

# EMPOWERING FUTURES ALTERNATIVE PROVISION

## ANTI-BULLYING POLICY (CHILDREN, YOUNG PEOPLE & ADULT LEARNERS)

**Issue Date:** December 2025

**Next Review:** December 2026

**Approved by:** Director, Empowering Futures Alternative Provision

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### 1. POLICY STATEMENT

Empowering Futures Alternative Provision (EFAP) is committed to providing a safe, inclusive, respectful learning environment for **children, young people and adult learners**. Bullying of any kind is unacceptable and will not be tolerated in any part of our provision, including:

- On-site learning
- Off-site vocational learning
- Community delivery
- Online and remote learning
- Adult evening or weekend classes

EFAP recognises that **bullying is a safeguarding concern** and may constitute:

- Child-on-child abuse
- Adult-on-adult bullying
- Adult-on-child bullying
- Harassment
- Discrimination
- Criminal behaviour

This policy aligns with:

- Keeping Children Safe in Education (KCSIE) 2024/25
- Working Together to Safeguard Children 2023
- DfE Preventing & Tackling Bullying Guidance (2017)
- Care Act 2014 (Adults at Risk)
- Equality Act 2010
- UK GDPR & Data Protection Act 2018

- Counter-Terrorism & Security Act 2015 (Prevent Duty)
  - EFAP Safeguarding & Child/Adult Protection Policy
  - EFAP Behaviour & Conduct Policy
  - EFAP Online Safety Policy
  - EFAP SEND Policy
  - EFAP Complaints and Appeals Policies
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## 2. SCOPE OF THE POLICY

This policy applies to:

- All learners (children, young people and adults)
  - All EFAP staff (including temporary, agency, apprentices, freelancers, contractors, tutors, assessors, sports coaches, beauty tutors, mentors, volunteers)
- All visitors
- All online interactions involving EFAP learners or staff

It covers bullying that occurs:

- On EFAP premises
  - During off-site visits, placements or community sessions
  - In online learning environments (Zoom, Teams, Virtual Classrooms)
  - Via social media, messaging platforms or gaming platforms
  - Outside of EFAP hours if it impacts EFAP learners
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## 3. DEFINITIONS OF BULLYING

Bullying is **repeated, intentional, harmful** behaviour that involves an imbalance of power. It can be carried out by individuals or groups.

### 3.1 Types of Bullying

- **Physical:** Hitting, pushing, damage to property, intimidation
- **Verbal:** Name-calling, threats, discriminatory remarks
- **Emotional:** Excluding, isolating, humiliation, manipulation
- **Cyberbullying:** Online threats, harassment, fake profiles, sharing private information
- **Sexual bullying:** Unwanted sexual comments, upskirting, sexting pressure
- **Discriminatory bullying:** Targeting protected characteristics (race, disability, sexual orientation, gender identity, religion, age)
- **Appearance-based bullying:** Common in beauty, nails, hair and sports contexts
- **Power-based bullying:** Misuse of authority, status or age

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## 4. RECOGNISING VULNERABLE LEARNERS

Certain learners are at higher risk, including:

- SEND learners
- Learners with EHCPs
- LAC and previously LAC
- Care leavers
- Learners with SEMH needs
- Learners experiencing domestic abuse
- Learners with physical differences or disabilities
- LGBTQ+ learners
- Adult learners with additional vulnerabilities (under Care Act 2014)

Staff must be vigilant and report concerns immediately.

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## 5. ROLES & RESPONSIBILITIES

### 5.1 Designated Safeguarding Leads

- **Director & Lead DSL: Rhean White**
- **DSL: Carla Wallis**
- **Deputy DSL(s):** [Add if required]

Responsible for:

- Oversight of bullying concerns
  - Ensuring robust investigation
  - Informing commissioners, schools, LAs and social workers
  - Monitoring patterns and risk levels
  - Updating safeguarding records
  - Ensuring multi-agency involvement when necessary
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### 5.2 Managers & Senior Leadership

Responsible for:

- Operational oversight
  - Implementing the policy
  - Ensuring staff training
  - Ensuring safe staffing levels
  - Oversight of serious incidents
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### **5.3 Tutors, Assessors & Support Staff**

Responsible for:

- Identifying early signs of bullying
  - Creating safe, inclusive classrooms and practical training environments
  - Reporting concerns immediately to the DSL
  - Supporting learners throughout investigation processes
  - Modelling respectful behaviour
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### **5.4 Learners (Children & Adults)**

Expected to:

- Treat others with respect
  - Report bullying or concerns
  - Follow EFAP Behaviour & Conduct expectations
  - Support peers appropriately
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### **5.5 Parents/Carers (for under-18s)**

Expected to:

- Communicate concerns promptly
  - Support EFAP behaviour expectations
  - Work in partnership with EFAP, school and LA
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## **6. BULLYING IN VOCATIONAL & PRACTICAL ENVIRONMENTS**

EFAP includes practical learning in:

- Beauty
- Nails
- Hair
- Sports
- Fitness
- Customer Service
- Work-related training environments

These settings have additional risks:

- Appearance-based insults
- Body shaming
- Mocking skills or performance
- Intimidation in sports activities
- Social exclusion during teamwork
- Pressure, coercion or manipulation in adult classes

Bullying in any vocational setting is treated as a **safeguarding matter**.

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## 7. BULLYING IN ONLINE & REMOTE LEARNING

Online AP and adult training require additional safeguarding measures.

Examples of online bullying include:

- Private messaging during class
- Harassment in chat boxes
- Screen-sharing inappropriate content
- Recording sessions without consent
- Using social media to target peers or staff

EFAP will:

- Monitor engagement
  - Remove learners from sessions if risk is present
  - Gather digital evidence
  - Follow safeguarding escalation procedures
  - Involve the LA, school or police where necessary
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# 8. REPORTING & RECORDING PROCEDURES

Bullying is recorded and investigated through EFAP's safeguarding systems.

## 8.1 Immediate Reporting

All staff must report bullying concerns to the **DSL immediately**.

Learners and parents can report via:

- Speaking to staff
  - Email
  - Phone
  - Online form (if applicable)
  - Confidential reporting during sessions
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## 8.2 Recording

EFAP records:

- Description of incident
- Evidence (screenshots, messages, statements)
- Impact on learner
- Risk level
- Actions taken
- Outcomes
- Monitoring plans

Bullying logs are reviewed regularly to identify patterns.

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## 8.3 Investigation Process

Investigations are led by:

- DSL
- Senior Leadership

Process includes:

1. Collecting accounts from all parties

2. Gathering evidence
3. Assessing risk
4. Implementing safety measures
5. Liaising with school/LA/social worker
6. Decision-making and sanctions
7. Follow-up support

Timescale: **Initial response within 24 hours; full investigation within 5 working days** unless complexity requires escalation.

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## **8.4 Multi-Agency Involvement**

The DSL will inform:

- School/commissioner
  - Local Authority
  - Social worker
  - Police (if criminal behaviour)
  - Early Help services
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# **9. RESPONDING TO BULLYING: SUPPORT & INTERVENTION**

## **9.1 Support for the Victim**

Support may include:

- Pastoral support
  - Safety planning
  - Mentoring
  - Counselling signposting
  - Changes to groupings
  - Online safety support
  - SEN adjustments
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## 9.2 Support for the Perpetrator

Actions may include:

- Behaviour support plan
  - Training and education
  - Restorative approaches
  - Targeted intervention
  - Escalation to senior leadership
  - Multi-agency referral
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## 9.3 Sanctions

Sanctions follow EFAP's Behaviour & Conduct Policy and may include:

- Loss of privileges
- Increased supervision
- Removal from practical lessons
- Temporary suspension from EFAP
- Permanent removal from EFAP (commissioner involved)
- Police involvement if criminal

Adult learners may face:

- Removal from course
  - Withdrawal of funding
  - Termination of enrolment contract
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# 10. PREVENT DUTY & BULLYING

Bullying linked to:

- Radicalisation
- Extremist ideology
- Hate-based behaviour
- Political or ideological coercion

Will be escalated immediately through Prevent Duty channels.

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# 11. SEND CONSIDERATIONS



Learners with SEND may:

- Misinterpret social cues
- Struggle with communication
- Be unintentionally involved
- Be highly vulnerable to manipulation

Investigations must:

- Consider additional needs
  - Involve SENCO input (or equivalent)
  - Include reasonable adjustments
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## **12. ADULT SAFEGUARDING (CARE ACT 2014)**

Bullying involving adult learners may constitute:

- Psychological abuse
- Harassment
- Coercive control
- Discrimination
- Financial exploitation
- Domestic abuse

EFAP follows adult safeguarding procedures, including:

- Referral to Adult Social Care
  - Police involvement
  - Support planning
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## **13. PARTNERSHIP WITH SCHOOLS, LAs & AWARDING BODIES**

EFAP will:

- Inform commissioners immediately of serious incidents
- Provide written reports
- Update risk assessments

- Participate in multi-agency meetings
  - Provide evidence to awarding bodies if required
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## 14. MONITORING & REVIEW

EFAP monitors:

- Incident patterns
- Vulnerable cohorts
- Use of sanctions
- Online trends
- Vocational-setting risk patterns

Data is reviewed termly by the DSL and Director.

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## 15. POLICY REVIEW

This policy will be reviewed:

- Annually
- After significant incidents
- After legislative changes
- Following LA or awarding body audits
- In line with safeguarding updates

Approved by:

**Rhean White – Director & Lead DSL**

Empowering Futures Alternative Provision