

Accessibility Plan

2019/2022



achieving
for children

Contents

Vision and duties.....	1
Priorities: implementation and strategic direction	4
School accessibility plans	7
Review.....	8
Appendix 1: Legislative basis	9
Appendix 2: support for educational settings and parents.....	14

Vision and duties

Achieving for Children (AfC)¹ strives to achieve excellence in everything it does by putting children and young people first in the design, delivery and evaluation of every service it provides, to ensure that they are supported to live safe, happy, healthy and successful lives. This commitment is therefore reflected in the company's accessibility strategy. The strategy encourages a proactive approach to improving access for children and young people in schools with disabilities. This is in keeping with the expectations of the SEND Code of Practice² which states: 'As part of its commitments under articles 7 and 24 of the United Nations Convention of the Rights of Persons with Disabilities³, the UK Government is committed to inclusive education of disabled children and young people and the progressive removal of barriers to learning and the participation in mainstream education.' The strategy has regard to the duties as outlined in the [Equality Act 2010](#) duties:

- not to treat disabled pupils less favourably for a reason related to their disability
- to make reasonable adjustments for disabled pupils so they are not at a substantial disadvantage

Disability is defined in law as a physical or mental impairment that has a substantial and long term negative effect on the ability to do normal day to day activities. Pupils with learning difficulties are likely to be protected by the act as well as those with conditions such as autism or ADHD, physical disabilities, mental and physical health conditions and difficulties with hearing and sight.⁴

The SEND Code of Practice: 0 to 25 promotes inclusive education and describes how the Equality Act 2010⁵ and the Children and Families Act 2014 work together to ensure this: 'The Children and Families Act 2014⁶ secures the general presumption in law of mainstream education in relation to decisions about where children and young people with SEN should be educated and the Equality Act 2010 provides protection from discrimination for disabled people.' Putting children and young people and their families at the centre is a key message of the SEND Code of Practice: 0 to 25 and is at the heart of the local authority's strategic planning. Local authorities must ensure the participation of children, their parents and young people in decision-making. More information on the legislative context can be found in Appendix 1 of this strategy.

This accessibility strategy outlines the steps the authority is taking to improve access for pupils with a disability. The plan aims to promote a proactive approach to improving access by:

- ensuring that the rights of pupils with disabilities are upheld
- supporting the aims and aspirations of pupils with a disability by promoting high aspirations and positive outcomes

¹ Achieving for Children (AfC) is a community interest company created by the Royal Borough of Kingston upon Thames and the London Borough of Richmond upon Thames to provide their children's services. AfC champions children and families, putting the wellbeing and education of children first.

² Special educational needs and disability code of practice: 0 to 25 years Statutory guidance for organisations which work with and support children and young people who have special educational needs or disabilities January 2015 DFE-00205-2013

³ The convention on the rights of persons with disabilities is an international agreement. The UK signed this treaty in 2009.

⁴ For more information follow this link: www.gov.uk/definition-of-disability-under-equality-act-2010

⁵ Equality Act 2010, crown copyright HMSO

⁶ Children and families act 2014 crown copyright HMSO

- Improving access to information, curriculum and the environment
- Promoting a positive attitude towards disability and challenging negative perceptions
- Developing a culture of awareness, acceptance and inclusion

This strategy should be read alongside the following SEND relevant documents available on the AfC local offer:

- SEND Futures document
- SEND Transformation Plans for Kingston and Richmond
- SEND Strategy for both boroughs, 2016/19.

Consultation

This plan has been produced by Achieving for Children, drawing on several recent consultations⁷ with parents, young people and children. This document sets out how we plan to:

- increase the extent to which disabled pupils can participate successfully in the curriculum offer, including the wider offer or enrichment curriculum of school trips and clubs in local schools and settings
- improve the physical environment of schools to enable disabled pupils to take better advantage of education, benefits, facilities and services provided
- improve the availability of accessible information to disabled pupils and their families

Findings

Children and young people agreed that, for example:

- adults in school were kind to them
- children in school were kind to them
- they are learning to be independent
- they have friends
- they get the help they need

Most parents agree or strongly agreed that:

- their child's school listens to them and values what they say
- their child's school communicates well
- the leadership has created an environment where they feel welcome and part of the community
- the school or college has high aspirations for their child
- reasonable adjustments were made to include their child
- schools help their children to make friends

⁷ For more information go to the SEND consultation Hub on the AfC local offer: www.afcinfo.org.uk/local offer

Summary of key messages from consultations informing priorities

- Additional local specialist places are needed in both boroughs for children and young people with EHCPs at all phases.
- Increase access to expertise for schools and other educational settings
- School staff, especially teaching assistants and learning support assistants and those teachers leading specialist provision need greater access to training to improve outcomes for children and young people and experiences of inclusion.
- More local provision helps CYP with EHCPs to play a more active role in their home communities.
- Need to improve, and maintain the best, quality of educational provision in mainstream, specialist resourced provisions and special schools.
- More support by families of CYP with EHCPs needed to navigate the transition from primary to secondary school and beyond
- Improve access to therapies provision to consistently meet needs of all CYP
- CYP sometimes have difficulty getting information that they understand
- Ensure a consistently positive attitude towards inclusion in education settings

Further consultations are planned in both boroughs and these will inform future developments and reviews of this strategy.

Priorities: implementation and strategic direction

Priority 1

Ensure compliance of the local authority and all educational settings for which it is responsible with the requirements of Schedule 10 of the Equality Act 2010.

Everyone working in and alongside all educational settings should be aware of the Equality Act and its implications for children and young people, their families and the wider community and aware of their duties within the act. AfC provides and signposts training on the Equality Act, diversity and disability for educational settings. This is delivered via:

- the central offer provided for schools by the workforce development team at www.afccpdonline.co.uk
- SENCO induction and termly networks, SENCO enews, SEN governor training, and network meetings for senior leaders.
- Protocols for issues such as admissions, part time timetables and exclusions also make reference to the legal duties around disability.
- A template available to schools to support the development of their accessibility strategy and action plan.
- An accessibility audit tool available to schools.

Priority 2

Maximise inclusion and the feeling of inclusion for all children and young people with SEND in their educational setting

Schools and other educational settings are responsible for providing a broad and balanced curriculum and play a key role in planning to increase access to the curriculum for all pupils. Through provision of the AEN self-evaluation tool, SEN data report card, training offer, networks, specialist support teams and accompanying SEN support map, AfC will support settings in ensuring that they are:

- using a graduated response when meeting the needs of children and young people with SEND, using the 'assess, plan, do, review' cycle to inform this
- providing staff with the opportunity for regular and updated training relating to additional needs, such as a programme of training available for learning support assistants and for teachers leading specialist resourced provisions
- using auxiliary aids effectively to ensure children and young people can be included in the curriculum, such as coloured layovers, pen grips, adapted physical education equipment, adapted keyboards and computer software
- prioritising and monitoring staff planning for children and young people with SEND
- deploying staff effectively to provide flexible support and facilitate independent learning
- thinking creatively about how children and young people with SEND can be involved in activities, trips and residential stays

- involving children and young people and their families in the review of individual plans regarding curriculum access
- establish a shared approach to ensuring that the wishes and feelings of children, young people and their families are at the heart of service planning and delivery, including the development of a local model that enables the engagement of as many families as possible in co-production and service planning
- establish and facilitate a local system of peer-to-peer inclusion audits that support inclusive practice in our local mainstream secondary schools

Priority 3

Increase the extent to which children and young people with SEND can participate in learning in all educational settings

As part of its SEN strategy and the SEND transformation plan for Kingston, AfC is developing new approaches to early intervention so that children with SEND are supported to remain in mainstream schools where this is appropriate. A strong focus for SEND work is promoting independence and strengthening transition for children and young people with SEND through school phases and into adulthood.

Actions

- Establish an early intervention panel to support mainstream schools in working effectively with pupils who have SEND, including making use of the skills and capacity in special schools and specialist resource provisions to provide expert outreach support to education providers.
- Developing specialist education places that are the first choice of children, young people and families, including expanding local specialist resource provisions and establishing new special schools and increasing special school places to meet identified needs so that needs can be met locally, maximising independence and ensuring children and young people remain part of their local communities.
- Quality assure the educational offer in all specialist resourced provisions, ensuring appropriate challenge and support where necessary.
- Appoint and establish the role of a transition officer to support families of children and young people with EHCPs in the key transition Key Stage 2 to Key Stage 3.
- Ensure the support of officers from the 14-19 team in enabling transition from Key Stage 4 to Key Stage 5.
- Establish and monitor the impact of local protocols for managed moves and part-time timetables with the aim of enabling every child or young person to successfully participate in education.
- Review the quality of local provision for young people aged 16 to 25 and develop new high quality and meaningful post-16 education, training and employment pathways, including consideration of the local adult learning offer.
- Establish a high quality local therapy offer that supports children and young people to make good progress towards their goals and maximise their opportunities for inclusion and independence.

- Develop a learning and development programme to upskill professionals working in schools and colleges in supporting children and young people with SEND.
- Ensure that parents, carer and children and young people feel confident that needs can be met in their local school where ever this is appropriate.

Priority 4

Improve the physical environment of all educational settings to increase the extent to which children and young people with SEND can effectively access education

All children and young people should be able to attend an educational setting with an accessible environment that enhances their ability to take part in the curriculum and does not put them at a disadvantage compared to their peers.

The Royal Borough of Kingston upon Thames Assets Team and the London Boroughs of Richmond upon Thames and Wandsworth SSA⁸ Programme Management Office work closely with AfC and health services such as the SEN team, school improvement officers, Educational Service for Sensory Impairment and Occupational Therapy to identify solutions that meet the needs of the individual pupils for whom adaptations are required. Work for community primary schools is usually funded through the Schools Access Initiative (SAI) funding element of the Education Capital Programme allocations that the Department for Education make to the two councils. In some cases, rather than making building adaptations, accessibility issues can be ‘managed’ at a school level through low cost ‘reasonable adjustments’, for example swapping an inaccessible upstairs classroom with a ground floor classroom rather than installing an expensive lift.

Priority 5

Enhance the delivery of information, advice and guidance to all children and young people with SEND and their families

Information, advice and guidance should be readily available in an accessible format for all children and young people with SEND and their families. In addition to ensuring that AfC documents consistently follow the corporate standards of plain English and the availability of alternative formats, effective provision of information, advice and guidance will be available as follows

- Enhance AfC’s Local Offer website www.afcinfo.org.uk/local_offer so that it provides a one-stop-shop for children, young people, parents, carers and professionals on local SEND provision that closely reflects the ambitions set out in this plan, ensures that universal and community providers, such as libraries and children’s centres are aware of this information and are able to help parents and carers to understand what is available in the local offer.
- Schools SEN information reports will be audited at random and feedback offered to school based on accessibility and compliance. Schools may also request an audit. There will be a charge or credit charge for this.
- Schools will be supported in developing their own accessibility plans and can access the template plan and guidance from AfC.

⁸ Shared staffing arrangement for Richmond upon thames and Wandsworth: Richmond and Wandsworth councils have entered into an agreement to share a single staffing structure across the two boroughs.

- SENDIASS will be commissioned by AfC to provide independent information, advice and support to CYP with SEND and their families. This service will also provide advocacy, and encourage partnership working.
- A range of opportunities are used to enable the co-production of information and to inform the development of information and services:
- Young participation members contribute to consultations through participation members monthly meetings.
- The Easy info Group and Online media Group led by young people with disabilities focus on developing accessible information for children and young people.
- Regular In-school focus groups
- Feedback opportunities on the SEND Local Offer found at the SEND consultation Hub.

School accessibility plans

Just as Section 10 of the Equality Act requires local authorities to prepare an accessibility strategy for schools for which it is responsible, it also requires the responsible body of a school to prepare an accessibility plan. This document and the accessibility audit tool and accessibility plan template aim to support all schools in being able to meet this duty in writing and publishing their plan. A school accessibility plan is a plan for:

- increasing the extent to which disabled pupils can participate in the school's curriculum
- improving the physical environment of the school for the purpose of increasing the extent to which disabled pupils are able to take advantage of education and benefits, facilities or services provided or offered by the school
- improving the delivery to disabled pupils of information which is readily accessible to pupils who are not disabled.

Accessibility plans should be adequately resourced, regularly reviewed and revised as necessary such as when accommodation improvements or repair and maintenance work are being planned, where the organisation of the curriculum is being considered or school activities are organised. It should also be reported to parents and carers annually. The Ofsted framework strengthens the requirements relating to equality of access and narrowing the gap in achievement. Governors should report annually on the impact of their school's arrangements for children and young people with SEND and progress made with implementing the accessibility plan. All other educational settings are encouraged to have accessibility plans.

Useful guidance can be found in 'The Equality Act 2010 and schools: departmental advice for school leaders, school staff, governing bodies and local authorities'.

www.gov.uk/government/publications/equality-act-2010-advice-for-schools

Review

The Equality Act 2010 requires the local authority to keep its accessibility strategy under review during the period to which it relates and revise it if necessary. Revisions to this strategy will be informed through feedback from parents and carers, voluntary organisations, children and young people and professionals supporting children and young people with SEN. This strategy is the responsibility of Achieving for children. It will be monitored by AfC officers and governed by the SEND strategy and action group.

Appendix 1: Legislative basis

1. Definition of disability and special educational needs

Disability

The Equality Act 2010 defines a disability as when a person has a physical or mental impairment:

- which is substantial and long-term (for over a year)
- which has an adverse effect on their ability to carry out normal day-to-day activities

This broad definition covers physical disabilities, sensory impairments, such as those affecting sight or hearing, learning disabilities and some specified medical conditions.

Special educational needs (SEN)

The SEND Code of Practice: 0 to 25 years 2015 states that: A child or young person has SEN if they have a learning difficulty or disability which calls for special educational provision to be made for them. A child of compulsory school age or a young person has a learning difficulty or disability if they:

- have a significantly greater difficulty in learning than the majority of others of the same age
- have a disability which prevents or hinders them from making use of facilities of a kind generally provided for others of the same age in mainstream schools or mainstream post-16 institutions

The broad areas of need described are:

- communication and interaction
- cognition and learning
- social, emotional and mental health
- sensory and/or physical

2. The Equality Act 2010

The General or Public Sector Equality Duty Section 149 the Equality Act 2010 introduces a single general duty (sometimes referred to as the Public Sector Equality Duty (PSED)) that applies to public bodies, including county councils and all educational settings.

The General Duty (PSED) extends to all aspects of a person's identity. These aspects are known as 'protected characteristics' and include race, disability, sex, age, religion or belief, sexual orientation, gender reassignment, marriage and civil partnership, pregnancy and maternity.

The three main elements of the general duty are, that in carrying out their functions, public bodies are required to have due regard to:

- eliminating discrimination and other conduct that is prohibited by the Act
- advancing equality of opportunity between people who share a protected characteristic and people who do not share it
- fostering good relations between people who share a protected characteristic and people who do not share it

The specific duties of the Equality Act

The main specific duties are:

- not to treat pupils or students with SEND less favorably
- the reasonable adjustments duty-to take reasonable steps to avoid putting pupils/students with SEND at a substantial disadvantage

The reasonable adjustments duty (schedule 13 of the Equality Act 2010)

The duty to make reasonable adjustments requires schools to take positive steps to ensure that pupils or students with SEND can fully participate in the education provided by that setting, and that they can enjoy the other benefits, facilities and services provided for all pupils or students.

The 2010 act sets out three requirements in relation to reasonable adjustments:

- where a provision, criterion or practice of a school puts a disabled person at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to avoid the disadvantage
- where a physical feature puts a disabled person at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to avoid the disadvantage
- where a disabled person would, but for the provision of an auxiliary aid, be put at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to provide the auxiliary aid

Many reasonable adjustments are inexpensive and will often involve a change in practice rather than the provision of expensive pieces of equipment or additional staff.

Anticipating reasonable adjustments

A school's duty to make reasonable adjustments is an anticipatory one and therefore the setting needs to make plans in advance about what pupils or students with SEND might require and what adjustments might need to be made. They should not wait until the pupils or students are on roll.

Auxiliary aids and services

In September 2012, the duty to provide auxiliary aids and services (including specialist equipment which could include laptops and tablets) was extended to include schools. This places schools under a duty to provide aids and services where it is reasonable and where it would prevent a disabled pupil being put at a substantial disadvantage when compared to his or her non-disabled peers. The exception to this duty is where the aid or service is specified in a statement of SEN or an education, health and care Plan in which case the responsibility to provide the aid or service lies with the local authority. Examples of auxiliary aids include coloured overlays, pen grips, adapted physical education equipment, adapted keyboards and computer software.

The relevant local authority support team will provide appropriate training and support in the use of auxiliary aids.

Overcoming disadvantage

Where something an educational setting does places a pupil or student with SEND at a disadvantage, compared to other pupils or students, then the setting must take reasonable steps to try and avoid that disadvantage.

SEN information report

The SEND Code of Practice: 0 to 25 states that a school's reasonable adjustments, along with other provisions, must be described in their SEN information report and published on its website. A suggested template for the SEN information report can be requested from the school improvement team's lead school improvement advisor for SEND. Schools can also request an audit of their information report.

School accessibility plans

Schools must have a written accessibility plan. The accessibility plan can be appended to or be part of the SEN information report. A template plan is available.

3. Children and Families Act 2014 and the SEND Code of Practice: 0 to 25

The Children and Families Act came into force on 1 September 2014. Part 3 of this act and associated regulations reforms the duties, policies and procedures relating to children and young people with SEND. The SEND Code of Practice: 0 to 25 provides statutory guidance relating to Part 3 of the Children and Families Act.

The SEND Code of Practice: 0 to 25 promotes inclusive education and describes how the Equality Act and the Children and Families Act 2014 work together to ensure this:

'As part of its commitments under articles 7 and 24 of the United Nations Convention of the Rights of Persons with Disabilities, the UK Government is committed to inclusive education of disabled children and young people and the progressive removal of barriers to learning and participation in mainstream education. The Children and Families Act 2014 secures the general presumption in law of mainstream education in relation to decisions about where children and young people with SEN should be educated and the Equality Act 2010 provides protection from discrimination for disabled people'

Admissions

The SEND Code of Practice emphasises that educational settings including further education establishments must not have discriminatory admissions policies. It states that:

'The Equality Act 2010 prohibits schools from discriminating against disabled children and young people in respect of admissions for areas on related to their disability.

Where a child or young person has SEN but does not have an Education Health and Care Plan they must be educated in a mainstream setting except in specific circumstances set out in the SEND Code of Practice'.

Putting the child or young person with SEND and their family at the centre

The SEND Code of Practice: 0-25 states that local authorities must have regard to:

- the views, wishes and feelings of the child or young person and their parents
- the importance of the child or young person and their parents participating as fully as possible in decisions and being provided with the information and support necessary to enable participation in those decisions
- the need to support the child or young person, and their parents, to facilitate the development of the child or young person and to help them achieve the best possible educational and other outcomes, preparing them effectively for adulthood and that local authorities must ensure the following:
 - the participation of children, young people and their parents in decision making
 - the early identification of children and young people's needs and early intervention to support them greater choice and control for young people and parents over the support they receive collaboration between education, health and social care services to provide support
 - high quality provision to meet the needs of children and young people with SEN
 - a focus on inclusive practice and removing barriers to learning successful preparation for adulthood, including independent living and employment

4. Key legislation and guidance

Equality Act 2010

www.legislation.gov.uk/ukpga/2010/15/pdfs/ukpga_20100015_en.pdf Equality Act: Schedule 10

www.legislation.gov.uk/ukpga/2010/15/schedule/10

Equality Act 2010

Guidance on matters to be taken into account in determining questions relating to the definition of disability (specifically schedule 10)

www.gov.uk/government/uploads/system/uploads/attachment_data/file/85010/disability-definition.pdf

The Equality Act 2010 and schools

Departmental advice for school leaders, school staff, governing bodies and local authorities

www.gov.uk/government/publications/equality-act-2010-advice-for-schools

Reasonable adjustments for disabled pupils (2012):

Technical guidance from the Equality and Human Rights Commission

www.equalityhumanrights.com/private-and-public-sector-guidance/education-providers/schools-guidance/key-concepts/reasonable-adjustments

Supporting pupils at school with medical conditions (2014) (DFE)

www.gov.uk/government/publications/supporting-pupils-at-school-with-medical-conditions

Children and Families Act 2014

www.legislation.gov.uk/ukpga/2014/6/contents/enacted

The Special Educational needs and Disability Regulations 2014

www.legislation.gov.uk/uksi/2014/1530/pdfs/uksi_20141530_en.pdf

SEND Code of Practice 2014 revised 2015

www.gov.uk/government/publications/send-code-of-practice-0-to-25

The Mental Capacity Act Code of Practice: Protecting the vulnerable (2005)

<https://www.gov.uk/government/publications/mental-capacity-act-code-of-practice>

Lightening Guide 05: Lighting For Education www.cibse.org/knowledge/knowledge-items/detail?id=a0q20000008I7kGAASBB93

Acoustic Design of Schools

www.gov.uk/government/publications/bb93-acoustic-design-of-schools-performance-standards

Appendix 2: support for educational settings and parents

Achieving for children's SEND Local Offer for Kingston and Richmond

The SEND Local Offer sets out in one place, the support and provision that is available for children and young people with SEND and their families. It enables children, young people and their families to make informed choices about support and provision and is used to review and develop provision in Kingston and Richmond. It includes: universal services such as schools and doctors and targeted services for children and young people with SEND who need short-term support (that is over and above that provided by universal services) and specialised services for children and young people with SEND who require specialist and long term support.

SENDIASS (Special Educational Needs and Disability Information Advice and Support Service)

This service provides information, advice and support to children and young people with SEND and their families. The service is impartial, accessible and all staff are independently trained. Although the service is primarily for families, it supports educational settings by providing advocacy, independent advice and encouraging partnership working.

Support includes information, advice and support on subjects including:

- local policy and practice
- the Local Offer
- personalisation and legal aspects of SEN and disability
- health and social care support for families throughout the education health and care plan process
- confidential and impartial information, advice and support to young people (16+) on their own
- if requested, support in preparing for and attending meetings
- help in filling in forms and writing letters or reports
- support in resolving disagreements, including mediation and tribunals
- signposting to other local or national sources of advice, information
- support links to local parent support groups and forums

Services for education settings including schools

Officers from AfC and the local councils are available to support educational settings in ensuring accessibility. Some services and teams provide non-chargeable core and statutory support, some provide traded services and some a combination of the two. Settings should access the support map for details of services at universal and targeted or high needs.

Template and audit tool

A template for an accessibility strategy and action plan and an accessibility audit tool are both available on the AfC local offer to support schools.