Nova Newcastle Ltd operates a **zero-tolerance approach to bullying**, harassment, discrimination, and victimisation. All staff share responsibility for prevention, identification, reporting, and response.

A pupil-friendly summary of this policy is available through induction materials and ongoing pastoral sessions.

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1.0 Purpose and Scope

Nova Newcastle Ltd Alternative Provision is committed to creating and maintaining an emotionally and physically safe learning environment where all pupils are treated with dignity, respect and fairness. Bullying, harassment, discrimination and victimisation are not tolerated and will be addressed promptly, consistently and proportionately.

Purpose

The aims of this policy are to ensure that all staff:

- Understand what bullying is, how it presents, and how to respond effectively
- Work proactively to prevent bullying through a culture of safe, respectful relationships
- Support pupils to feel confident in reporting concerns and to know they will be taken seriously
- Provide appropriate support to pupils who are impacted by bullying (including emotional and therapeutic support where required)
- Address bullying behaviour through education, boundaries, restorative approaches and, where necessary, behavioural consequences
- Work with parents/carers and multi-agency partners to safeguard pupils and reduce risk

Scope

This policy applies to:

- All pupils on roll (including those attending part-time, on a short-term placement, dual registered, or accessing outreach/alternative packages)
- All staff, agency staff, volunteers, contractors and visitors
- All provision activities on-site, off-site, during transport arrangements, and online/digital spaces linked to Nova Newcastle Ltd
- Bullying that occurs outside the setting where it impacts a pupil's safety, wellbeing, attendance, engagement or relationships within the provision (including online bullying)

What bullying is

Bullying is behaviour that is deliberately hurtful, repeated (or likely to be repeated) and involves a real or perceived imbalance of power, making it difficult for the pupil experiencing it to defend themselves. Bullying can happen:

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- **Verbally** (name-calling, threats, humiliation, racist/sexist/homophobic language)
- **Physically** (pushing, hitting, damage to belongings)
- **Emotionally/psychologically** (intimidation, coercion, manipulation)
- **Relationally/socially** (exclusion, isolation, rumour-spreading)
- **Online** (cyberbullying via messaging, social media, images, video, group chats, gaming platforms)

Bullying and safeguarding

Bullying can be a safeguarding issue and, in some circumstances, may constitute peer-on-peer abuse. Where bullying results in significant distress, repeated targeting, humiliation, threats, coercion, sexualised behaviour, discriminatory harassment, or a pattern indicating risk of harm, it must be treated as a safeguarding concern.

All staff must:

- Record concerns factually and promptly in line with the provision's recording procedures
- Share concerns without delay with the Designated Safeguarding Lead (DSL) (or Deputy DSL)
- Follow the Safeguarding Policy and local safeguarding procedures where thresholds are met, including multi-agency working when required

Our culture

Nova Newcastle Ltd expects all staff to contribute to a culture of:

- mutual respect and empathy
- inclusion and belonging
- fairness and consistency
- positive conflict resolution
- accountability and repair (restorative practice), alongside clear boundaries

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2.0 Recognising the Signs and Indicators of Bullying

Bullying does not always present through direct disclosure. Pupils may show changes in behaviour, emotional presentation, attendance, engagement or physical wellbeing. Staff must remain professionally curious and responsive to emerging patterns, recognising that bullying may be a contributory factor even where it has not been explicitly reported.

All staff should be alert to both indicators that a pupil may be experiencing bullying and indicators that a pupil may be bullying others.

Indicators that a pupil may be experiencing bullying

Physical indicators

- Unexplained injuries or repeated minor injuries
- Damage to clothing, equipment or personal belongings
- Frequent complaints of headaches, stomach aches or feeling unwell
- Changes in eating patterns (skipping meals, binge eating)
- Sleep disturbance, nightmares or exhaustion during the day
- Self-harming behaviours or risk-taking behaviour

Behavioural indicators

- Decline in attendance, punctuality or engagement
- Sudden deterioration in academic participation or motivation
- Withdrawal from peers or avoidance of specific pupils or situations
- Reluctance to attend certain lessons, activities or parts of the day
- Increased anxiety around transitions or unstructured times
- Avoidance of online platforms or, conversely, excessive online use

Emotional and psychological indicators

- Low mood, tearfulness, irritability or emotional dysregulation
- Increased anxiety, fearfulness or hypervigilance
- Loss of confidence or self-esteem
- Excessive compliance or people-pleasing behaviour
- Aggressive outbursts, emotional shutdown or dissociation

Serious safeguarding indicators

- Disclosure or evidence of self-harm or suicidal ideation
- Substance misuse or exploitation concerns
- Sexualised behaviour that is developmentally inappropriate

Where these indicators are present, staff must consider whether bullying or peer-on-peer abuse may be a contributing factor and respond in line with safeguarding procedures.

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Indicators that a pupil may be bullying others

A pupil engaging in bullying behaviour may present with:

- Frequent involvement in verbal or physical conflict
- Use of threats, intimidation or controlling behaviour
- Deliberate damage to others' belongings
- Persistent exclusion or isolation of peers
- Blaming others or refusing to take responsibility
- Heightened concern with reputation, dominance or peer status
- Acquisition of unexplained money or possessions

Understanding why bullying behaviour may occur

Bullying behaviour is often rooted in unmet need. Pupils may engage in bullying as a way of coping with:

- Fear, insecurity or low self-worth
- Exposure to violence, abuse or coercive relationships
- Being bullied themselves
- Trauma, loss or instability
- A perceived lack of control in their own lives
- Social pressure or a desire for acceptance

Understanding *why* behaviour is occurring enables staff to respond in a way that is protective, restorative and educative rather than purely punitive.

Recording and sharing concerns

Where indicators of bullying are observed:

- Staff must record concerns factually on the provision's behaviour and/or safeguarding recording system on the same day
- Concerns must be shared promptly with the **Designated Safeguarding Lead (DSL)** or Deputy DSL
- Low-level concerns must be logged and reviewed for patterns or escalation

No concern is too small. Patterns often emerge through professional curiosity and shared information.

3.0 Preventing Bullying and Promoting Positive Relationships

Prevention of bullying at Nova Newcastle Ltd Alternative Provision is rooted in a culture of emotional safety, trust, consistency and respectful relationships. All staff share responsibility

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for creating an environment where pupils feel safe, valued and supported to engage positively with learning and peers.

Nova Newcastle Ltd recognises its duty to act in accordance with safeguarding procedures and to take early, proportionate action where bullying or peer-on-peer abuse is suspected.

Creating a Positive and Inclusive Culture

Nova Newcastle Ltd is committed to ensuring that pupils receive equal protection from all forms of harm, regardless of age, disability, special educational need, gender, race, religion or belief, sexual orientation or gender identity.

We aim to ensure that pupils:

- Feel able to express fears, worries and concerns safely
- Are listened to and taken seriously
- Feel respected within a network of trusted relationships
- Experience positive leadership and clear boundaries
- Are supported by vigilant, compassionate and consistent staff

Pupil participation and feedback are actively encouraged and evidenced through group discussions, mentoring sessions, and structured opportunities for pupil voice.

Staff Training and Development

All staff at Nova Newcastle Ltd:

- Receive safeguarding and peer-on-peer abuse training in line with Keeping Children Safe in Education
- Are trained to recognise signs of vulnerability, exploitation and bullying
- Understand disclosure, recording and referral processes
- Receive regular supervision, reflective practice opportunities and team briefings

Refresher training in anti-bullying and online safety is provided at least annually. Training completion is monitored and recorded to ensure compliance and consistency.

Education, Awareness and Skill-Building

Pupils are supported to understand bullying through:

- PSHE / RSHE sessions
- One-to-one mentoring and pastoral support

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- Group work, social stories and role-play
- Targeted workshops and themed awareness activities

Education focuses on empathy, kindness, inclusion, emotional regulation, respectful communication, consent, boundaries and the impact of behaviour on others.

Appropriate online resources and support platforms may be used to reinforce learning, including Childline, the Anti-Bullying Alliance and age-appropriate digital safety materials.

Supervision and Environment

Bullying may occur in any setting, including during unstructured times or online. Staff must remain vigilant and ensure appropriate supervision:

- On-site and off-site
- During transitions and breaks
- In online or blended learning environments

Clear expectations regarding supervision and professional boundaries are outlined in staff induction materials and reinforced through ongoing training.

Structured Routines and Predictability

Structured routines, clear expectations and purposeful activities are used to reduce opportunities for bullying and support emotional regulation. Activities are planned with consideration to pupils' needs, interests and risk factors.

Behaviour Support and Risk Management

Where a pupil is identified as being involved in bullying behaviour, either as a victim or alleged perpetrator:

- Relevant information will be reflected in behaviour support plans and risk assessments
- Staff are expected to familiarise themselves with these documents
- Plans are reviewed and updated promptly where new information emerges

Any changes are communicated clearly to staff to ensure consistent support and supervision.

Working in Partnership

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Nova Newcastle Ltd works collaboratively with parents/carers, schools, local authorities and external agencies to prevent and address bullying. Information gathered during admission or transition regarding previous bullying experiences is considered when planning support and risk management.

Multi-agency input is sought where appropriate to ensure pupils receive the right support at the right time.

3.1 Procedures for Addressing Bullying and Peer – on – Peer Abuse

Nova Newcastle Ltd Alternative Provision encourages all pupils to report bullying concerns to **any member of staff they trust**. Pupils are reassured that they will be listened to, taken seriously, and supported.

When a concern or allegation of bullying is identified, staff must follow the procedures below to ensure a consistent, proportionate and safeguarding-focused response.

Initial Response

Any member of staff who:

- witnesses bullying behaviour, or
- receives a disclosure or concern

must:

- take the concern seriously
- prioritise the immediate safety and wellbeing of all pupils involved
- respond calmly, reassuringly and without judgement
- avoid making promises of confidentiality

Where necessary, pupils should be separated to prevent further harm.

Recording and Reporting

The staff member must:

- record the concern factually and promptly on the provision's safeguarding and/or behaviour recording system on the same day
- include details of those involved, witnesses (if any), and immediate actions taken
- share the concern without delay with the Designated Safeguarding Lead (DSL) or Deputy DSL

Staff must record facts only and avoid assumptions, opinions or leading language.

Assessment and Decision-Making

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The DSL (or Deputy DSL) will:

- review the information gathered
- assess whether the concern meets the threshold for safeguarding or peer-on-peer abuse
- determine next steps, which may include further investigation, behaviour management strategies, restorative approaches, or referral to external agencies

Where patterns or repeated incidents are identified, this must be treated as an escalating concern.

Supporting Pupils Involved

Staff will ensure that:

- pupils who have experienced bullying are listened to and supported using a trauma-informed, non-blaming approach
- pupils displaying bullying behaviour are supported to understand the impact of their actions and given clear expectations for change

Pupils will not be told to “ignore” bullying or manage it alone.

Restorative Practice

Where appropriate and safe to do so, restorative approaches may be used to:

- help pupils reflect on their behaviour
- repair harm
- rebuild relationships
- agree clear actions to prevent recurrence

Restorative work is always voluntary, pupil-centred and supervised by staff.

Follow-Up and Review

Staff and leaders must:

- monitor the situation to ensure bullying has not resumed
- check in regularly with pupils involved
- review behaviour support plans or risk assessments where relevant

Follow-up must take place for a minimum of four weeks, or longer where concerns persist.

3.2 Staff Addressing Bullying

All staff at Nova Newcastle Ltd Alternative Provision have a responsibility to actively promote a safe learning environment and to take appropriate action where bullying or peer-on-peer abuse is suspected or identified.

Staff must never ignore bullying behaviour or assume that it will resolve itself.

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Recognising and Responding

If a member of staff:

- witnesses bullying behaviour, or
- becomes aware of a concern through disclosure, observation or third-party information

they must respond promptly and appropriately.

Staff must:

- remain calm and professional
- reassure pupils involved
- avoid confrontation, judgement or blame
- avoid asking leading or investigative questions

The immediate focus must always be on safety and emotional containment.

Monitoring and Information-Gathering

Staff should:

- observe behaviour over time for patterns or escalation
- note changes in engagement, attendance or emotional presentation
- share emerging concerns promptly rather than waiting for confirmation

Staff must not conduct informal “investigations” independently or attempt to resolve serious concerns without leadership oversight.

Recording and Reporting

All concerns must be:

- recorded factually and accurately on the safeguarding and/or behaviour recording system on the same day
- shared without delay with the **Designated Safeguarding Lead (DSL)** or Deputy DSL

Records must clearly distinguish between:

- what was observed
- what was reported
- actions taken

Opinion, assumption or emotive language must be avoided.

Supporting Pupils

Staff should:

- listen carefully to pupils who report bullying
- reassure them that concerns are being taken seriously
- ensure they are not isolated or blamed

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Where a pupil is alleged to have bullied others, staff should:

- address behaviour calmly and respectfully
- support reflection on impact
- reinforce clear expectations for behaviour

Staff must not shame, label or humiliate pupils.

Restorative and Preventative Approaches

Where appropriate and safe, staff may support restorative approaches under the guidance of senior staff to:

- repair relationships
- rebuild trust
- prevent recurrence

Restorative work must be:

- proportionate
- voluntary
- supervised
- focused on accountability and learning

Ongoing Oversight

Staff must:

- continue to monitor pupils involved
- report any further concerns or recurrence immediately
- contribute to review of behaviour support plans or risk assessments where required

Follow-up is essential to ensure bullying has genuinely stopped.

3.3 Recording and Documentation Requirements

Accurate, timely and factual recording is essential to ensure bullying concerns are managed safely, consistently and effectively.

All records relating to bullying or peer-on-peer abuse must be completed in line with the provision's Safeguarding Policy, Behaviour Policy and information governance requirements.

Required Records

Where bullying concerns arise, staff may be required to complete and contribute to the following records, as appropriate:

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- **Safeguarding concern records**
Used where bullying may meet safeguarding or peer-on-peer abuse thresholds, or where a pupil is experiencing significant distress or harm.
- **Behaviour incident records**
Used to document observed behaviour, immediate responses, and patterns of concern.
- **Restorative practice records**
Used to evidence restorative conversations, mediation, reflection and agreed actions between pupils.
- **Behaviour support plans and/or risk assessments**
Updated where bullying behaviour or victimisation indicates increased risk or need for targeted support.

Recording Standards

All records must:

- be completed as soon as practicable and no later than the same working day
- be factual, clear and objective
- distinguish between observation, disclosure and professional judgement
- record actions taken and by whom
- be signed, dated and stored securely

Speculative language, assumptions or emotive terminology must be avoided.

Oversight and Review

The Designated Safeguarding Lead (DSL) or Deputy DSL is responsible for:

- reviewing bullying-related records
- identifying emerging patterns or escalation
- ensuring appropriate actions are taken
- confirming whether concerns meet safeguarding thresholds

Records may be reviewed collectively to support professional curiosity, triangulation and early intervention.

Information Sharing

Relevant information will be shared with:

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- staff who need to know in order to safeguard pupils
- parents/carers where appropriate and safe
- external agencies where safeguarding thresholds are met

Information sharing will always be proportionate and in line with statutory guidance.

3.4 Leadership Responsibilities When Addressing Bullying

The Designated Safeguarding Lead (DSL), supported by the Deputy DSL and senior leaders, holds overall responsibility for ensuring that bullying and peer-on-peer abuse concerns are managed safely, consistently and in line with statutory safeguarding guidance.

Leadership Oversight

When a bullying concern is reported, the DSL or Deputy DSL will:

- review all available information and records
- assess the level of risk and safeguarding threshold
- determine appropriate next steps and interventions
- ensure that staff are supported and guided in their response

Leaders must take a coordinated and child-centred approach, ensuring that actions are proportionate, timely and focused on safety and wellbeing.

Review of Risk and Support Plans

Where bullying concerns are identified, the DSL will ensure that:

- relevant behaviour support plans and/or risk assessments are updated to reflect new information
- protective and preventative measures are clearly documented
- expectations for staff supervision and support are explicit

Updated plans must be communicated promptly to staff who require the information to safeguard pupils effectively.

Safeguarding Thresholds and Escalation

Where bullying behaviour:

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- is repeated or escalating
- results in significant emotional or physical harm
- involves coercion, threats, sexualised behaviour or exploitation
- raises concerns about peer-on-peer abuse

the DSL must manage the concern in line with the Safeguarding Policy and local safeguarding procedures, including referral to children’s social care where thresholds are met.

Multi-Agency Working

The DSL will liaise with:

- parents/carers (where appropriate and safe)
- local authority safeguarding teams
- education partners
- health, mental health or therapeutic services

to ensure a coordinated response and appropriate support for all pupils involved.

Police Involvement

Bullying behaviour does not automatically constitute a criminal offence. Nova Newcastle Ltd is committed to minimising unnecessary criminalisation of children and young people.

Decisions regarding police involvement will be made by senior leaders and the DSL, based on:

- the nature and seriousness of the behaviour
- risk to others
- safeguarding advice and statutory guidance

Where police involvement is required, appropriate notifications, recording and safeguarding actions will be completed.

Responding to External Complaints or Concerns

Where bullying concerns are raised by external professionals or agencies:

- these will be reviewed by senior leadership and the DSL
- safeguarding and complaints procedures will be followed as appropriate
- outcomes and actions will be clearly recorded

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3.5 Addressing Bullying, Harassment or Intimidation Amongst Staff

Nova Newcastle Ltd Alternative Provision is committed to promoting a professional, respectful and inclusive working environment. Bullying, harassment or intimidation between staff is not tolerated and will be addressed promptly and fairly.

Bullying amongst staff may take many forms and can relate to personal interactions or work-related activities. Nova Newcastle Ltd recognises that reasonable and constructive performance management does not, in itself, constitute bullying. However, there are clear behaviours that are unacceptable.

Examples of Unacceptable Behaviour

Examples may include, but are not limited to:

- Deliberately excluding or isolating a colleague without justification
- Overbearing, intimidating or abusive supervision
- Spreading malicious rumours, gossip or making derogatory remarks
- Undermining a colleague's professional competence
- Setting unachievable or meaningless tasks to cause distress
- Persistent and unjustified criticism or micromanagement
- Misuse of power or position
- Threats relating to job security without foundation
- Blocking access to training, development or progression opportunities

Such behaviour may relate to protected characteristics under the Equality Act 2010 or may occur independently of them.

Raising Concerns

Any member of staff who experiences or witnesses bullying behaviour may raise concerns through:

- the Grievance Procedure
- the Complaints Procedure
- the Whistleblowing Policy (where appropriate)

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Staff are encouraged to raise concerns early. No staff member will be treated less favourably for raising a genuine concern in good faith.

Leadership Response and Investigation

Concerns will be managed by an appropriate senior leader, HR representative or external professional where necessary, ensuring:

- impartiality
- confidentiality
- fairness

The process may include:

- fact-finding meetings
- supervision discussions with those involved
- review of relevant evidence

Individuals involved will be given the opportunity to present their account. All matters will be handled sensitively and in line with employment law and internal policies.

Restorative and Informal Resolution

Where appropriate and with agreement from those involved, restorative or informal approaches may be used to:

- address misunderstandings
- rebuild professional relationships
- agree clear expectations moving forward

Restorative approaches are not appropriate where behaviour is serious, repeated or abusive.

Formal Action

Where behaviour meets the threshold for formal action:

- disciplinary procedures will be followed
- appropriate sanctions may be applied

Outcomes will be proportionate to the findings and recorded appropriately.

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Follow-Up and Culture Review

Leaders will:

- monitor the situation to ensure issues have been resolved
- provide support where required
- review team dynamics or leadership practice where patterns emerge

Where a pattern of bullying or intimidation is identified, senior leadership will reflect on organisational culture and oversight to ensure learning and improvement.

4.0 Examples of Bullying and Peer – on – Peer Abuse

The following scenarios are **illustrative examples** designed to support staff and pupils in recognising bullying and peer-on-peer abuse. They are not exhaustive and bullying may present in many other ways depending on context, relationships and individual vulnerabilities.

Example 1: In the Provision Setting

A pupil newly attending the provision has a speech difficulty. Other pupils begin to mimic the pupil's speech, use derogatory language and exclude them from group activities. Despite clear signs of distress, the behaviour continues over time. The pupil begins to withdraw from shared spaces, avoids group learning and shows reduced engagement.

This behaviour constitutes bullying due to its repetitive nature, power imbalance and emotional harm.

Example 2: Education and Social Exclusion

A pupil joins the provision part-way through the academic year. Attempts to form friendships are met with deliberate exclusion by a peer group. False rumours are shared, leading others to distance themselves. The pupil becomes increasingly isolated, shows a decline in confidence and participation, and displays emotional distress.

This behaviour may involve relational bullying and should be addressed promptly to prevent escalation.

Example 3: Online Bullying and Digital Harm

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A pupil becomes aware that peers have created a group chat where altered images of them are shared alongside humiliating comments. Others are encouraged to participate. Although the behaviour occurs online and outside the physical setting, it impacts the pupil's emotional wellbeing, confidence and ability to engage in education.

Online bullying linked to pupils within the provision must be treated as seriously as in-person bullying.

5.0 Bullying and Banter

Nova Newcastle Ltd Alternative Provision recognises that there is an important distinction between friendly banter and bullying. However, this distinction must always be assessed carefully, with particular attention to impact, power and consent.

What is Banter?

Banter may be described as:

- light-hearted, mutual and non-threatening
- welcomed by all parties involved
- occurring between individuals of relatively equal power
- leaving those involved feeling comfortable, included or amused

Banter is situational and should stop immediately if any individual expresses discomfort.

When Banter Becomes Bullying

Behaviour may constitute bullying where:

- it causes distress, humiliation or fear
- it continues after a pupil has indicated discomfort
- there is a real or perceived imbalance of power
- it targets personal characteristics, vulnerabilities or protected characteristics
- it is repeated or likely to be repeated

Staff must not dismiss harmful behaviour as “just banter” where a pupil feels uncomfortable, upset or intimidated.

Staff Expectations

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Staff must:

- challenge inappropriate language or behaviour immediately
- model respectful communication
- reinforce boundaries consistently
- support pupils to understand the impact of their words and actions

Where there is uncertainty, staff must err on the side of safeguarding and report concerns for further assessment.

6.0 The impacts and Effects of Bullying

Bullying can have a profound and lasting impact on pupils' emotional wellbeing, mental health, self-esteem and ability to engage in education. For pupils attending Alternative Provision, who may already have experienced trauma, exclusion or disrupted relationships, the impact of bullying can be particularly significant.

Potential Effects on Pupils

The effects of bullying may include:

- Increased anxiety, stress or low mood
- Loss of confidence and self-worth
- Social withdrawal and isolation
- Difficulties forming and maintaining healthy relationships
- Reduced engagement with learning and attendance
- Heightened vulnerability to exploitation or further harm
- Long-term emotional or psychological trauma

Staff must remain alert to these indicators and take early action to prevent escalation.

Safeguarding and Emotional Harm

Bullying may constitute emotional abuse and, in some cases, peer-on-peer abuse. Where bullying results in sustained distress, humiliation, fear or coercion, it must be managed as a safeguarding concern.

Staff are expected to:

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- promote open communication
- encourage pupils to share concerns
- respond promptly and appropriately to disclosures
- follow safeguarding procedures where thresholds are met

Online Influences and Harmful Ideologies

Pupils may be exposed online to content that promotes harmful ideologies, including misogyny, intolerance, dominance, aggression or dehumanisation of others. Such content can negatively influence attitudes, language and behaviour, particularly where pupils lack critical thinking skills or positive role models.

Exposure to these narratives may:

- normalise bullying or abusive behaviour
- reinforce power imbalances
- encourage sexual harassment or coercive behaviour
- undermine respectful relationships

Nova Newcastle Ltd addresses these risks through:

- education on online safety and critical thinking
- RSHE and pastoral support
- clear boundaries around language and behaviour
- early intervention where concerning attitudes or behaviours emerge

Staff Responsibility

All staff must challenge harmful language, attitudes and behaviours consistently and proportionately, and ensure that pupils understand the impact of their actions on others.

Concerns relating to online influence, extremist or misogynistic content must be recorded and shared with the DSL for assessment and appropriate response.

7.0 Responding to Bullying and Peer – on – Peer Abuse: Procedures

Nova Newcastle Ltd Alternative Provision takes all bullying and peer-on-peer abuse concerns seriously and responds in a timely, consistent and safeguarding-focused manner.

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Any member of staff who witnesses bullying behaviour, receives a disclosure, or becomes aware of a concern must act without delay.

Immediate Action

Where bullying is identified or suspected, staff must:

- prioritise the safety and wellbeing of all pupils involved
- intervene appropriately to prevent further harm
- provide reassurance and emotional containment
- seek medical or emotional support where required

Pupils must not be left unsupported while concerns are assessed.

Recording and Reporting

The member of staff raising the concern must:

- record the incident or concern as soon as possible and no later than the same working day
- record factual information only, avoiding assumptions or leading language
- report the concern without delay to the **Designated Safeguarding Lead (DSL)** or Deputy DSL

The alleged victim or any witnesses must not be asked leading questions that could compromise safeguarding or future investigation.

Leadership Review and Decision-Making

The DSL or a senior leader will:

- review all information and records
- assess safeguarding thresholds
- determine appropriate actions and interventions
- decide whether external agency involvement is required

Actions will always prioritise pupil safety, dignity and emotional wellbeing.

Support and Intervention

Where bullying is confirmed or suspected:

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- appropriate support will be provided to the pupil(s) affected
- behaviour support strategies will be implemented for pupils whose behaviour causes harm
- counselling, mentoring or therapeutic support may be arranged where necessary

Support plans will be reviewed and adjusted based on ongoing monitoring.

Risk Assessment and Review

Following a bullying incident:

- relevant behaviour support plans and/or risk assessments will be reviewed and updated
- supervision and protective measures will be adjusted as required
- staff will be informed of necessary changes on a need-to-know basis

Escalation and External Reporting

Where internal measures are insufficient to safeguard a pupil, or where safeguarding thresholds are met, the DSL will escalate concerns in line with local authority safeguarding procedures.

All staff must cooperate with external agencies involved in safeguarding processes.

Whistleblowing and Escalation of Concerns

Staff who believe that bullying concerns are not being managed appropriately may:

- raise concerns through the Whistleblowing Policy
- escalate concerns to senior leadership

No member of staff will be treated less favourably for raising a genuine safeguarding concern in good faith.

Monitoring and Accountability

All bullying incidents and outcomes will:

- be recorded and reviewed for patterns and trends
- inform adjustments to practice, staffing or environment
- contribute to ongoing safeguarding and quality assurance processes

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8.0 Supporting Pupils and Staff Affected by Bullying

Nova Newcastle Ltd Alternative Provision recognises that the impact of bullying can extend beyond the immediate incident. Ongoing, proportionate support is essential to ensure pupils feel safe, supported and able to re-engage positively with learning and relationships.

Support arrangements are tailored to individual needs and reviewed regularly.

Support for Pupils Who Have Experienced Bullying

Pupils affected by bullying may be offered:

- regular emotional check-ins with a trusted member of staff
- mentoring or pastoral support
- access to counselling or therapeutic services where appropriate
- adjustments to routines, groupings or supervision
- review and adaptation of behaviour support plans or risk assessments

Support is provided in a way that promotes dignity, empowerment and emotional safety.

Support for Pupils Displaying Bullying Behaviour

Where a pupil has engaged in bullying behaviour, support will focus on:

- helping the pupil understand the impact of their actions
- addressing underlying needs or contributing factors
- reinforcing clear boundaries and expectations
- developing emotional regulation, empathy and problem-solving skills

Interventions are designed to promote learning and change, not shame or exclusion.

Ongoing Monitoring and Review

Staff will:

- check in regularly with pupils involved, for a minimum period of four weeks
- monitor progress and emotional wellbeing

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- report any recurrence or escalation of concerns immediately

Support arrangements will be reviewed and adapted where concerns persist.

Peer Support and Positive Culture

Where appropriate, pupils may be supported to:

- engage in peer support activities
- participate in group work that promotes inclusion and mutual respect

Staff will actively model respectful behaviour and reinforce positive interactions at all times.

Positive Reinforcement

Nova Newcastle Ltd promotes positive behaviour and healthy relationships through:

- recognition of effort and progress
- consistent praise and encouragement
- proportionate reward systems

Positive reinforcement is used to support a culture where bullying behaviour is discouraged and respectful behaviour is the norm.

Support for Staff

Staff affected by bullying or challenging incidents may access:

- supervision and reflective practice
- support from senior leaders
- additional training or professional development
- external support services where appropriate

Staff wellbeing is recognised as essential to maintaining a safe and supportive provision.

9.0 Monitoring and Review

Nova Newcastle Ltd Alternative Provision is committed to ensuring that this Anti-Bullying and Peer-on-Peer Abuse Policy remains effective, responsive and reflective of best practice.

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The **Designated Safeguarding Lead (DSL)**, supported by senior leadership, holds responsibility for monitoring the implementation and effectiveness of this policy.

Ongoing Monitoring

Monitoring activities include:

- regular review of bullying and peer-on-peer abuse records
- analysis of patterns, trends, locations and times
- review of behaviour support plans and risk assessments
- staff supervision and reflective practice
- pupil voice activities and feedback sessions

Monitoring focuses on both individual incidents and wider themes that may indicate systemic risk or need for improvement.

Feedback and Consultation

Feedback is actively sought from:

- pupils
- staff
- parents/carers (where appropriate)
- education and safeguarding partners

Feedback is used to inform improvements to practice, staff training and preventative strategies.

Quality Assurance and Leadership Oversight

Senior leaders will:

- review the effectiveness of interventions and support strategies
- evaluate whether actions taken have reduced risk and prevented recurrence
- ensure staff understand and apply the policy consistently

Where patterns or concerns are identified, leadership will take prompt action to address underlying issues.

Policy Review

This policy will be:

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- formally reviewed at least annually
- reviewed following a serious incident or safeguarding concern
- updated in response to changes in legislation, statutory guidance or inspection findings

Any updates will be communicated clearly to staff and incorporated into training and practice.

Impact and Continuous Improvement

The impact of this policy is measured through:

- reduced incidents and escalation
- improved pupil wellbeing and engagement
- increased confidence in reporting concerns
- consistent staff practice and accountability

Learning from monitoring and review is used to strengthen safeguarding culture and promote continuous improvement across the provision.

10.0 Legislation, Statutory Guidance and Reference Documents

This policy is informed by and should be read in conjunction with the following legislation and statutory guidance:

- Keeping Children Safe in Education (current edition)
- Working Together to Safeguard Children
- Education Inspection Framework
- Behaviour in Schools Guidance
- Equality Act 2010
- UK Council for Internet Safety – Tackling Cyberbullying Guidance

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APPENDIX 1: EQUALITY IMPACT ASSESSMENT

The organisation aims to design and implement policies and procedures that meet the diverse needs of our service and workforce, ensuring that none are placed at a disadvantage over others, in accordance with the Equality Act 2010. Consideration has been given to the impact this policy might have with regard to the individual protected characteristics of those to whom it applies.

In an Alternative Provision setting, consideration must also be given to the impact of policies and practice on **children and young people**, many of whom may be vulnerable learners, have SEND, experience trauma, or be at increased risk of exclusion or discrimination.

Consideration has been given to the impact this policy might have with regard to the individual protected characteristics of those to whom it applies, including both **staff and pupils/learners**, parents/carers, and wider stakeholders.

Ref #	Question	Yes	Comments
		No	
		N/A	
1	Does the document/guidance affect one group less or more favourably than another on the basis of:	No	
	Age	No	
	Race/Ethnic origins (including Gypsy, Roma and Traveller)	No	

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	Sex (man or woman)	No	
	Gender Reassignment	No	
	Pregnancy/Maternity	No	
	Religion or Belief	No	
	Sexual orientation including lesbian, gay and bisexual people	No	
	Marriage/Civil Partnership	No	
	Disability - learning disabilities, physical disability, sensory impairment and mental health problems	No	
	Carers	No	
2	Is there any evidence that some groups are affected differently?	No	
3	If you have identified potential discrimination, are there any exceptions valid, legal and/or justifiable?	No	
4	Is the impact of the document/guidance likely to be negative?	No	
5	If so, can the impact be avoided?	N/A	
6	What alternative is there to achieving the document/guidance without the impact?	N/A	
7	Can we reduce the impact by taking different action?	N/A	
8	Does this policy impact pupils with SEND, SEMH needs or Education, Health and Care Plans (EHCPs)?	No	
9	Could this policy lead to disproportionate behaviour sanctions, exclusions or barriers to reintegration for any protected group?	No	

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10	Does this policy ensure reasonable adjustments are made so disabled pupils and staff can access education, support and services fairly?	Yes	
11	Does this policy promote inclusion and belonging for pupils who may experience discrimination, bullying or peer-on-peer abuse linked to protected characteristics?	Yes	
12	Does this policy support safeguarding duties, including protection from discriminatory bullying, online harassment and peer-on-peer abuse?	Yes	
13	Are there any barriers for parents/carers from diverse backgrounds (e.g., language, culture, disability) in accessing information or engaging with the organisation?	No	
14	Does this policy promote equality of opportunity in curriculum access, support planning and learner voice?	Yes	
15	Have pupils' individual vulnerabilities been considered, including those who are Looked After, Previously Looked After, or known to social care?	Yes	

For advice in respect of answering the above questions, or if a potential discriminatory impact has been identified, please contact the Designated Safeguarding Lead (DSL) or Equality and Diversity Lead.

Names and Organisation of Individuals who carried out the Assessment: Please give contact details.	Date of the Assessment
Name & Job Title: : Rhea Marwaha, Director	15.04.2026

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