

Last updated: 23rd September 2026

1 Introduction

- 1.1 Bright Heart Education Ltd (company number 11179043) of 20-22 Wenlock Road, London, N1 7GU (the “**Company**”) works closely with children and families as part of its tutoring activities.
- 1.2 The Company has a moral and legal obligation to ensure that, when given responsibility for young people, they are treated with the highest possible standard of care, that we safeguard them and promote their welfare, and that they are provided with a safe working environment. Children and young people with Special Educational Needs and Disabilities (SEND) can face additional safeguarding challenges.
- 1.3 All children, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, have the right to equal protection from all types of harm or abuse.
- 1.4 Everyone has an important role to play in preventing all forms of bullying (including online) and stopping bullying.
- 1.5 The purpose of this policy is:
 - 1.5.1 to prevent bullying from happening between children and young people who are a part of our Company or take part in our activities;
 - 1.5.2 to make sure bullying is stopped as soon as possible if it does happen and that those involved receive the support they need; and
 - 1.5.3 to provide information to all staff, tutors, children and their families about what we should all do to prevent and deal with bullying.
- 1.6 This policy has been drawn up based on legislation, policy and guidance that seeks to protect children in the UK.
- 1.7 This policy statement applies to anyone working on behalf of the

Company, including directors, staff, tutors, and students.

- 1.8 The Company recognises its responsibility to report child protection and safeguarding concerns to the relevant social worker or Local Education Authority and will ensure that all tutors are updated on child protection issues per its Safeguarding and Child Protection Policy.
- 1.9 The Company’s Safeguarding and Child Protection Policy, Online Tutoring Policy, and Attendance Policy should also be read in conjunction with this policy.
- 1.10 **Carol Minkoulou** is the Company’s **Designated Safeguarding Lead (DSL)** and **Nominated Anti-bullying Lead**. Carol can be reached on **0203 807 2894**.
- 1.11 **Rosie Gillman** is the Company’s **Deputy DSL**. Rosie can be reached on **0203 807 2894**.
- 1.12 **Rebecca Reidel-Fry** is the Company’s **Deputy DSL**. Rebecca can be reached on **0203 807 2894**.
- 1.13 **Ryan Stevenson** is the Company’s **Executive Lead for Safeguarding**. Ryan can be reached on **0203 807 2894**.
- 1.14 Carol Minkoulou, Ryan Stevenson, Rosie Gillman and Rebecca Reidel-Fry are collectively referred to as the **Safeguarding Team**.
- 1.15 The Company operates a **dedicated safeguarding inbox** at safeguarding@brighthouse.co.uk, which is **monitored by the Safeguarding Team during working hours**. The Deputy DSLs provide cover when the DSL is unavailable.
- 1.16 The Safeguarding Team can be reached in an **after-hours safeguarding emergency** on **0203 807 2894**.

2 What is bullying and cyberbullying and its impact

- 2.1 Bullying is deliberate, persistent, offensive and humiliating behaviour intended to harm, harass, intimidate or coerce another person.

- 2.2 Bullying may come in many different forms, some of which are:
 - 2.2.1 physical bullying (e.g. hitting, pushing, slapping someone);
 - 2.2.2 verbal bullying (e.g. name calling, gossiping, threatening someone);
 - 2.2.3 non-verbal abuse (e.g. hand-signs);
 - 2.2.4 exclusion (deliberate ostracism); and
 - 2.2.5 cyberbullying, which is bullying carried out through electronic or online means (e.g. abusive or threatening messages; sharing embarrassing, abusive or manipulated images or videos; trolling; online shaming; exclusion from online games, chats or friendship groups; setting up hate groups; making or sharing nudes or semi-nudes; or pressuring someone into sharing sexual images or engaging in sexual conversations).
- 2.3 Bullying may also be prejudice-based or discriminatory, including bullying related to race or ethnicity, religion or belief, disability, sex, sexual orientation, gender reassignment or other perceived difference.
- 2.4 The growing ubiquity of the internet has contributed to cyberbullying.
- 2.5 Any type of bullying may lead to mental health problems such as depression and anxiety, having fewer friendships, being weary or suspicious of others, problems adjusting to school, and poor academic performance. In some instances, bullying can cause significant harm.

Children with SEND may be at increased risk of bullying and may face additional barriers to recognising, communicating or reporting it.
- 2.6 When assessing online bullying risk, consider the '4Cs' (content, contact, conduct, commerce) and emerging risks from generative AI, including AI-generated or manipulated abusive content, impersonation and deepfakes.
- 2.7 Further detailed information about bullying and cyberbullying is

available here: <https://learning.nspcc.org.uk/child-abuse-and-neglect/bullying-cyberbullying>

3 Our responsibilities to prevent bullying

- 3.1 We will seek to prevent bullying by:
 - 3.1.1 Developing a code of behaviour that sets out how everyone involved in our Company is expected to behave, in face-to-face contact and online, and within and outside of our activities;
 - 3.1.2 Holding discussions with staff, tutors, children, young people and families who use our Company about bullying and how to prevent it;
 - 3.1.3 Providing support and training for all staff and tutors on dealing with all forms of bullying, including racist, faith-targeted, disability-based, sexist, misogynistic or misandrist, homophobic, biphobic, transphobic, sexual and other prejudice-based or discriminatory bullying; and
 - 3.1.4 putting clear and robust anti-bullying procedures in place.
- 3.2 Our discussions with staff, tutors, children, young people and families will focus on:
 - 3.2.1 group members' responsibilities to look after one another and uphold the behaviour code;
 - 3.2.2 practising skills such as listening to each other;
 - 3.2.3 respecting the fact that we are all different;
 - 3.2.4 making sure that no one is without friends;
 - 3.2.5 dealing with problems in a positive way; and
 - 3.2.6 checking that our anti-bullying measures are working well.

4 Responding to bullying

- 4.1 We will make sure our response to incidents of bullying takes into account:

- 4.1.1 the needs of the person being bullied;
 - 4.1.2 the needs of the person displaying bullying behaviour;
 - 4.1.3 needs of any bystanders; and
 - 4.1.4 our Company as a whole.
- 4.2 We will review the plan we have developed to address any incidents of bullying at regular intervals, to ensure that the problem has been resolved in the long term.
- 4.3 Bullying, including cyberbullying and prejudice-based or discriminatory bullying, may constitute child-on-child abuse. **Where bullying indicates a risk of harm, it is a safeguarding concern and must be escalated to the Safeguarding Team without delay**, following the Company's safeguarding reporting process.
- 4.4 Bullying, harassment or other abusive behaviour must not be dismissed as "banter", "just having a laugh", "part of growing up" or similar. Where behaviour may constitute harmful sexual behaviour, sexual harassment or sexual violence, the Company's Safeguarding and Child Protection Policy must be followed.

5 Diversity and inclusion

- 5.1 We recognise that bullying is related to how we respect and recognise the value of diversity.
- 5.2 We will be proactive about:
 - 5.2.1 seeking opportunities to learn about and celebrate differences;
 - 5.2.2 promoting an inclusive environment across our staff, tutors, children and young people; and
 - 5.2.3 welcoming new members to our Company.