

Wargrave House School

Remarkable Autism. Redefining what's possible.

Anti-bullying Policy

November 2025

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This policy should be read in conjunction with the following policies:

- 1 Child Protection and Safeguarding Policy
- 2 Acceptable use of ICT Policy
- 3 Positive Behaviour Support Policy
- 4 Learner Mental Health and Wellbeing Policy
- 5 Curriculum Policy
- 6 AI/LLM Policy

Change History Record

Current Version	Previous Version	Summary of changes made	Section Heading & Page Number
Nov 25	Nov 24	Section added around Generative Artificial Intelligence (AI)	Generative Artificial Intelligence Page 15
Nov 25	Nov 24	Sanctions changed to Natural consequences	Natural consequences page 16
Nov 25	Nov 24	Disciplining learners changed to managing and supporting learner's behaviours	Bullying outside of school Page 19

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Introduction

Wargrave House believes that all learners are entitled to learn in a safe and supportive environment; this means being free from all forms of bullying behaviour. This policy outlines how instances of bullying are dealt with, including the procedures to prevent occurrences of bullying.

These strategies, such as learning about tolerance and difference as part of the school's curriculum, aim to promote an inclusive, tolerant and supportive ethos at the school.

The Education and Inspections Act 2006 outlines several legal obligations regarding the school's response to bullying. Under section 89, schools must have measures in place to encourage good behaviour and prevent all forms of bullying amongst learners. These measures are part of the school's Behavioural Policy, which is communicated to all learners, school staff and parents.

Policy

For the purpose of this policy, "bullying" is defined as persistent behaviour by an individual or group with the intention of verbally, physically, or emotionally harming another person or group. Bullying is generally characterised by:

- **Repetition:** Incidents are not one-offs; they are frequent and happen over an extended period of time.
- **Intent:** The perpetrator means to cause verbal, physical or emotional harm; it is not accidental.
- **Targeting:** Bullying is generally targeted at a specific individual or group.
- **Power imbalance:** Whether real or perceived, bullying is generally based on unequal power relations.

Vulnerable learners are more likely to be the targets of bullying due to the attitudes and behaviours some young people have towards those who are different from themselves. Vulnerable learners may include, but are not limited to:

- Learners who are adopted.
- Learners suffering from a health problem.
- Learners with caring responsibilities.
- Learners from socioeconomically disadvantaged backgrounds.

Learners with certain characteristics are also more likely to be targets of bullying, including, but not limited to:

- Learners who are LGBTQ+, or perceived to be LGBTQ+.
- Black, Asian and minority ethnic (PEOPLE OF THE GLOBAL MAJORITY) learners.
- Learners with SEND.

Types of bullying

Many kinds of behaviour can be considered bullying, and bullying can be related to almost anything. Teasing another learner because of their appearance, religion, ethnicity, gender, sexual orientation, home life, culture, or SEND are some of the types of bullying that can occur.

Bullying is acted out through the following mediums:

- Verbal
- Physical
- Emotional
- Online (cyberbullying)

Racist bullying: Bullying another person based on their ethnic background or skin colour. Racist bullying is a criminal offence under the Crime and Disorder Act 1998 and Public Order Act 1986.

Homophobic and biphobic bullying: Bullying another person because of their actual or perceived sexual orientation.

Transphobic bullying: Bullying based on another person's gender identity or gender presentation, or for not conforming to dominant gender roles.

Sexist bullying: Bullying based on sexist attitudes expressed in a way to demean, intimidate or harm another person because of their sex or gender. Sexist bullying may sometimes be characterised by inappropriate sexual behaviours.

Sexual bullying: Bullying behaviour that has a physical, psychological, verbal or non-verbal sexual dimension or dynamic that subordinates, humiliates or intimidates another person. This is commonly underpinned by sexist attitudes or gender stereotypes.

Ableist bullying: Bullying behaviour that focusses on another person's disability or support needs; this can include mocking the individual's disability or their needs, using derogatory words or slurs in relation to an individual's disability, or deliberately excluding an individual because of their disability.

Prejudicial bullying: Bullying based on prejudices directed towards specific characteristics or experiences, e.g. religion or mental health issues.

Relational bullying: Bullying that primarily constitutes of excluding, isolating and ostracising someone – usually through verbal and emotional bullying.

Socioeconomic bullying: Bullying based on prejudices against the perceived social status of the victim, including, but not limited to, their economic status, their parents' occupations, their health or nutrition level, or the perceived "quality" of their clothing or belongings.

Roles and responsibilities

The governing board is responsible for:

- Evaluating and reviewing this policy to ensure that it does not discriminate against any learners on the basis of their protected characteristics or backgrounds.
- The overall implementation and monitoring of this policy.
- Ensuring that the school adopts a tolerant and open-minded policy towards difference.
- Ensuring the school is inclusive.
- Analysing any bullying data to establish patterns and reviewing this policy in light of these.
- Appointing a safeguarding link governor who will work with the DSL to ensure the policies and practices relating to safeguarding, including the prevention of cyberbullying, are being implemented effectively.

The head teacher is responsible for:

- Reviewing and amending this policy, accounting for new legislation and government guidance, and using staff experience of dealing with bullying incidents in previous years to improve procedures.
- Keeping a Bullying Report Form of all reported incidents, including which type of bullying has occurred, to allow for proper analysis of the data collected.
- Analysing the data in the bullying record at termly intervals to identify trends, so that appropriate measures to tackle them can be implemented.
- Arranging appropriate training for staff members.

Deputy/ Assistant Head are responsible for:

- Corresponding and meeting with parents where necessary.
- Providing a point of contact for learners and parents when more serious bullying incidents occur.

Teachers are responsible for:

- Being alert to social dynamics in their class.
- Being available for learners who wish to report bullying.
- Providing follow-up support after bullying incidents.
- Being alert to possible bullying situations, particularly exclusion from friendship groups, and informing the learner's heads of year of such observations.
- Refraining from stereotyping when dealing with bullying.
- Understanding the composition of learner groups, showing sensitivity to those who have been the victims of bullying.
- Reporting any instances of bullying once they have been approached by a learner for support.

The Safeguarding and Wellbeing Officer and Therapy Team is responsible for:

- Offering emotional support to victims of bullying.
- Alerting the ELT regarding any incidents of bullying.

Parents are responsible for:

- Informing their child's teacher or ELT if they have any concerns that their child is the victim of bullying or involving in bullying in anyway.
- Being watchful of their child's behaviour, attitude and characteristics and informing the relevant staff members of any changes.

Learners are responsible for:

- Informing a member of staff if they witness bullying or are a victim of bullying.
- Not making counter-threats if they are victims of bullying.
- Walking away from dangerous situations and avoiding involving other learners in incidents.
- Keeping evidence of cyberbullying and informing a member of staff should they fall victim to cyberbullying.

Statutory requirements

Wargrave House understands that, under the Equality Act 2010, it has a responsibility to:

- Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the act.
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it.
- Foster good relations between people who share a protected characteristic and people who do not share it.

Wargrave House understands that, under the Human Rights Act (HRA) 1998, it could have charges brought against it if it allows the rights of learners to be breached by failing to take bullying seriously. The head teacher will ensure that this policy complies with the HRA; the head teacher understands that they cannot do this without fully involving their teaching staff.

Although bullying itself is not a criminal offence, some types of harassment, threatening behaviour and/or communications may be considered criminal offences:

- Under the Malicious Communications Act 1988, it is an offence for a person to electronically communicate with another person with the intent to cause distress or anxiety, or in a way which conveys a message which is indecent or grossly offensive, a threat, or contains information which is false and known or believed to be false by the sender.
- The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct amounting to harassment.
- Section 127 of the Communications Act 2003 makes it an offence to send, by means of a public electronic communications network, a message, or other matter, that is grossly offensive or of an indecent, obscene or menacing character. It is unlawful to disseminate defamatory information through any media, including internet sites.
- Other forms of bullying which are illegal and should be reported to the police include violence or assault, theft, repeated harassment or intimidation, and hate crimes.

Prevention

Wargrave House will clearly communicate a whole-school commitment to addressing bullying in the form of a written statement which will be regularly promoted across the whole school.

All members of the school will be made aware of this policy and their responsibilities in relation to it. All staff members will receive training on identifying and dealing with the different types of bullying.

KS2 classes- All types of bullying will be discussed as part of the relationships and health education curriculum, in line with the Relationships and Health Education Policy.

KS3 and KS4 classes- All types of bullying will be discussed as part of the RSE and health education curriculum, in line with the Relationships, Sex and Health Education (RSHE) Policy.

The curriculum will explore and discuss issues at age-appropriate stages such as:

- Healthy and respectful relationships.
- Boundaries and consent.
- Stereotyping, prejudice and equality.
- Body confidence and self-esteem.
- How to recognise abusive relationships and coercive control.
- Harmful sexual behaviour, the concepts involved and why they are always unacceptable, and the laws relating to it.

Staff will encourage learner cooperation and the development of interpersonal skills using group and pair work. Diversity, difference and respect for others will be promoted and celebrated through various lessons. Opportunities to extend friendship groups and interactive skills will be provided through participation in special events, e.g. drama productions, sporting activities and cultural groups.

Seating plans will be organised and altered in a way that prevents instances of bullying. Potential victims of bullying will be placed in working groups with other learners who do not abuse or take advantage of others.

A safe place, supervised by a teacher, will be available for learners to go to during free time if they feel threatened or wish to be alone. The teacher supervising the area will speak to learners to find out the cause of any problems and, ultimately, stop any form of bullying taking place.

Learners deemed vulnerable, will meet with their form teacher or a member of the therapy team on a regular basis, where appropriate, to ensure any problems can be actioned quickly. All employees of Wargrave House will also

offer an 'open door' policy allowing learners to discuss any bullying, whether they are victims or have witnessed an incident.

Before a new learner joins the school, particularly when this happens in-year, the learner's teacher and the DSL will implement a strategy to prevent bullying from happening – this will include providing a welcome book, a tour of the school and class they learner would be in and a further visit to meet class peer group and learners already in the class would be supported with visuals and a discussion about the new learner their likes and encourage friendship with the new learner. Where a new learner is deemed vulnerable, this strategy may involve further observation or intervention on the part of the DSL.

Wargrave House will be alert to, and address, any mental health and wellbeing issues amongst learners, as these can be a cause, or a result, of bullying behaviour.

Wargrave House will ensure potential perpetrators are given support as required, so their educational, emotional and social development is not negatively influenced by outside factors, e.g. mental health issues.

Signs of bullying

Staff will be alert to the following signs that may indicate a learner is a victim of bullying:

- Being frightened to travel to or from school
- Unwillingness to attend school
- Repeated or persistent absence from school
- Becoming anxious or lacking confidence
- Saying that they feel ill repeatedly
- Decreased involvement in school work
- Leaving school with torn clothes or damaged possessions
- Missing possessions
- Missing dinner money
- Asking for extra money or stealing
- Cuts or bruises
- Lack of appetite
- Unwillingness to use the internet or mobile devices
- Lack of eye contact
- Becoming short tempered
- Change in behaviour and attitude at home

Although the signs outlined above may not be due to bullying, they may be due to deeper social, emotional or mental health issues, so are still worth investigating. Learners who display a significant number of these signs will be approached by a member of staff to determine the underlying issues causing this behaviour.

Staff will be aware of the potential factors that may indicate a learner is likely to exhibit bullying behaviours, including, but not limited to, the following:

- They have experienced mental health problems, which have led to them becoming more easily aggravated
- They have been the victim of abuse
- Their academic performance has started to fall and they are showing signs of stress

If staff become aware of any factors that could lead to bullying behaviours, they will notify the learners teacher, who will investigate the matter and monitor the situation or refer the case to ELT or DSL

Staff principles

Wargrave House will ensure that prevention is a prominent aspect of its anti-bullying vision.

Staff will treat reports of bullying seriously and will not ignore signs of suspected bullying. Staff will act immediately when they become aware of a bullying incident. Unpleasantness from one learner towards another will always be challenged and will never be ignored.

Staff will always respect learner's privacy, and information about specific instances of bullying is not discussed with others, unless the learner has given consent, or there is a safeguarding concern. If a member of staff believes a learner is in danger, e.g. of being hurt, they will inform the DSL immediately.

Follow-up support will be given to both the victim and perpetrator in the months following an incident to ensure all bullying has stopped.

Child-on-child abuse

Wargrave House has a zero-tolerance approach to all forms of child-on-child abuse, including sexual harassment and sexual violence.

To prevent child-on-child abuse and address the wider societal factors that can influence behaviour, the school will educate learners about abuse, its

forms, and the importance of discussing any concerns and respecting others through the curriculum, assemblies and PSHE lessons, in line with the Prevention section of this policy.

All staff will be aware that learners of any age and gender are capable of abusing another learner. Staff will take all instances of child-on-child abuse equally seriously regardless of the characteristics of the perpetrators or victims, will never tolerate abuse as “banter” or “part of growing up”, and will never justify sexual harassment, e.g. as “boys being boys”, as this can foster a culture of unacceptable behaviours. Staff will also be aware that child-on-child abuse can be manifested in many ways, including sexting, sexual harassment and assault, and hazing- or initiation-type violence.

Learners will be made aware of how to raise concerns or make a report and how any reports will be handled – this includes the process for reporting concerns about friends or other learners. If a learner has been harmed, is in immediate danger or is at risk of harm, a referral may be made to children’s social care services (CSCS), where the DSL deems this appropriate in the circumstances.

Cyberbullying

Cyberbullying can take many forms and can go even further than face-to-face bullying by invading personal space and home life, and can target more than one person. It can also take place across age groups and target learners, staff and others, and may take place inside school, within the wider community, at home or when travelling. It can sometimes draw bystanders into being accessories.

Cyberbullying can include the following:

- Threatening, intimidating or upsetting text messages
- Threatening or embarrassing pictures and video clips
- Disclosure of private sexual photographs or videos with the intent to cause distress
- Silent or abusive phone calls
- Using the victim’s phone to harass others, to make them think the victim is responsible
- Threatening or bullying emails, possibly sent using a pseudonym or someone else’s name
- Menacing or upsetting responses to someone in a chatroom
- Unpleasant messages sent via instant messaging

- Unpleasant or defamatory information posted to blogs, personal websites and social networking sites, e.g. Facebook

NB. The above list is not exhaustive, and cyberbullying may take other forms.

The school has a zero-tolerance approach to cyberbullying. The school views cyberbullying with the same severity as any other form of bullying and will follow the sanctions set out in section 13 of this policy if they become aware of any incidents.

All members of staff will receive training on an annual basis on the signs of cyberbullying, in order to identify learners who may be experiencing issues and intervene effectively.

Many of the signs of cyberbullying will be similar to those found in the 'Signs of bullying' section of this policy; however, staff will be alert to the following signs that may indicate a learner is being cyberbullied:

- Avoiding use of the computer
- Being on their phone routinely
- Becoming agitated when receiving calls or text messages

Staff will also be alert to the following signs which may indicate that a learner is cyberbullying others:

- Avoiding using the computer or turning off the screen when someone is near
- Acting in a secretive manner when using the computer or mobile phone
- Spending excessive amounts of time on the computer or mobile phone
- Becoming upset or angry when the computer or mobile phone is taken away

Staff will be aware that a cyberbullying incident might include features different to other forms of bullying, prompting a particular response. Significant differences may include the following:

- **Possible extensive scale and scope** – learners may be bullied on multiple platforms and using multiple different methods that are made possible by virtue of the bullying taking place online
- **The anytime and anywhere nature of cyberbullying** – learners may not have an escape from the torment when they are at home due to the bullying continuing through technology at all times

- **The person being bullied might not know who the perpetrator is** – it is easy for individuals to remain anonymous online and on social media, and learners may be bullied by someone who is concealing their own identity
- **The perpetrator might not realise that their actions are bullying** – sometimes, the culture of social media, and the inability to see the impact that words are having on someone, may lead to learners crossing boundaries without realising
- **The victim of the bullying may have evidence of what has happened** – learners may have taken screenshots of bullying, or there may be a digital footprint that can identify the perpetrator

Staff and learners will be instructed not to respond or retaliate to cyberbullying incidents. Evidence of the incident should be recorded, e.g. taking screenshots. Staff will report incidents to their line manager or the head teacher for the incident to be investigated and support to be provided. Pupils will report incidents to a trusted member of staff.

Where offensive content is posted online targeting a staff member or learner, the person targeted will be encouraged to use the reporting mechanism on the website or social media platform to request its removal. Where the person who has posted it is known to the school, the head teacher will request they remove it directly.

The school will support learners who have been victims of cyberbullying by holding formal and informal discussions with the learner about their feelings and whether the bullying has stopped, in accordance with section 14 and section 15 of this policy.

Generative artificial intelligence (AI)

Artificial intelligence (AI) tools are now widespread and easy to access. Staff, learners and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard. Wargrave House School recognises that AI has many uses to help learners learn but may also have the potential to be used to bully others. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real. Wargrave House School will treat any use of AI to bully learners in line with our anti-bullying policy.

Natural Consequences

If the head teacher/DSL is satisfied that bullying did take place, the perpetrator will be helped to understand the consequences of their actions and warned that there must be no further incidents. The head teacher/DSL will inform the perpetrator of the type of natural consequence if the bullying continues.

If possible, the head teacher/DSL will attempt reconciliation dependent on learners needs and understanding and will obtain an apology from the perpetrator where possible. This will either be in writing to the victim, and/or witnesses if appropriate, or face-to-face, but only with the victim's full consent. Discretion will be used here; victims will never feel pressured into a face-to-face meeting with the perpetrator.

Parents are informed of bullying incidents and what action is being taken.

All staff involved in managing instances of bullying will be aware that taking disciplinary action and providing support are not mutually exclusive actions, and should be conducted simultaneously to encourage more positive behaviour in future.

The school will avoid unnecessarily criminalising learners for bullying or abusive behaviour where possible, as young people with criminal records face stigma and discrimination in future aspects of their lives. The school's focus when handling perpetrators will be supporting them to develop more positive behaviours and to refrain from abusive and bullying behaviours in the future.

Class Teacher will informally monitors the learners involved over the next half-term.

Wargrave House will remain cognisant of the fact that continued access to school can be important for rehabilitation of harmful behaviour, and will not exclude learners unless as a last resort – where there have been serious or consistent incidents of bullying, the school will act in line with the Exclusion Policy.

Procedures

Minor incidents will be reported to the victim's class teacher, who will investigate the incident, set appropriate sanctions for the perpetrator, and inform the head teacher or DSL of the incident and outcome.

When investigating a bullying incident, the following procedures will be adopted:

- The victim, alleged perpetrator and witnesses are all interviewed separately
- Members of staff ensure that there is no possibility of contact between the learners being interviewed, including electronic communication
- If a learner is injured, members of staff take the learner immediately to the school safeguarding and wellbeing officer or another first aider to access extent of their injuries
- A room is used that allows for privacy during interviews
- A witness is used for serious incidents
- If appropriate, the alleged perpetrator, the victim and witnesses are asked to write down (staff to support when a learner is unable to do this) details of the incident; this may need prompting with questions from the member of staff to obtain the full picture
- The head teacher/ DSL will gather evidence of a cyberbullying incident; this may involve text messages, emails, photos, etc. provided by the victim
- Premature assumptions are not made, as it is important not to be judgemental at this stage
- Members of staff listen carefully to all accounts, being non-confrontational and not assigning blame until the investigation is complete
- All learners involved are informed that they must not discuss the interview with other learners

Due to the potential for some specific forms of bullying to be characterised by inappropriate sexual behaviour, staff members involved in dealing with the incident are required to consider whether there is a need for safeguarding processes to be implemented

Support

In the event of bullying, victims will be offered the following support:

- Emotional support and reassurance from the Mental Health First Aider or a staff they are comfortable with.
- Reassurance that it was right to report the incident and that appropriate action will be taken
- Liaison with their parents to ensure a continuous dialogue of support
- Advice not to retaliate or reply, but to keep the evidence and show or give it to their parent or a member of staff
- Advice on aspects of online safety, in the event of cyberbullying, to prevent re-occurrence, including, where appropriate, discussion with

their parents to evaluate their online habits and age-appropriate advice on how the perpetrator might be blocked online

- Discussion with their parent on whether police action is required (except in serious cases of child exploitation or abuse where the police may be contacted without discussion with parents)

The head teacher/DSL will carefully consider in each instance of bullying that is handled whether it is appropriate to split up the victim(s) and perpetrator(s), e.g. preventing them sharing classes or spaces where possible, and will split up other harmful group dynamics to prevent further occurrences where necessary. Victims will be encouraged to broaden their friendship groups.

Staff, particularly the DSL, will work with the victim to build resilience, e.g. by offering emotional therapy.

Follow-up support

The progress of both the perpetrator and the victim will be monitored by their class teacher. One-on-one sessions to discuss how the victim and perpetrator are progressing may be appropriate. If appropriate, follow-up correspondence will be arranged with parents one month after the incident.

Learners who have been bullied will be offered continuous support. The DSL will hold a formal meeting, on a monthly basis, to check whether the bullying has stopped – these formal meetings will continue to take place once a month until the DSL and victim are confident the bullying has stopped. The victim will be encouraged to tell a trusted adult in school if bullying is repeated.

Learners who have bullied others will be supported in the following ways:

- Receiving a consequence for their actions
- Being able to discuss what happened
- Being helped to reflect on why they became involved
- Being helped to understand what they did wrong and why they need to change their behaviour
- Appropriate assistance from parents

Learners who have been bullied will be assessed on a case-by-case basis and the DSL will, if necessary, refer the victim of bullying to CAMHS.

In cases where the effects of bullying are so severe that the learner cannot successfully re-integrate back into the school, the head teacher and DSL will look to transfer the learner to another school with the consent and involvement of the learners' parents.

Where a learner who has been the victim of bullying has developed such complex needs that alternative provision is required, the learner, their parents, the head teacher and DSL will meet to discuss the use of alternative provision.

Bullying outside of school

Staff will remain aware that bullying can happen both in and outside of school, and will ensure that they understand how to respond to reports of bullying that occurred outside school in line with the Child Protection and Safeguarding Policy.

The head teacher has a specific statutory power to discipline learners for poor behaviour outside of the school premises. Section 89(5) of the Education and Inspections Act 2006 gives the head teacher the power to regulate learners' conduct when they are not on school premises, and therefore, not under the lawful charge of a school staff member.

Teachers have the power to discipline learners for misbehaving outside of the school premises. This can relate to any bullying incidents occurring anywhere off the school premises, such as on school or public transport, outside the local shops, or in a town or village centre.

At Wargrave House School we do not discipline learners we manage and support behaviours

Where bullying outside school is reported to school staff, it will be investigated and acted upon. In all cases of misbehaviour or bullying, members of staff can only manage and support the behaviours of the learner on school premises, or elsewhere when the learner is under the lawful control of the member of staff, e.g. on a school trip.

The head teacher/DSL is responsible for determining whether it is appropriate to notify the police of the action taken against a learner. If the misbehaviour could be of a criminal nature or poses a serious threat to a member of the public, the police will be informed.

Record keeping

The DSL will ensure that robust records are kept with regard to all reported or otherwise uncovered incidents of bullying – this includes recording where decisions have been made, e.g. sanctions, support, escalation of a situation and resolutions.

The head teacher and DSL will ensure that all decisions and actions recorded are reviewed on a regular basis for the purposes of:

- Identifying patterns of concerning, problematic or inappropriate behaviour on the part of certain learners that may need to be handled, e.g. with pastoral support.
- Reflecting on whether cases could have been handled better and using these reflections to inform future practice.
- Considering whether there are wider cultural issues at play within the school, e.g. whether school culture facilitates discriminatory bullying by not adequately addressing instances, and planning to mitigate this.
- Considering whether prevention strategies could be strengthened based on any patterns in the cases that arise.

Legal Context

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- Education and Inspections Act 2006
- Equality Act 2010
- Protection from Harassment Act 1997
- Malicious Communications Act 1988
- Public Order Act 1986
- Communications Act 2003
- Human Rights Act 1998
- Crime and Disorder Act 1998
- Education Act 2011
- DfE (2017) 'Preventing and tackling bullying'
- DfE (2018) 'Mental health and wellbeing provision in schools'
- DfE (2025) 'Keeping children safe in education 2025'
- DCMS, DSIT, and UK Council for Internet Safety (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'

Policy Impact

We have a rolling programme for reviewing our Company policies. We regularly review the impact of our policies on the needs, entitlements and outcomes for learners, service users, staff and parents.