

POLICY

Education – Anti Bullying

Policy Author	Laura Dickie, Head of Policy Tonia Lewis, Education and Quality Improvement Lead
Approval Date	Feb 2026
Policy Approver	Jo Dunn, Compliance, Regulation and Quality Director
Next Review Date	Feb 2029
Version No.	001
Policy Level	Education
Staff groups affected	All Education

Monitoring and Review

This policy will be monitored on an ongoing basis through the service's established governance and quality assurance systems. Responsibility for ensuring that the policy remains compliant with legislation and regulatory frameworks sits with the Proprietor Representative and Regional Lead.

A formal review of this policy will be undertaken no later than three years from the date of approval, or sooner if changes in legislation, regulatory guidance, or operational requirements necessitate it.

The Head of Policy will support this process by identifying relevant changes in legislation, regulation, national standards and emerging best practice. The Head of Policy will also incorporate learning from inspections, audits and practice developments into future revisions whilst overseeing all proposed amendments to the universal content to ensure accuracy, consistency and compliance.

**September 2026**

Tawanda Madhlangobe
(Headteacher / Principal)

Andrew Sutherland/Rob Mcconomy
(Proprietor Representative/Regional Lead)

Terminology

Our aim is to use consistent terminology throughout this policy and all supporting documentation as follows:

Term	Definition
'Establishment' or 'Site'	A generic term referring to the school/college owned by CareTech.
Learner	Any child or young person under the age of 18, or young adult over 18 who receives education.
Service Head	The senior person with overall responsibility for the school/college.
Tutor/Teacher	Members of staff who have teaching responsibility for learners at the school/college.
Parent/Carer	Parent or person with parental responsibility.
Regulatory Authority	The independent regulatory body responsible for inspecting and regulating services (e.g., Ofsted, Estyn, Education Scotland).
Social Worker	The worker allocated to the individual learner; if none is allocated, the Duty Social Worker or Team Manager is responsible.
Placing Authority	The local authority/agency responsible for placing the learner or commissioning the service.
Local Authority	The local authority for the establishment's location.
Staff	All staff working at the location, including employed staff, students on placement, contractors, agency staff, volunteers and proprietors.

1. Local Site Profile

Cambian Wisbech School is an independent Department for Education registered coeducational specialist day school in Wisbech, Cambridgeshire. The school operates as one school across two sites: Sessions House, 32 Somers Road, Wisbech, Cambridgeshire, PE13 1JF and Anglia Way, 3 Anglia Way, Wisbech, Cambridgeshire, PE13 2TY. The school provides education for pupils aged 7 to 17. Sessions House primarily supports primary age pupils and Anglia Way primarily supports secondary age pupils. All pupils have Education, Health and Care Plans and have social, emotional and mental health needs with associated special educational needs and disabilities. Many pupils have experienced disruption, school refusal or previous placement breakdown and require a personalised, relational and trauma responsive approach to re engagement with education. The school values are Aspire, Achieve, Engage, Empower and Excel. Core expectations are Ready, Respectful and Safe and the school works across both sites under the shared commitment Together Towards Excellence.

2. Purpose

Every Learner has the right to learn and work in a safe, respectful environment. This policy sets out our universal approach to preventing, identifying and responding to bullying, including online harm. It applies across all sites, to all Learners (under and over 18), all members of the staff team/education team, Teachers/tutors, volunteers, contractors and visitors.

This policy provides a consistent framework that Cambian Wisbech School implements through the local arrangements set out below.

3. Scope

- Applies to all learning, social and residential contexts linked to the site (on-site, off-site visits, transport arranged by the site, work placements, online spaces and messaging connected to learning).
- Covers bullying between Learners, and between Learners and adults connected to the site.
- Interfaces with safeguarding, behaviour, online safety, equality/inclusion, complaints and data protection arrangements.

Local scope: Cambian Wisbech School is a day school and does not provide residential care. This policy applies across Sessions House and Anglia Way, school arranged transport, taxis while under school responsibility, educational visits, community learning, work experience, alternative provision and school related online communication. Bullying or harassment arising outside school is considered where it affects a pupil's safety, wellbeing, attendance or education.

4. Local Adaptation Requirement

Some sections in this policy are marked *Adapt Locally*. These sections are completed by each site to reflect local operational procedures or national equivalents (e.g., safeguarding framework, inspection remit, curriculum/quality framework, data protection contacts).^{**}

All local additions must be:

- Accurate
- Up to date
- Consistent with national legislation and regulator guidance
- Fully aligned with the universal standards in this policy
- Where no local adaptation or local equivalent is required, the universal content remains fully applicable.

5. Legal and Regulatory Context

Cambian Wisbech School is governed by the statutory duties, safeguarding requirements and inspection arrangements that apply to independent schools in England. The universal standards in this policy are implemented through the England framework in Appendix A together with the school Safeguarding and Child Protection, Positive Behaviour Support, Online Safety, Equality and Special Educational Needs arrangements.

6. Principles (Our Commitments)

- **Relational & trauma-responsive:** We prioritise safety, dignity and connection. Responses aim to stabilise, understand and repair harm, not to escalate distress.
- **Inclusive & equitable:** We recognise that some Learners are more at risk of bullying and require proactive support and reasonable adjustments.
- **Learner voice:** We make it easy, safe and routine to report concerns—privately or with a trusted adult.
- **Preventive culture:** We teach and model respect, digital citizenship, and bystander confidence in every phase/programme.
- **Clear, timely response:** Concerns are taken seriously and addressed promptly, fairly and proportionately.
- **Evidence-informed:** We record, analyse and act on data to reduce recurrence and improve practice.

7. What We Mean by Bullying

Bullying is repeated, intentional or pattern-forming behaviour that aims to cause physical, emotional or social harm, or to exercise power over another person or group. It may be:

- **Verbal/face-to-face:** name-calling, threats, humiliation, coercion, excluding or isolating.
- **Physical:** assault, unwanted contact, damage to property or belongings.
- **Social/relational:** rumours, intimidation, “silent treatment,” pressuring others to act harmfully.

- **Online/cyber:** posts, images, doxxing, impersonation, harassment, non-consensual sharing of content, group-chat pile-ons.
- **Prejudice-based:** involving hostility or derogatory language/actions linked to protected or personal characteristics (e.g., race/ethnicity, religion/belief, disability or SEND, sex, sexual orientation, gender identity, care-experienced status, socioeconomic background, appearance). **Bullying is different from ordinary conflict: it involves a power imbalance (perceived or actual).**

Local terminology: Staff distinguish bullying from one off conflict, dysregulated behaviour and friendship difficulties while recognising that repeated or pattern forming harm, coercion or a power imbalance may constitute bullying. Behaviour is understood in context and as communication but additional need never removes the right of another pupil to be safe. Concerns are considered alongside the Positive Behaviour Support Policy and Safeguarding and Child Protection Policy.

8. Roles and Responsibilities

Headteacher

- Sets culture, ensures resourcing, approves local procedures, and assures impact through governance reporting.
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Teachers and staff team

- Teach and model respectful relationships and digital conduct.
- Notice early indicators; respond proportionately; record and escalate concerns.
- Implement agreed supports and reasonable adjustments.

Education leaders/curriculum/programme leads

- Embed anti-bullying education across the curriculum and FE programmes; coordinate workload-aware responses and restoration.

Designated Safeguarding Lead and safeguarding team

- Advise on threshold, coordinate with the multi-agency team, maintain oversight of risk and safety plans.

Learners

- Treat others with respect; report concerns for self or others; participate in restorative processes where safe and appropriate.

Parents/carers and partners

- Work with the site to resolve concerns and sustain positive relationships.

Local roles and reporting: The Headteacher and the Designated Safeguarding Lead, retains overall accountability. Trained Deputy Designated Safeguarding Leads provide safeguarding cover across both sites. Assistant Headteachers provide day to day site leadership and the Pastoral Manager supports behaviour, attendance and pastoral monitoring. Pupils can report to any trusted adult. Parents and professionals can raise concerns through the school office, the relevant site leader or the Headteacher. Staff

record bullying concerns and actions on Behaviour Watch and immediately report any safeguarding risk verbally to the Designated Safeguarding Lead or a deputy.

9. Prevention (Culture, Curriculum and Skills)

We build a culture where bullying is unlikely to thrive by:

- **Teaching:** proactive curriculum on respect, consent, digital literacy, bystander action, and prejudice-based bullying (age/phase appropriate, including FE contexts).
- **Environment:** safe supervision zones, visibility on transport and in residences, clear online expectations.
- **Learner participation:** councils/ambassadors, co-designed campaigns, peer mentors.
- **Staff competence:** regular training on trauma-responsive practice, online trends, and prejudice-based harm.

Local prevention curriculum: Anti bullying learning is taught and revisited through personal, social, health and economic education, relationships and sex education, computing and online safety, assemblies, key working, tutor time, spiritual, moral, social and cultural development and wider curriculum opportunities. Sessions House content is adapted for primary age and developmental need. Anglia Way develops increasing independence, digital citizenship, consent, healthy relationships, bystander confidence, prejudice-based bullying and preparation for adult and community life. Staff reinforce Ready, Respectful and Safe and the values Aspire, Achieve, Engage, Empower and Excel in everyday interactions.

Reporting and Help-Seeking

We make multiple low-barrier routes available: in-person, discreet written alerts, online forms, anonymous options, and trusted-adult reporting. No concern is too small.

Local reporting routes:

- Report a concern: pupils may speak to any member of staff, use a trusted adult, provide a written note or ask a parent or carer to contact school. Staff receiving a concern record it on Behaviour Watch and ensure the appropriate site leader and safeguarding team are informed.
- Trusted adult routes: key worker or teacher, teaching assistant, DSL, Pastoral Manager, Assistant Headteacher, Deputy Headteacher, Headteacher or any member of the safeguarding team.
- Out of hours: the school is a day provision. Immediate danger outside school hours should be reported to emergency services or the relevant social care emergency duty service. School related concerns are reported to the school at the earliest opportunity and are considered under safeguarding procedures where risk is present.

Related policies: Safeguarding and Child Protection Policy, Online Safety and Acceptable Use arrangements, Complaints Policy and Whistleblowing Policy.

10. Responding to Concerns (Trauma-Responsive Process)

Step 1 — Stabilise & listen: Ensure immediate safety; listen without judgment; avoid compelling disclosure; signpost next steps; consider communication needs and reasonable adjustments.

Step 2 — Record & triage (same day): Log accurately; check for indicators of prejudice-based harm, online harm, exploitation, or group dynamics; review history for patterns.

Step 3 — Plan: Agree proportionate actions—support for the targeted Learner(s), fair process for those alleged to have caused harm, contact parents/carers where appropriate (age/consent-aware), and decide if safeguarding threshold is met.

Step 4 — Act & support: Implement supports (Section 10); consider restorative approaches where safe/appropriate; apply sanctions only where proportionate and educative; address online footprint (takedown/reporting).

Step 5 — Review: Re-check with Learners; adjust support; record outcomes; analyse for learning.

Local response standards:

- Response timeframes: immediate safety and safeguarding triage take place on the same day. Initial contact with the pupil and relevant adults is made as soon as practicable. A review point is normally set within five school days and sooner where risk remains or further information emerges.
- Appeal or complaint route: concerns about how bullying has been managed can be raised with the Headteacher and through the Cambian complaints process. Complaints about the Headteacher are escalated through regional or proprietor arrangements.
- Recording: Behaviour Watch is the school case recording system for bullying, behaviour and safeguarding related concerns. Records are factual, timely and access is restricted according to role and need to know requirements.

11. Support for Learners (Under and Over 18)

- **Targeted by bullying:** named adult; safe spaces; timetable/placement adjustments; catch-up and assessment flexibility; therapeutic input; digital hygiene coaching; travel/residential safety plan.
- **Those who caused harm:** structured reflection; reparative tasks; coaching on empathy/digital conduct; proportionate consequences; monitored re-integration.
- **Groups/classes:** restorative circles or facilitated discussions, if safe and consented.
- **Online harm:** guidance on evidence capture; platform reporting; privacy/security resets.

Local support arrangements:

- Wellbeing and pastoral support: a named trusted adult, Pastoral Manager, Key Worker, DSL, SENDCO or AHT responsible for behaviour involved according to pupil need. Safe spaces, timetable adjustments, regulation support and restorative work are used where appropriate and reviewed for impact.

- Multi agency pathways: safeguarding concerns are led by the Designated Safeguarding Lead and may involve parents or carers, placing local authorities, social workers, Early Help, health professionals or police according to threshold and risk. Actions are coordinated so that anti bullying and safeguarding plans do not conflict.

12. Online/Cyber Bullying

Expectations apply in all learning-related digital spaces. The site uses approved platforms; staff do not use personal accounts with Learners. Learners are taught how to report, block, preserve evidence and seek help quickly.

Local online safety arrangements:

- Platform controls: only school approved platforms, managed devices and accounts are used for learning. Filtering and monitoring arrangements apply across both sites and staff do not use personal accounts to communicate with pupils.
- Reporting online abuse: pupils preserve evidence where safe, block or report harmful accounts where appropriate and tell a trusted adult. Staff record the concern, assess safeguarding risk and support platform reporting, evidence preservation and family communication.

13. Prejudice-Based and Targeted Bullying

We take a zero-ambivalence stance on prejudice-based bullying (e.g., disability or SEND, race/ethnicity, religion/belief, sex, sexual orientation, gender identity, care-experienced status, socioeconomic background, appearance). Responses consider identity-based impact, power dynamics and wider group effects. Leaders monitor patterns and reduce disparities.

Local equality arrangements:

- Equalities monitoring: senior leaders review prejudice-based incidents, protected characteristic themes, repeat patterns and pupil voice through termly behaviour and safeguarding analysis. Findings inform equality objectives, curriculum planning and staff development.
- Hate incidents: prejudice-based incidents are recorded on Behaviour Watch and escalated to the Designated Safeguarding Lead. Police or other agencies are contacted where a criminal or safeguarding threshold may be met.

14. Reasonable Adjustments and Accessibility

We adapt processes, communications and learning tasks to remove barriers for Learners (including disabilities, neurodivergence, SEMH needs, English as an Additional Language). Flexible reporting options, accessible formats and adjusted timelines are available.

Local accessibility arrangements:

- Access planning: adjustments are recorded within the pupil's Education, Health and Care Plan provision, individual learning information, Positive Behaviour Support plan, risk assessment or other relevant school plan. Staff consider

communication, sensory, cognitive, emotional and physical needs when gathering information or arranging restorative work.

- Accessible formats: staff use visual support, simplified language, alternative communication methods, assistive technology and additional processing time where these help a pupil report or understand a concern.

15. Recording, Data and Privacy

- Record concerns/actions/outcomes on the site system; flag repeat patterns.
- Collect the minimum necessary personal data; store securely; follow retention rules.
- Use aggregated data to drive prevention and improvement.

Local recording and review:

- Case system: Behaviour Watch is used to record bullying, behaviour and safeguarding related concerns. Access is limited to authorised staff and safeguarding permissions are restricted further where appropriate.
- Retention: records are retained in accordance with CareTech data protection, privacy and records management requirements and any applicable safeguarding retention rules.
- Analysis: the Pastoral Manager and senior leaders review behaviour and bullying information regularly, with termly analysis of themes, repeat incidents, prejudice-based harm, locations, times and pupils requiring additional support. Safeguarding patterns are reviewed by the safeguarding team.

16. Safeguarding

Bullying can be a symptom or driver of wider risk (on-site, online, at home, in the community, in residences/work placements). We treat bullying concerns as safeguarding-relevant by default and apply a trauma-responsive approach:

16.1 Early identification & threshold thinking

- Consider indicators of **significant harm** or **risk of harm** (e.g., coercion, sexual harassment/violence, criminal or sexual exploitation, self-harm, hate incidents, persistent online abuse, group pressure, threats to safety).
- For **over-18 Learners**, consider adult-safeguarding concerns, capacity, and consent; balance autonomy with duty to protect.
- Where threshold is met, **escalate immediately** via the site safeguarding procedure.

16.2 Immediate safety & stabilisation

- Safety planning for targeted Learners (environmental tweaks, supervision, timetable changes, contact restrictions, travel/residential adjustments).
- Limit contact between parties while enquiries proceed; avoid actions that escalate distress; prioritise dignity and choice.

16.3 Information sharing & consent



- Share information **lawfully, proportionately and on a need-to-know basis** with the multi-agency team when risk is identified; record rationale.
- For adults, assess capacity and obtain consent where appropriate; override only where justified by risk/serious harm tests.
- Keep Learners informed about what will be shared and why; offer advocacy or a trusted adult.

16.4 Online/contextual safeguarding

- Consider **contexts** (class, residence, transport, local community, online platforms).
- Take steps to reduce ongoing harm (report to platforms; secure evidence; educate peer group; amend access/visibility settings).

16.5 Multi-agency coordination

- Consult/escalate to local safeguarding partners as needed; follow agreed local thresholds and referral pathways.
- Align anti-bullying actions with any child/adult protection plan or early-help plan; avoid duplicated or conflicting actions.

16.6 Documentation & review

- Record decisions, actions, and outcomes; set review points; monitor for recurrence or escalation; capture Learner voice in reviews.

Local safeguarding interface:

- Safeguarding contacts: Tawanda Madhlangobe is the Headteacher and Designated Safeguarding Lead and is supported by DSL Megan Fitzsimons. Trained Deputy Designated Safeguarding Leads provide cover across Sessions House and Anglia Way. Urgent concerns are reported verbally without delay and recorded on Behaviour Watch.
- Referral thresholds and forms: the school follows its Safeguarding and Child Protection Policy and local Cambridgeshire safeguarding pathways. The Designated Safeguarding Leads determines external referral routes and records decisions and rationale.
- Online risk: filtering and monitoring, online safety and acceptable use arrangements are used alongside safeguarding assessment where bullying involves digital spaces or devices.

17. Training and Competence

All staff receive induction and regular refreshers on: recognising bullying (incl. online and prejudice-based), trauma-responsive conversations, safe documentation, restorative practice, and the safeguarding interface.

Local training arrangements:

- Training: all staff receive anti bullying, safeguarding, online safety, equality and Positive Behaviour Support content through induction, annual safeguarding

updates, planned professional development and responsive briefings. Additional training is provided where trends or individual needs identify a gap.

- Completion records: mandatory and role specific training is monitored through the organisation training system and local training records with oversight from the Headteacher and senior leaders.

18. Quality Assurance and Governance

Leaders monitor: reporting volumes, response times, repeat incidents, prejudice-based patterns, Learner/parent feedback, staff training completion, and impact of prevention/education. Findings feed improvement planning and governance reporting.

Local quality assurance:

- Quality assurance: bullying and behaviour information is reviewed through ongoing pastoral monitoring, termly senior leadership analysis, safeguarding audit, pupil voice and the whole school quality assurance calendar. Actions are tracked through school improvement and pastoral or safeguarding plans.
- Governance reporting: the Headteacher reports significant themes, risks, action and impact through regional and proprietor governance arrangements while maintaining appropriate confidentiality.

19. Communication and Publishing Duties

- Publish this policy on the **site website** in an accessible format; provide alternative formats/languages on request.
- Provide a **plain-language summary** to Learners and parents/carers at induction and re-share annually.
- Display reporting routes around the site and on Learner platforms.

Local communication:

- Website: the policy is published with the school policies and information available to families and placing authorities. Accessible copies are provided on request.
- Learner and parent communication: reporting routes and key expectations are explained through induction, school information, direct staff communication, personal development work and reminders where incidents or emerging risks require them.
- Induction: staff induction and pupil transition arrangements explain Ready, Respectful and Safe, how to seek help and how the school responds to bullying and safeguarding concerns.

20. Linked Policies and Procedures

Local linked policies and procedures include:

- **Safeguarding and Child Protection Policy**
- **Online Safety, Acceptable Use and Filtering and Monitoring arrangements**
- **Positive Behaviour Support**
- **Equality, Diversity and Inclusion arrangements and equality objectives**

- Inclusion
- Special Educational Needs Policy and Accessibility Plan
- Data Protection
- Records Management
- Complaints Policy and Whistleblowing Policy
- Curriculum Policy, Personal, Social, Health and Economic Education Policy and Relationships and Sex Education arrangements
- Educational Visits, Alternative Provision and Work Experience arrangements where relevant
- Pupil and Parent information and school induction materials
- Mental Health and Wellbeing Policy

Appendix A — England

Legislation, guidance and regulatory frameworks underpinning anti-bullying in England

Preventing and Tackling Bullying (DfE) Guidance updated 2017

- **Means:** National guidance for leaders and staff on preventing and responding to bullying (including online); applies to schools and is useful for FE settings.
- **Requires:** A whole-site approach, clear reporting routes, proportionate responses, and targeted support for vulnerable Learners.
- **Our stance:** We embed prevention, early help and equitable access to help-seeking across all programmes and ages.
- **Implementation example:** Site behaviour/relationships policy references this guidance; incident logs show actions, outcomes and learner voice.
- **Links:** <https://www.gov.uk/government/publications/preventing-and-tackling-bullying>
- **Behaviour in Schools (DfE) updated 2024**
- **Means:** Non-statutory guidance that sets behaviour policy expectations, including responses to peer-on-peer abuse and incidents online.
- **Requires:** A published behaviour policy, consistent practice, and proportionate sanctions alongside support to prevent recurrence.
- **Our stance:** Anti-bullying practice is part of the behaviour curriculum and daily routines, not a standalone activity.
- **Implementation example:** Walkthroughs and work scrutiny show how routines, language, and restorative approaches reduce recurrence.
- **Links:** <https://www.gov.uk/government/publications/behaviour-in-schools--2>

Keeping Children Safe in Education (KCSIE) 2025

- **Means:** Statutory guidance for schools and colleges how cater for under 18s on safeguarding; covers child-on-child abuse, sexual harassment/violence and online harm.
- **Requires:** Clear reporting/escalation, DSL oversight, staff training, safe recording, and coordinated support when bullying indicates wider risk.
- **Our stance:** All bullying concerns are triaged through safeguarding; thresholds and multi agency team engagement are applied consistently.



- **Implementation example:** Case files show same-day logging, threshold decisions, parent/carer updates and review points.
- **Links:** <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Equality Act 2010

- **Means:** UK-wide law prohibiting discrimination, harassment and victimisation; relevant to prejudice-based bullying and reasonable adjustments.
- **Requires:** Eliminate unlawful conduct, advance equality of opportunity, foster good relations; evidence of accessible anti-bullying processes.
- **Our stance:** We design reporting, responses and curriculum messages to prevent prejudice-based bullying across all characteristics.
- **Implementation example:** Termly review of prejudice-based incident data with actions and communication to Learners and staff.
- **Links:** <https://www.legislation.gov.uk/ukpga/2010/15/contents>

Education (Independent School Standards) Regulations 2014 (ISS)

- **Means:** Standards independent schools must meet (e.g., welfare, health and safety; leadership; complaints); anti-bullying sits within welfare & leadership.
- **Requires:** Safe culture, effective behaviour and anti-bullying arrangements, compliant information/complaints and leadership oversight.
- **Our stance:** Proprietor and Headteacher/Principal review anti-bullying data and compliance at least termly.
- **Implementation example:** Governance minutes and compliance checks link incidents, actions and ISS Parts 3/8 assurance.
- **Links:** <https://www.legislation.gov.uk/uksi/2014/3283>

Ofsted: Education Inspection Framework (schools)

- **Means:** National inspection framework; inspectors consider behaviour, attitudes, personal development and safeguarding culture (bullying included).
- **Requires:** Evidence that Learners feel safe, bullying is rare/handled well, and staff act quickly and proportionately.
- **Our stance:** We maintain an inspection file with live evidence of prevention, response times, outcomes and learner voice.
- **Implementation example:** EIF evidence map: policies, logs, staff training records, learner surveys, and trend analysis.
- **Links:** <https://www.gov.uk/government/collections/ofsted-handbooks-and-frameworks>

Ofsted: Further Education & Skills inspection

- **Means:** Toolkit and operating guides for inspecting FE & skills providers under the EIF; includes whole-provider safeguarding and inclusion.
- **Requires:** Providers show safe culture, effective reporting, and proportionate responses to bullying across adult and 16–19 cohorts.
- **Our stance:** Anti-bullying is embedded in induction, tutorials and programme leadership across FE provision.



- **Implementation example:** FE inspection pack: tutorial plans, incident analysis by programme, reasonable-adjustment records, and learner feedback.
- **Links:** <https://www.gov.uk/government/publications/further-education-and-skills-inspection-toolkit-operating-guide-and-information>

Equality Impact Statement

This policy has been developed to promote equality, safeguard individual's rights, and ensure fair and inclusive practice across all services. The potential impact of the policy on children, young people, young adults, families, and staff with protected characteristics has been considered in line with the Equality Act 2010.

No negative impacts have been identified. Staff must apply this policy with sensitivity to individual need and make reasonable adjustments to ensure equitable access, safety, wellbeing, and participation for every individual. Any emerging risks of differential impact should be reported and addressed through ongoing review and quality assurance.