

# NEO — Online Anti-Bullying Strategy

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**NEO by Nudge Education** · Version v07.26 · Approved 16 July 2026  
(Director, NEO & Head of School) · Review annually, alongside the online safety review

This strategy applies to all learners, staff, practitioners, contractors, volunteers and visitors of Nudge Education Online (NEO). NEO is a fully online alternative provision for learners aged 11–18, operated by **Nudge Education Ltd** (Company Number 10192753). NEO is not a DfE-registered independent school and is not subject to ISI inspection; NEO is pursuing **OEAS accreditation** only. Statutory frame: **Keeping Children Safe in Education 2026** (in force 1 September 2026), especially paragraphs 163, 190–191 and Part Five; the **Online Safety Act 2023**; the **Equality Act 2010**; and **OEAS online education standard 4.5**.

## 1. Purpose and scope

This strategy sets out how Nudge Education Online (NEO) prevents, identifies and responds to bullying, including cyberbullying, between learners. NEO is a fully online provision, so all bullying at NEO is, in practice, online bullying — but this strategy also covers bullying that starts or continues off-platform (group chats, social media, gaming spaces) where it affects a NEO learner or the NEO community.

It applies to all learners, all staff, and all environments NEO provides or supervises: live lessons and their chat, Google Classroom streams and comments, group and paired work, clubs and enrichment sessions, and one-to-one channels. It is written to meet OEAS online education standard 4.5, which requires a written strategy for the prevention of bullying that happens online.

Bullying between children is a form of child-on-child abuse. KCSIE 2026 is explicit that children can abuse other children, that this is a safeguarding issue for both the child harmed and the child responsible, that it is preventable, and that it must never be dismissed as “banter”, “just having a laugh”, “part of growing up” or “boys being boys”. That framing governs everything below.

## 2. What we mean by bullying

Bullying is behaviour, usually repeated, intended to hurt, frighten, exclude or humiliate another person, where there is often an imbalance of power. Online, it includes:

- hurtful, threatening or humiliating messages in lesson chat, Classroom comments, email or any other channel;
- deliberate and repeated exclusion of a learner from group activities, calls or chats;
- prejudice-based and discriminatory bullying — targeting race, religion, sex, sexual orientation, gender identity, disability or SEND, or care status — including misogynistic and misandrist abuse;
- making, sharing or threatening to share embarrassing, altered or intimate images of another learner, **including images generated or altered using AI (“deepfakes” and “deep nudes”)**;
- impersonating another learner, or setting up accounts, polls or content designed to mock them;
- coordinated “pile-on” behaviour, on or off platform;
- pressuring another learner to share images or information, or using AI tools to generate abusive content about them.

The consensual and non-consensual making or sharing of nudes and semi-nudes by under-18s, including AI-generated images, always requires a safeguarding response — whether or not bullying is involved — and is handled under the Child Protection and Safeguarding Policy following UKCIS *Sharing nudes and semi-nudes* guidance. Harmful sexual behaviour, sexual harassment and sexual violence between learners are dealt with under KCSIE 2026 Part 5 via the safeguarding policy, not this strategy alone.

## 3. The NEO context — how our model prevents bullying

NEO’s design removes many of the spaces where bullying normally grows, and this strategy leans on that deliberately:

- **All learner-to-learner interaction happens in supervised environments.** Live lessons and their chat are staffed by a Qualified Educator; there are

no unsupervised learner forums, direct messages or open chat spaces on NEO platforms. Learner accounts are restricted to internal communication.

- **Connection before curriculum.** Every learner has a named Practitioner-Mentor who knows them well, notices changes in engagement and mood, and is a natural, trusted route for disclosure.
- **Camera-optional, small-group participation** lowers social exposure and reduces the surface for appearance-based targeting.
- **Digital etiquette is taught and modelled**, through the Cornerstones, the online safety curriculum (covering the four risk areas of content, contact, conduct and commerce) and the signed learner Acceptable Use Agreement.
- **Filtering and monitoring** on managed learner profiles, and review of platform activity, support early identification. Staff know that bullying may be happening even when nothing is reported, and watch for the quiet signals: a learner going camera-off who wasn't before, dropping out of group work, attendance dips, changed tone in chat.

## 4. Reporting — clear, easy, taken seriously

Learners can report bullying, about themselves or someone else, through any of these routes, all of which are explained to learners at induction and promoted termly:

- telling their Practitioner-Mentor, in a session or by message;
- telling any member of staff, in any lesson or channel;
- emailing the safeguarding inbox ([safeguarding@nudgeeducation.online](mailto:safeguarding@nudgeeducation.online)), which is read only by the DSL and Deputy DSLs;
- asking a parent or carer to contact NEO on their behalf (parents can use their usual NEO contacts or the safeguarding inbox).

Alongside these reporting routes, alerts from NEO's filtering and monitoring system (**Smoothwall**) can surface bullying between learners; these are escalated to the DSL in the same way as a direct report.

Every report is treated seriously. No learner will ever be treated less favourably for reporting, and reports about behaviour outside NEO's platforms are in scope where a NEO learner is affected.

## 5. Responding

1. **Record.** The member of staff receiving the report logs it the same day in the safeguarding and behaviour recording system.
2. **Assess.** The Practitioner-Mentor and the DSL (or Deputy) review the report. Because bullying is child-on-child abuse, any case involving threats, discrimination, intimate or AI-generated imagery, sexualised behaviour, or a vulnerable learner escalates immediately to the DSL as a safeguarding matter; the DSL decides whether external referral (children's social care, police, CEOP, commissioning school or local authority) is required. Where the learner is placed by a commissioner, the commissioning school or local authority is informed in line with the placement agreement.
3. **Support both children.** The learner harmed receives a support plan through their Practitioner-Mentor. The learner responsible is also treated as a child who may be at risk: consequences follow the NEO Behaviour and Regulation Policy's relational and restorative approach, alongside work to address the behaviour, and safeguarding consideration of what sits behind it.
4. **Act on content.** Harmful content on NEO platforms is preserved for the record, then removed or access-restricted. Staff never ask a child to send, and never forward, intimate images; imagery incidents follow UKCIS guidance and DfE searching, screening and confiscation advice as adapted for an online setting.
5. **Review.** The DSL reviews each closed case for pattern, group dynamics and lessons for prevention.

## 6. AI-specific commitments

Reflecting KCSIE 2026's treatment of generative AI:

- AI-generated or AI-altered imagery of a learner is treated with the same seriousness as photographic imagery; "it isn't real" is not a defence.
- Harmful interaction simulated by generative AI applications (KCSIE 2026 para 163, "contact") is within the scope of our online safety teaching and our filtering and monitoring approach.
- Learners are taught, age-appropriately, that creating or sharing AI-generated sexual imagery of under-18s is illegal, and how to report content that targets them.

- NEO's own AI systems operate under the NEO Artificial Intelligence Policy (Diamond Standard): no learner-facing AI without consent, oversight and audit.

## 7. Recording, oversight and review

All bullying reports and outcomes are logged and reviewed termly by the DSL, who reports patterns (including protected-characteristic patterns) to the Proprietor. This strategy is reviewed annually alongside NEO's online safety review and annual online risk assessment (KCSIE 2026 para 179), after any serious incident, and when statutory guidance changes. The effectiveness of reporting routes is checked through learner voice work: children are asked whether they know how to report and whether they trust that reports are acted on.

## Related policies

This strategy should be read alongside:

- **Child Protection and Safeguarding Policy** (and NEO Online Addendum)
- **NEO — Online Safety and Acceptable Use Policy**
- **NEO — Behaviour and Regulation Policy**
- **SEND Policy**
- **Complaints Policy**

## Document Control

| Version     | 07.26                                                      |
|-------------|------------------------------------------------------------|
| Approved    | 16 July 2026 — Director, NEO & Head of School              |
| Next Review | July 2027, or sooner if statutory guidance changes         |
| Owner       | Designated Safeguarding Lead (in post from 26 August 2026) |
| Approver    | Proprietor                                                 |

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| Operating | Nudge Education Ltd (Company |
| Company   | Number 10192753)             |

*This is a standalone NEO policy. The canonical Nudge Education behaviour and safeguarding policies remain primary for anything not online-specific.*